# INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

## STATE CLEARINGHOUSE NUMBER: 2016052015

# MERIDIAN 25 OFFICE PROJECT

# ERRATA

## PURPOSE OF THE ERRATA SHEET

This errata document is intended to be amended to the Initial Study and Mitigated Negative Declaration (IS/MND) for the proposed Meridian 25 Office Project (Project).

The revisions in this document are considered minor only and not "substantial revision" that would trigger recirculation of the IS/MND under CEQA Guidelines Section 15073.5. These revisions do not identify a new significant effect, or revise findings of the residual levels of effects.

## REVISIONS TO THE IS/MND

The following are minor text changes, additions or modifications made to the IS/MND to reflect the applicant's voluntary coordination with EPA for construction-period remediation of the site.

A page number from the IS/MND and explanation of each revision is included *in italics* preceding each revision.

Existing and revised IS/MND text is indented. Deletions are noted by ~~strikethrough~~; additions are <u>underlined</u>.

*Pages 11-12: The summary of impact and mitigation measure Haz-1 on page 11 and 12 is hereby changed consistent with the revisions to pages 33-34, specified below.*

*Pages 33-34: The following changes are made under the Hazardous Materials Site and Accidental Release discussion in the Hazards and Hazardous Materials to reflect coordination with EPA. Per CEQA Guidelines section 15074.1, the revised mitigation measure is "equivalent or more effective" than that reported in the Mitigated Negative Declaration and does not require recirculation of the IS/MND.*

b, d) Hazardous Materials Site and Accidental Release.

A Phase I Environmental Site Assessment was prepared for the Project by PES Environmental, Inc. (Dec 15, 2014) and is available as part of the Project application. The following conclusions are informed by that document.

The 837 Industrial Road site has been undergoing monitoring (via well MW-1) and conducting operation and maintenance (O&M) for soil and tar-like materials containing diesel, motor oil, PCBs, PAHs, and metals, which was discovered at the site in 2008. While unconfirmed, the source of this contamination is thought to have been from historical (prior to the construction of the existing buildings) undocumented dumping of oil recycling waste by a nearby oil recycling

business. The material is currently managed via onsite O&M sump and recovery trench system, and recovered material is disposed offsite as hazardous waste.

Additionally, low levels of chlorinated solvents (PCE and TCE) are monitored in the groundwater at the site at concentrations generally below levels that would be considered a vapor intrusion concerns. The source of these contaminants is believed to be off-site (including G-C Lubricants site at 977 Bransten Road).

A Final Removal Action Workplan (RAW) was approved by DTSC on October 29, 2014, which considered the site safe for continued operation given capped soil, O&M activities described above, and ongoing groundwater monitoring. A change to office use is allowable at the site under the RAW ~~and disturbance of the site will require a Soil Management Plan, prior written approval by DTSC, and likely a new or revised RAW. If the tar-like material is not fully removed during construction activities, ongoing O&M will likely be required as a part of the RAW~~.

During redevelopment of the site, extensive environmental remediation will take place. This level of remediation will be governed and supervised pursuant to an agreement with the Environmental Protection Agency (EPA) to remove and remediate the soils at the site. The agreement will specify standards and conditions with which the remediation must take place and also provides for measures to protect the future project users, including measures such as the use of vapor barriers to protect air quality inside the buildings.

Unrelated to the above, the Town and Country Cleaners operated a dry cleaning operation at the Project site (887 Industrial Road, Suite B) between 1982 and 1992 and was known to use PCE-based solvents. The documentation is lacking and there is no record of assessment of the possibility of contamination with PCE solvents.

Because of the age of the existing buildings, there is also the possibility for hazardous material from asbestos-containing materials and lead-based paint that could be released during demolition activities.

Mitigation Measure

**Haz-1: Compliance with Removal Action Workplan ~~and~~ (DTSC) and EPA Requirements.** The applicant shall demonstrate proposed compliance with the ongoing DTSC requirements related to known contamination in the soil and groundwater, including the Removal Action Workplan~~.~~. As part of the redevelopment of the site, and prior to initiation of construction activities, the applicant shall enter into an agreement with the EPA to remove and remediate the souls at the project site. ~~and shall demonstrate compliance with DTSC post-construction requirements prior to occupancy.~~ Construction activities on the project site shall conform to the standards and conditions outlined in this agreement.

**Haz-2: Lead-Based Paint and Asbestos Abatement**. Prior to demolition, the applicant shall demonstrate that buildings have been assessed for asbestos-containing materials and lead-based paint and that any suspected such materials have been abated by a licensed abatement contractor and disposed of according to all state and local regulations.

**Haz-3: Assessment for Presence of Potentially Hazardous Materials at the Former Dry Cleaners at 887 Industrial Road.** Due to the largely undocumented usage of PCE solvents at the former Town and Country Cleaners operated at 887 Industrial Road,

Suites B and C of this building including associated sewer lines shall be investigated for PCE contamination prior to demolition and any resultant regulatory requirements followed if contamination is discovered, which could include removal and disposal according to relevant regulations and/or an ongoing monitoring plan that would be managed through DTSC.

Implementation of mitigation measures Haz-1 through Haz-3 will reduce the impact related to a hazardous materials site and upset or accidents involving the release of hazardous materials into the environment to a level of less than significant with mitigation through assessment, abatement, and compliance with the existing RAW, coordination with EPA for site remediation, and other applicable regulations.