

4.6 HAZARDS AND HAZARDOUS MATERIALS

4.6.1 INTRODUCTION

This section describes the existing conditions with respect to hazards and hazardous materials at the Hayward campus and potential impacts related to hazards and hazardous materials that may occur as a result of campus growth under the proposed Master Plan. Regulations and policies affecting hazardous conditions and materials are also described in this section. Information presented in this section was obtained from the CSUEB Department of Environmental Health & Safety (EH&S) and a government records search performed by Environmental Data Resources.

Public and agency comments related to hazards and hazardous materials received in response to the Notice of Preparation (NOP) issued for this EIR are summarized below.

- Hazardous materials use and storage on the campus must comply with Certified Unified Program Agency (CUPA) requirements.
- A Unified Program Consolidated Permit must be obtained from the Hayward Fire Department's Hazardous Materials Office and maintained for storage and use of hazardous materials.
- Hazardous materials use and storage must comply with the City of Hayward's Uniform Fire Code and Hazardous Material Storage Ordinance.
- The Campus must maintain a Hazardous Materials Business Plan.
- Soil or groundwater contamination on site should be identified and remediated to applicable standards.
- Development of asbestos-containing materials should be evaluated by the appropriate agencies.
- Environmental concerns from the demolition of old structures should be investigated and mitigated in accordance with the Department of Toxic Substances Control's (DTSC) 2006 *Interim Guidance, Evaluation of Schools Sites with Potential Soil Contamination as a Result of Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers*.
- The Campus is invited to participate in DTSC's School Property Evaluation and Cleanup Program.

Those comments that are relevant to the environmental impacts of the proposed project were considered in the analysis of impacts in this section.

4.6.2 ENVIRONMENTAL SETTING

The Hayward campus uses many materials, some of which are considered hazardous, during the course of daily operations. Such hazardous materials on campus include chemical reagents, solvents, fuels,

paints, cleaners, pesticides, and biohazardous substances that are used in activities such as laboratory research, building and grounds maintenance, vehicle maintenance, and fine arts. Generally these types of materials are used in small quantities on the Hayward campus.

A number of properties may cause a substance to be considered hazardous, including toxicity, ignitability, corrosivity, or reactivity. According to the State of California (California Code of Regulations Section 66084), hazardous material is defined as

...a substance or combination of substances which, because of its quantity, 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.

By convention, hazardous materials are generally chemicals, but radioactive materials and biohazardous materials are also hazardous. This Draft EIR considers hazardous materials to include hazardous chemicals, radioactive materials, and biohazardous materials.

Hazardous materials use on the campus generates hazardous byproducts that must eventually be handled and disposed of as hazardous waste. Hazardous waste, by definition, is any hazardous material that is to be abandoned, discarded, or recycled. Hazardous waste is a subset of hazardous materials; therefore, the same criteria that render a material hazardous make a waste hazardous.

4.6.2.1 Study Area

To evaluate the impacts of campus development under the proposed Master Plan related to hazards and hazardous materials, the study area is defined as the Hayward campus. The term “campus” encompasses the 180-acre developed area as well as approximately 184 acres of undeveloped land in the eastern portion and southern portions of the campus.

4.6.2.2 Existing Hazardous Materials Use and Waste Generation

Hazardous materials are used at the Hayward campus for a variety of purposes. Research and teaching laboratories are the primary users of hazardous materials. Types of hazardous materials found in laboratories include the following, typically in small quantities:

- solvents used for cleaning, extraction, or other laboratory activities;
- reagents (chemical starting materials);
- reaction products (products of chemical reactions), which may have unknown composition;

- radioactive materials used in campus laboratories;
- biological agents, including rats and frogs used in biological studies; and
- test samples (e.g., specimens such as blood, tissue, soil, or water), prior to use in a testing procedure.

Physical campus maintenance activities also require hazardous materials. Examples of hazardous materials used during vehicle, grounds, and building maintenance activities include:

- fuels (gasoline and diesel);
- oils and lubricants;
- antifreeze;
- cleaners, which may include solvents and corrosives in addition to soaps and detergents;
- paints and paint thinners (both oil based and latex);
- freons (refrigerants); and
- pesticides and herbicides.

Currently, hazardous materials are primarily used in two major science buildings. Some hazardous materials are also used in arts buildings and maintenance buildings, and biohazardous materials are used in the existing Student Health Services building.

Hazardous chemical wastes are generated whenever hazardous chemicals are used. General types of hazardous chemical wastes on the campus include spent solvents from laboratories, maintenance buildings, and creative arts buildings, discarded laboratory reagents and reaction products, unused paints and oils, and contaminated materials such as gloves and containers.

On- and Off-Campus Contamination

Historical government databases were reviewed in order to identify potential sources of contamination or hazardous materials. Potential sources located in a 0.5-mile radius of the Hayward campus that were identified in the course of these investigations are summarized below.

- Five historical underground storage tanks (USTs) and one active aboveground storage tank (AST) were reported on the campus. One of the USTs was discovered to be leaking due to structural failure in 1988. The 750-gallon leak of diesel fuel was confirmed in 1996. Information on the abatement action is not included in the agency databases.

- A drycleaners located east-southeast of the campus at 26775 Hayward Boulevard was identified in the RCRA Small Quantity Generator (SQG) database as a site that generates between 100 kg and 1,000 kg of hazardous waste per month.

In addition to the above, due to the age of some of the campus buildings, some buildings on the campus that may be renovated or demolished under the proposed Master Plan could contain asbestos containing materials (ACMs), lead-based paints (LBPs), and PCBs usually found in the ballast of fluorescent light bulbs). The presence of ACMs is documented for each building in the CSUEB Hayward Asbestos Notification 2008. If not previously documented, LBPs would be documented by a lead survey that CSUEB routinely requires for all remodeling and demolition projects. State law also requires that contractors and workers be notified of the presence of lead-based paint and asbestos in buildings constructed before 1979.

4.6.3 REGULATORY SETTING

Hazardous materials handling and hazardous waste management are governed by federal, state, and local laws and regulations. These laws apply to the classroom activities, research-related activities, maintenance work, and all other applicable activities on the campus. Laws and regulations related to health and safety are summarized below.

4.6.3.1 Federal Regulations

The US Environmental Protection Agency (US EPA) is the main federal agency responsible for enforcing regulations relating to hazardous materials and wastes, including evaluation and remediation of contamination and hazardous wastes. The US EPA works collaboratively with other agencies to enforce materials handling and storage regulations and site cleanup requirements. The Occupational Safety and Health Administration (OSHA) and the Department of Transportation (DOT) are authorized to regulate safe transport of hazardous materials.

Federal regulations which regulate the handling (including transportation), storage, workplace safety, and disposal of hazardous materials and wastes are contained primarily in Titles 10, 29, 40, and 49 of the Code of Federal Regulations (CFR), specifically the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Responsibility, Compensation, and Liability Act of 1980 (CERCLA).

RCRA created a major new federal hazardous waste “cradle-to-grave” regulatory program administered by EPA. Under RCRA, EPA regulates the generation, treatment, and disposal of hazardous waste, and the investigation and remediation of hazardous waste sites. RCRA includes procedures and requirements for reporting releases of hazardous materials and for cleanup of such releases. RCRA also includes

procedures and requirements for handling hazardous wastes or soil or groundwater contaminated with hazardous wastes. Individual states may apply to EPA to authorize them to implement their own hazardous waste programs in lieu of RCRA, as long as the state program is at least as stringent as federal RCRA requirements. California has been authorized by EPA to implement its own hazardous waste program, with certain exceptions. The California program is handled by the Department of Toxic Substances Control DTSC (see below).

CERCLA delineates the liability for contamination between current property owners and others. The Hazardous Materials Transportation Act is administered by the DOT via its issuance of inspections, training, and transportation requirements and information; the federal government delegates enforcement authority to the states.

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) are emissions standards set by the US EPA for air pollutants that may cause an increase in fatalities or in serious, irreversible, or incapacitating illness. The US EPA delegates authority over NESHAPs to local air agencies.

4.6.3.2 State Regulations

State agencies that regulate the use of hazardous materials include the California Environmental Protection Agency (Cal/EPA), the Office of Emergency Services (OES), the Department of Health Services (DHS), the DTSC, and the Regional Water Quality Control Board (RWQCB).

DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste, and the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal and state hazardous waste laws. Under this program, a business is classified as a large quantity generator (LQG) if it generates 2200 pounds or more of hazardous waste or 2.2 pounds of acutely hazardous waste in a calendar month. Generators of quantities under this amount are designated small quantity generators. Based on annual hazardous waste disposal, CSUEB is listed as LQG (EDR 2008). The campus complies with the requirements of this designation.

The DTSC also administers Cal/EPA's standards regarding public health effects of soil contamination, while the RWQCB administers state water quality standards for surface and groundwater. Lead responsibility for remediation depends on the proposed use of a parcel, the character of waste contaminants, and the need for site monitoring.

The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) are the enforcement agencies for hazardous materials transportation regulations. State regulations applicable to hazardous materials are contained in Titles 8, 22, and 26 of the California Code of Regulations (CCR) and

include the State Water Code, Underground Storage Tank Code, Cortese Act (listing of hazardous waste and substances sites), and Proposition 65 (safe drinking water and toxics enforcement).

Cal/OSHA regulates work practices at asbestos levels less than 1 percent. Samples containing less than 1 percent asbestos are regulated as outlined in 8 CCR Section 1529.

4.6.3.3 Local Regulations

The Bay Area Air Quality Management District (BAAQMD) is the local NESHAP authority for the Bay Area. The local NESHAP authority requires 10 business days' notification prior to the commencement of demolition activities or work that affects regulated ACMs.

The Hayward Fire Department Hazardous Materials Office is responsible for administering federal, state, and local policies, including:

- consulting with businesses for the safe storage and use of hazardous materials;
- responding to hazardous materials emergencies;
- training emergency response personnel in hazardous materials incident response;
- conducting inspections of facilities where hazardous materials and wastes are used and/or stored;
- reviewing construction plans for facilities using hazardous materials;
- investigating exposures to, or releases of, hazardous materials; and
- implementing the Certified Unified Program Agency (CUPA) program for the City of Hayward.

4.6.4 IMPACTS AND MITIGATION MEASURES

4.6.4.1 Standards of Significance

In accordance with Appendix G of the *State CEQA Guidelines* and the CSU CEQA Handbook, the impact of the proposed Master Plan project related to hazards and hazardous materials would be considered significant if it would:

- 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 0.25 mile of an existing or proposed school;
- be located on a site that 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;
- 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, would the project result in a safety hazard for people residing or working in the project area;
- for a project within the vicinity of a private airstrip, would the project 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.

Issues Not Discussed Further

Implementation of the proposed project would not expose people on the project site to any safety hazards related to public airports or private airstrips because the project site is approximately four miles east of the Hayward Airport, and is also not located within the vicinity of a private airstrip. These issues are not discussed further in this section.

4.6.4.2 Methodology

The potential for the release of hazardous materials during the course of master plan implementation was evaluated by identifying the types of hazardous materials and waste present on the Hayward campus as well as ways in which the handling and disposal of such materials could result in accidental releases to the environment.

As discussed in the Environmental Setting section, a number of different hazardous materials are used on the campus usually in small quantities and different types of hazardous waste are generated during the course of research, maintenance, and other activities on the Hayward campus. Because of the nature of campus research, the chemicals used at any particular time on campus change rapidly and sporadically, as do the quantities of materials used. Therefore, a detailed inventory of hazardous materials to be used on the campus with growth and development under the proposed Master Plan is not provided in this Draft EIR. However, the types of hazardous materials that will be used on the campus with

implementation of the proposed Master Plan are expected to be similar to those that are currently used on the campus, as described in the Environmental Setting.

Hazardous materials could be released to the environment during their delivery to or removal from campus facilities; the potential for such a release is considered in the following section. Once hazardous materials are delivered to campus facilities, accidents or spills in outdoor areas, and air emissions from fume hoods, and engine exhausts would be the only potential release sources for hazardous materials to the immediate outside environment, since most activities related to hazardous materials will occur inside the buildings. The potential impacts from accidents in outdoor areas are discussed in this section, whereas the potential impact associated with hazardous air emissions is discussed in **Section 4.2, Air Quality**.

4.6.4.3 Project Impacts and Mitigation Measures

MP Impact HAZ-1: Campus development and activities under the proposed Master Plan would not create significant hazards to the public or the environment from the use, storage and transport of hazardous materials under routine or upset conditions.

Level of Significance: Less than significant

Campus growth under the proposed Master Plan would involve an increase in the number of laboratories and the expansion of other facilities, such as maintenance facilities, which involve the use of hazardous materials, generation of hazardous waste, and the transportation of such materials to and from the campus. CSUEB plans for an increase in science buildings, creative arts buildings, and facilities and maintenance buildings under the proposed Master Plan. This increase in space will result in the increase in use of hazardous materials, generation of hazardous waste, and transport of such materials, as further described below.

Hazardous Materials Use

Laboratories and other facilities constructed under the proposed Master Plan will continue to comply with all hazardous materials standards for the Hayward campus related to use and storage of such materials outlined in the campus Hazard Communication Plan (2008). Cal/OSHA has mandated that steps be taken to minimize exposure to chemicals in the air. Researchers and other workers will continue to take these standard procedural precautions, such as working under fume hoods when using chemicals likely to present exposure hazards. To prevent exposure through skin contact, campus policies and procedures established by the Campus EH&S require that protective clothing, such as laboratory coats,

gloves, and safety glasses, be worn while handling hazardous materials and wastes. Proper washing after handling chemicals is also required. Exposure to the public from hazardous materials use on campus is limited because such materials are used primarily indoors. The only potential pathway for public exposure would be air emissions. To minimize exposure to chemicals in the air and to comply with Cal/OSHA requirements, researchers and other workers will continue to take standard procedural precautions, such as working under fume hoods when using chemicals likely to present exposure hazards. Special handling protocols and storage requirements are already in place for radioactive materials and biohazardous materials in compliance with all applicable regulations. While increased use of hazardous materials will likely occur with the expansion of facilities under the proposed Master Plan, the Campus will continue to comply with all hazardous materials standards, and therefore this use will not create significant hazards to the public or the environment.

Hazardous Waste Generation

Laboratories and other facilities constructed under the proposed Master Plan will continue to comply with all standards related to hazardous waste generation for the Hayward campus. The Campus EH&S has prepared guidelines for proper disposal of hazardous wastes based on regulations established by the EPA and the DTSC. To facilitate safe management, hazardous wastes are controlled from generation to pickup by Campus EH&S hazardous waste disposal guidelines. These guidelines specify that as soon as waste is generated, the user must complete an online storage tag and attach it to the storage container. Waste must be stored in a hazardous waste accumulation area in a container with a tight lid that is compatible (i.e., nonreactive) with the material being stored, surrounded by secondary containment, and free from contamination. Sharps waste (e.g., syringes/needles), which are primarily generated in the Student Health Services building, must be packaged in appropriate, safe containers. Different types of waste, such as medical wastes and radioactive wastes, must not be mixed and require special storage and handling. Partially filled containers can be stored for up to 60 days. Once a container is ready for disposal, the user must submit a request for disposal to the Campus EH&S. The Campus EH&S manages final removal of wastes from the campus in compliance with all applicable regulations. While increased hazardous waste generation will likely occur with the expansion of facilities under the proposed Master Plan, the Campus will continue to comply with all hazardous materials regulations related to waste generation and disposal, and therefore such the handling and disposal of such waste will not create significant hazards to the public or the environment.

Hazardous Materials Transport

As discussed above, campus growth under the proposed Master Plan will increase the use of hazardous materials and the generation of hazardous waste on the campus. Consequently, the transport of

hazardous materials and waste to and from the campus will also increase. CSUEB policy requires that packaging of chemicals to be transported on public roads comply with all legal requirements, including those of Caltrans, the California Department of Agriculture, the California Highway Patrol, and the guidelines of the International Civil Aeronautics Organization and the International Air Transport Association. All hazardous waste is picked up from generators by the Campus EH&S or a licensed hazardous waste contractor, and generators must properly package and label all hazardous wastes. In addition to proper packaging and labeling, radioactive waste must be accompanied by a completed Radioactive Waste Tracking Form. The Campus contracts with radioactive waste contractors to remove the radioactive waste from campus and the contractors take the waste to approved radioactive waste facilities. While increased hazardous materials transport will likely occur with the expansion of facilities under the proposed Master Plan, the Campus will continue to comply with all hazardous materials standards related to transport, and therefore such transport of materials will not create significant hazards to the public or the environment.

Upset and Accident Conditions

The Campus EH&S currently maintains spill response guidelines that account for the existence of hazardous materials on the campus. Each individual building and unit is required to have an emergency plan that accounts for the materials present in the building. A current paper copy of the plan must be submitted to the Campus EH&S. All campus departments prepare and maintain department Illness and Injury Prevention Plans and emergency response plans. Since 1992, no spills have occurred on campus that exceeded the response capabilities of CSUEB EH&S (EDR 2008). The types and quantities of hazardous materials used by new facilities developed under the proposed Master Plan will be similar to those used in existing facilities. Although the number of hazardous materials incidents could potentially increase, the types of incidents will be similar to those that have occurred in recent years (i.e., very small spills in confined areas). EH&S does not foresee any difficulty in responding to incidents that may occur with new development under the proposed Master Plan. Furthermore, compliance with all applicable regulations related to the use, storage, and transport of hazardous materials, as described above, will minimize the potential for accidental spills and release of materials to the environment. Therefore, the proposed Master Plan project would not result in significant hazards to the public or the environment through increased potential for upset or accident conditions.

Environmental health and safety laws and regulations are dynamic and have been revised and expanded in recent years. CSUEB has a record of maintaining a safe environment for the campus and local community through its implementation of the increasingly complex and stringent laws and regulations regarding the use, storage, and transport of hazardous materials. Throughout the planning horizon of the proposed Master Plan, CSUEB would continue to comply with all federal and state laws and regulations

and would continue to implement all safety programs and procedures currently in place as established by the Campus EH&S. These procedures would continue to avoid or substantially limit exposure of students, faculty, staff, and the community at large to hazardous materials. All projects implemented under the proposed Master Plan would comply with these controls. Therefore, campus development under the proposed Master Plan would not create significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials, or under upset and accident conditions involving the release of hazardous materials into the environment. The impact is considered less than significant.

Mitigation Measure: No mitigation is required.

MP Impact HAZ-2: **Campus development and activities under the proposed Master Plan would not create significant hazards to the public or the environment, such that existing or proposed adjacent schools may be affected.**

Level of Significance: Less than significant

There is one existing childcare center on the campus. The Early Childhood Education Center is located on the east edge of the campus on Old Hillary Road. There are no existing schools within 0.25 mile of the campus boundary and no new schools are planned at this time within this radius of the campus

Although hazardous materials and waste use within 0.25 mile of the childcare center will likely increase as a result of campus growth under the proposed Master Plan, these materials will not exist in quantities sufficient to pose a risk to occupants of the childcare center or campus community. Because hazardous materials in laboratories are typically handled in small quantities and would continue to be handled in this manner under the proposed master plan, the potential consequences of an accidental release will be limited to a single building and in most cases, to the individual laboratory where the spill occurred. Furthermore, as discussed under **MP Impact HAZ-1**, the Campus will continue to comply with federal and state regulations, including BAAQMD requirements for toxic air contaminant emissions, and will continue to implement existing campus safety programs and procedures. Therefore, the impact to those attending existing or proposed childcare centers will be less than significant.

Mitigation Measure: No mitigation is required.

MP Impact HAZ-3: Construction and demolition activities under the proposed Master Plan in one area of the campus could expose construction workers, campus occupants, or the public to contaminated soil or groundwater.

Level of Significance: Potentially significant

As discussed above, the governmental databases search indicated that a leaking underground storage tank (LUST) released approximately 750 gallons of diesel fuel before removal in 1988. Records do not indicate if the contaminated site was remediated. Excavation and other ground disturbing activities in conjunction with the construction of a new facility on the campus in the area of the previous LUST could encounter contaminated soils or groundwater, and potentially expose construction workers, campus occupants or the public to these materials. This is considered a potentially significant impact. The following mitigation measure will be implemented by the Campus, which would reduce the impact to a less than significant level.

MP MM HAZ-3: As and when a project is proposed in the vicinity of the LUST site, the Campus shall conduct a Phase I Environmental Site Assessment (ESA) and if necessary a Phase 2 ESA of the contaminated site. Based on the results of the investigation, the Campus in conjunction with the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) and DTSC shall determine if remediation is required. Remediation will be implemented before the site is excavated or otherwise disturbed for construction.

Significance after Mitigation: Less than significant

MP Impact HAZ-4: Demolition or renovation of buildings under the proposed master plan could expose construction workers, campus occupants or the public to contaminated building materials.

Level of Significance: Potentially significant

Hazardous materials could be encountered in campus buildings when they are demolished or remodeled under the proposed Master Plan. These hazardous materials could be related to lead-based paints or asbestos used in the construction of the buildings, or to past spills and other releases of hazardous materials (such as chemicals) in laboratories during research activities.

As noted earlier, due to their age, some of the older buildings on the Hayward campus are expected to contain ACMs or LBPs. The presence of ACMs is documented for each building in the CSUEB Hayward

Asbestos Notification 2008. If not already documented, LBPs will be documented by a lead survey that the Campus requires for all remodeling and demolition projects. State law also requires that contractors and workers be notified of the presence of LBPs and ACMs in buildings constructed before 1979. The California Department of Health Services requires the certification of employees and supervisors performing lead-related construction activities in residential and public buildings. Standard specifications included in all campus construction contracts specify that contractors who disturb or potentially disturb asbestos or lead must comply with all federal, state, and local rules and regulations regarding hazardous materials. Contractors are also required to stop work and inform the Campus if they encounter materials believed to be asbestos, lead, PCBs, or other hazardous materials. The demolition, renovation or removal of asbestos-containing building materials is also subject to the limitations of Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing. The BAAQMD's Enforcement Division would be consulted prior to commencing demolition of a building containing ACMs.

The existing library will be renovated and Pioneer Heights Phase I student housing will be demolished in the course of the proposed Master Plan. Other existing buildings on the Hayward campus may be demolished if renovation is determined to be infeasible. While no significant spills or contamination have been reported in the library or the student housing, if proper procedures are not followed for demolition or renovation of buildings containing laboratory space, exposure to contaminated materials could occur during construction, resulting in a potentially significant impact. **MP Mitigation Measure HAZ-4** requires that the Campus develop procedures to ensure that laboratory building materials are decontaminated and safe for handling by construction workers and for removal from the campus. Continued compliance with federal and state regulations, campus policies, and current EH&S procedures, and the development of specific procedures for the demolition of laboratory space under **MP Mitigation Measure HAZ-4**, will minimize the potential for exposure of workers to contamination inside laboratory structures and will ensure proper removal of such materials from the campus. Therefore, with mitigation this impact will be less than significant.

MP MM HAZ-4: The Campus shall develop a procedure for the demolition of laboratory space. These provisions shall ensure the removal of hazardous materials; the decontamination of surfaces and equipment; proper characterization, storage and shipment of hazardous materials removed from laboratories; and proper worker training and safety procedures. These procedures shall provide for the following:

- Removal of all hazardous materials.

- User inspection for contamination.
- Performance of a site audit to determine likelihood of chemical spills.
- Performance of sampling for potential chemical contamination, if site audit finds that this is warranted.
- Use of survey meters or wipe samples to detect lingering radioactivity, if radioactive materials were present.
- Performance of sampling for potential chemical contamination, if site audit finds that this is warranted.
- Communication with workers to ensure any remaining risk and health and safety procedures are understood and followed during demolition.
- Following proper procedures for characterizing, storing, and shipping hazardous wastes, if necessary.

Significance after Mitigation: Less than significant

MP Impact HAZ-5: Campus development under the proposed Master Plan would not interfere physically with the Campus' Emergency Operations Plan.

Level of Significance: Less than significant

The current campus Emergency Operations Plan (EOP) provides guidance for campus activities in case of an emergency. The EOP details a chain of command to help the campus handle a variety of emergencies. Different campus staff may take control of the situation, depending on the type of emergency. Additionally, each campus department and building is required to maintain individual EOPs for building or department-specific emergencies or in the event that campus-wide communication is unavailable. Emergency evacuation drills are performed annually as required by CSU executive orders.

The Campus is expected to continue its practices and programs related to emergency response as the Campus grows under the proposed Master Plan. Consistent with the Campus' current procedure, as new buildings are built on the campus under the proposed Master Plan, an EOP would be developed for each new building. Furthermore, campus growth under the proposed Master Plan would not interfere with the campus EOP through construction-related road closures. Under current campus policy, contractors must complete work with the least possible obstruction to traffic, and must keep fire hydrants accessible at all times. The CSUEB Facilities Planning & Operations is the agency with the responsibility of regulating lane closures, and the University Police Department ensures that lanes are passable at all times. These practices and procedures related to road closures during construction would continue on the

campus. Therefore based on current practices and procedures, the impact related to interference with the campus EOP would be less than significant.

To ensure that these procedures and notification requirements will continue under the proposed Master Plan, **MP Mitigation Measures HAZ-5a** and **HAZ-5b** are included. Implementation of these mitigation measures will further reduce the impact by ensuring that construction-related road closures do not adversely affect campus activities in the event of an emergency and requiring that site-specific EOPs be developed for the new facilities, in accordance with current campus practices.

MP MM HAZ-5a: The Campus shall require new construction under the Master Plan to adhere to the following standards already established by Facilities Planning & Operations:

- Construction work shall be conducted so as to ensure the least possible obstruction to traffic.
- Contractors shall notify the Campus Representative at least two weeks before any road closure.
- When paths, lanes, or roadways are blocked, detour signs shall be installed to clearly designate an alternate route.
- Fire hydrants shall be kept accessible to fire fighting equipment at all times.
- To ensure adequate access for emergency vehicles when construction projects will result in temporary lane or roadway closures, campus police and dispatchers shall be notified of the closures and alternative travel routes.

MP MM HAZ-5b: New or updated building and/or department-specific EOPs shall be developed for any new development project.

Significance after Mitigation: Less than significant

MP Impact HAZ-6: **Campus development under the proposed Master Plan would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.**

Level of Significance: Less than significant

New buildings and spaces constructed under the proposed Master Plan in general would be added to the already developed portion of the campus. With the exception of some expansion of student housing in the southern portion of the campus and potential location of faculty/staff housing south of Grandview Avenue, all new development would be sufficiently distant from open space areas that surround the

campus and have the potential for wildland fires. Therefore the vast majority of new development of the campus would not expose people or structures to a significant risk involving wildland fires. Furthermore, the Campus implements a vegetation management program to reduce fire fuel loads on all undeveloped lands within the campus boundary.

The new student housing area and one of the three sites proposed for the development of faculty/staff housing in the southern portion of the campus are adjoined by open grassland areas. These project sites would be at a relatively higher risk of exposure to wildland fires during the fire season. With respect to these project sites, the impact related to risk from wildland fires would be less than significant for the following reasons:

- All buildings would be designed and constructed in conformance with the California Building Code and with applicable fire code safety requirements. The fire protection systems would meet all statutory requirements which apply to the student and single-family housing. Fire hydrants would be provided to protect the buildings against wildland fire threats and protect the wildland in case of a fire in the buildings that threatens the surrounding lands.
- In compliance with the campus' vegetation management program, all new landscaping in the areas surrounding the new housing will be developed to minimize the threat of wildland fire damage to facilities and personnel. The landscaping plan would provide for control of accumulation of light medium vegetation (grasses and woody shrubs).
- Vegetation management to reduce fuel loads will continue to be conducted by the campus on all areas adjacent to the sites of the student housing and faculty/staff housing projects.

Mitigation Measure: No mitigation is required.

4.6.4.4 Cumulative Impacts and Mitigation Measures

Cumulative Impact Related to Increased Use, Disposal and Transport of Hazardous Materials

The cumulative context for hazardous materials use is the Hayward campus and the southeastern portion of the City of Hayward. The proposed Master Plan hazardous materials impacts discussed above under **Project Impacts and Mitigation Measures** focus on the use, transportation, storage, and disposal of hazardous materials and hazardous wastes during construction and occupancy of the proposed facilities. Construction-related hazardous materials impacts would generally be site-specific and limited to the duration of the construction activity, and would continue to be highly regulated under federal, state, and local regulations, and would therefore not result in a cumulatively considerable contribution to a cumulatively significant impact. With respect to the use, storage, transportation, and disposal of hazardous materials, the operation of the projects constructed under the proposed Master Plan will

comply with all applicable hazardous materials and waste laws. Similarly, other projects in this portion of Hayward that will use, store, transport, and dispose hazardous materials will also be required to comply with hazardous materials laws which are designed to avoid and minimize adverse impacts on public health, safety, and the environment. Furthermore it should be noted that the areas surrounding the Hayward campus are designated for residential, commercial, and open space uses and therefore will not likely be sources of existing or new substantial hazardous materials use. For reasons presented above, the cumulative impact would be less than significant.

Cumulative Impact Related to Increased Use of Hazardous Materials near School Sites

As stated above under **MP Impact HAZ-2**, the impact of growth in hazardous materials use on the campus under the proposed Master Plan on schools within 0.25 mile of the campus would be less than significant. Additionally, there is limited potential for a new school to be located within 0.25 mile of the campus, as the adjacent areas are largely developed or protected open space. Furthermore, Section 17213 of the Education Code (School Siting Code) requires that, prior to acquiring property for a new school, an environmental site investigation must be completed to determine the health and safety risks associated with a site. No schools are known to be proposed in the area and it can be assumed that none would be proposed or developed, should a significant risk be determined to exist. As such, the project's contribution to a cumulatively significant impact associated with hazardous emissions or hazardous materials handling near a school (should such a cumulative impact exist) is considered less than cumulatively considerable. The impact would be less than significant.

4.6.5 REFERENCES

California State University, East Bay. 2008. *Hazard Communication Plan*.

California State University, East Bay. 2008. *Asbestos Notification*.

Environmental Data Resources, Inc. 2008. *CSUEB Hayward Campus, Inquiry Number: 2179201.1s*.