OMB Number: 2030-0020
Expiration Date: 06/30/2024

Preaward Compliance Review Report for All Applicants and Recipients Requesting EPA Financial Assistance

Note: Read Instructions before completing form.

I. A. Applicant/Recipient (Name, Address, City, State, Zip Code)

Name: City of South Gate

Address: 8650 California Avenue

City: South Gate

State: California Zip Code: 90280

B. Unique Entity Identifier (UEI):

C. Applicant/Recipient Point of Contact

Name: Carol Averell

Phone: (323) 563-9535

Email: caverell2@sogate.org

Title: Housing Manager

II. Is the applicant currently receiving EPA Assistance? ☐ Yes ☑ No

III. List all pending civil rights lawsuits and administrative complaints filed under federal law against the applicant/recipient that allege discrimination based on race, color, national origin, sex, age, or disability. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7.)

Not Applicable

IV. List all civil rights lawsuits and administrative complaints decided against the applicant/recipient within the last year that alleged discrimination based on race, color, national origin, sex, age, or disability and enclose a copy of all decisions. Please describe all corrective actions taken. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7.)

Not Applicable

V. List all civil rights compliance reviews of the applicant/recipient conducted under federal nondiscrimination laws by any federal agency within the last two years and enclose a copy of the review and any decisions, orders, or agreements based on the review. Please describe any corrective action taken. (40 C.F.R. § 7.80(c)(3))

Not Applicable

VI. Is the applicant requesting EPA assistance for new construction? If no, proceed to VII; if yes, answer (a) and/or (b) below.

☑ Yes ☐ No

a. If the grant is for new construction, will all new facilities or alterations to existing facilities be designed and constructed to be readily accessible to and usable by persons with disabilities? If yes, proceed to VII; if no, proceed to VI(b).

☑ Yes ☐ No

b. If the grant is for new construction and the new facilities or alterations to existing facilities will not be readily accessible to and usable by persons with disabilities, explain how a regulatory exception (40 C.F.R. 7.70) applies.

Not Applicable

VII. **Does the applicant/recipient provide initial and continuing notice that it does not discriminate on the basis of race, color, national origin, sex, age, or disability in its program or activities? (40 C.F.R 5.140 and 7.95)** ☑ Yes ☐ No

a. **Do the methods of notice accommodate those with impaired vision or hearing?** ☑ Yes ☐ No

b. **Is the notice posted in a prominent place in the applicant's/recipient's website, in the offices or facilities or, for education programs and activities, in appropriate periodicals and other written communications?** ☑ Yes ☐ No

c. **Does the notice identify a designated civil rights coordinator?** ☑ Yes ☐ No

VIII. **Does the applicant/recipient maintain demographic data on the race, color, national origin, sex, age, or disability status of the population it serves? (40 C.F.R. 7.85(a))** ☑ Yes ☐ No

IX. **Does the applicant/recipient have a policy/procedure for providing meaningful access to services for persons with limited English proficiency? (Title VI, 40 C.F.R. Part 7, *Lau v Nichols* 414 U.S. (1974))** ☑ Yes ☐ No

X. **If the applicant is an education program or activity, or has 15 or more employees, has it designated an employee to coordinate its compliance with 40 C.F.R. Parts 5 and 7? Provide the name, title, position, mailing address, e-mail address, fax number, and telephone number of the designated coordinator.**

Not Applicable

XI. **If the applicant is an education program or activity, or has 15 or more employees, has it adopted grievance procedures that assure the prompt and fair resolution of complaints that allege a violation of 40 C.F.R. Parts 5 and 7? Provide a legal citation or applicant's/ recipient's website address for, or a copy of, the procedures.**

Not Applicable

For the Applicant/Recipient

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. I assure that I will fully comply with all applicable civil rights statutes and EPA regulations.

A. Signature of Authorized Official	B. Title of Authorized Official	C. Date
Completed by Grants.gov upon submission.		Completed by Grants.gov upon submission.

For the U.S. Environmental Protection Agency

I have reviewed the information provided by the applicant/recipient and hereby certify that the applicant/recipient has submitted all preaward compliance information required by 40 C.F.R. Parts 5 and 7; that based on the information submitted, this application satisfies the preaward provisions of 40 C.F.R. Parts 5 and 7; and that the applicant has given assurance that it will fully comply with all applicable civil rights statures and EPA regulations.

A. *Signature of Authorized EPA Official	B. Title of Authorized Official	C. Date

EPA KEY CONTACTS FORM

OMB Number: 2030-0020
Expiration Date: 06/30/2024

Authorized Representative: *Original awards and amendments will be sent to this individual for review and acceptance, unless otherwise indicated.*

Name: Prefix: | First Name: Carol | Middle Name:
Last Name: Averell | Suffix:
Title: Housing Manager
Complete Address:
Street1: 8650 California Avenue
Street2:
City: South Gate | State: California
Zip / Postal Code: 90280 | Country: USA
Phone Number: (323) 563-9535 | **Fax Number:**
E-mail Address: caverell2@sogate.org

Payee: *Individual authorized to accept payments.*

Name: Prefix: | First Name: Carol | Middle Name:
Last Name: Averell | Suffix:
Title: Housing Manager
Complete Address:
Street1: 8650 California Avenue
Street2:
City: South Gate | State: California
Zip / Postal Code: 90280 | Country: USA
Phone Number: (323) 563-9535 | **Fax Number:**
E-mail Address: caverell2@sogate.org

Administrative Contact: *Individual from Sponsored Programs Office to contact concerning administrative matters (i.e., indirect cost rate computation, rebudgeting requests etc).*

Name: Prefix: | First Name: Vanessa | Middle Name:
Last Name: Delgado | Suffix:
Title: President, Azure Community Development
Complete Address:
Street1: 944 South Greenwood Avenue
Street2:
City: Montebello | State: California
Zip / Postal Code: 90640 | Country: USA
Phone Number: (323) 477-1160 | **Fax Number:**
E-mail Address: vanessa@azuredevelopmentco.com

EPA KEY CONTACTS FORM

Project Manager: *Individual responsible for the technical completion of the proposed work.*

Name: Prefix: | First Name: Vanessa | Middle Name:

Last Name: Delgado | Suffix:

Title: President, Azure Community Development

Complete Address:

Street1: 944 South Greenwood Avenue

Street2:

City: Montebello | State: California

Zip / Postal Code: 90640 | Country: USA

Phone Number: (323) 477-1160 | **Fax Number:**

E-mail Address: vanessa@azuredevelopmentco.com

NARRATIVE INFORMATION SHEET

1. Applicant Identification
   City of South Gate
   8650 California Avenue
   South Gate, CA 90280

2. Funding Requested
   a. **Grant Type**: Single Site Cleanup
   b. **Federal Funds Requested**: $500,000

3. Location
   a. City of South Gate
   b. Los Angeles County
   c. State of California

4. Property Information
   Alma Townhomes
   7916 Long Beach Boulevard
   South Gate, CA 90280

5. Contacts
   a. Project Director
   Ms. Carol Averell, Housing Manager
   8650 California Avenue
   South Gate, CA 90280
   Email: cavererll2@sogate.org
   Phone Number: (323) 563-9535

   b. Highest Ranking Elected Official
   Honorable Mayor Maria del Pilar Avalos
   8650 California Avenue
   South Gate, CA 90280
   Email: mpavalos@sogate.org
   Phone Number: (323) 563-9543

6. Population
   92,726

7. Other Factors

Information on the Other Factors	**Page #**
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The reuse of the proposed cleanup site will incorporate energy efficiency measures.	

8. Releasing Copies of Applications
   No confidential information is contained in these materials.

THRESHOLD CRITERIA RESPONSES

1. Applicant Eligibility
   The City of South Gate (the "City") is a municipal corporation of the State of California located in Los Angeles County.

2. The City has not been awarded a Cleanup Grant.

3. Site Ownership Information
   The property subject to this grant request is owned by the City of South Gate through a negotiated fee simple purchase in 1979 from Lindt-Wilson Motors Inc. The City held ownership until it was transferred by operation of law to its Successor Agency pursuant to the redevelopment dissolution in 2012. The City of South Gate meets the requirements for asserting an affirmative defense to CERCLA liability given the date of purchase.

4. Basic Site Information ("Site")
   Alma Townhomes
   Address: 7916 Long Beach Boulevard, South Gate, California, 90280

5. Status of History of Contamination at the Site
   The Site is a former auto body shop (formerly operated as Freedom Ford) and is known to have had an onsite leaking underground storage tank ("LUST"). In 1997, seven (7) hydraulic lifts, one clarifier and 83 tons of petroleum-impacted soils were removed. Remaining soils in the area of excavation were below Los Angeles Regional Water Quality Control Board ("Water Board") guidelines. In 2012, the Water Board requested subsurface soil vapor investigation to determine if residual VOCs posed a potential for human health risk. The Site has remained underutilized to date.

6. Does the Site Meet the Definition of a Brownfield Site?
   Yes, the site meets the definition of a brownfield site and is not listed or proposed for listing on the National Priorities List. The Site is also not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. And finally, the Site is not subject to the jurisdiction, custody, or control of the US government.

7. Description of the Environmental Assessment Conducted at the Site
   The Site has undergone prior environmental investigations to evaluate former land uses including a gasoline service station and automotive repair activities. The following technical documents and/or correspondence are available:

   1. SCS Engineers, October 2001, Additional Soil Investigation/Site-Wide Confirmation Sampling Workplan Former Freedom Ford Site, 7916 Long Beach Boulevard, South Gate, California.

   2. Los Angeles Regional Water Quality Control Board, January 2012, Request for Subsurface Soil Vapor Investigation Work Plan, City of South Gate Former Freedom Ford, 7916 Long Beach Boulevard, South Gate, CA.

   3. Los Angeles Regional Water Quality Control Board, August 2017, 2017-2018 Annual Estimation Letter for Site Cleanup Cost Recovery Program, City of South Gate Former Freedom Ford, 7916 Long Beach Boulevard, South Gate, CA.

4. City of South Gate, April 2018, Response to January 10, 2012, Letter Request for Subsurface Soil Vapor Investigation Work Plan, 7916 Long Beach Boulevard, South Gate, CA.

5. Geocon West, Inc., 2018, Soil Vapor Survey, Former Freedom Ford, 7916 Long Beach Boulevard, South Gate, California.

The purpose of the investigations was to evaluate known or suspected releases from former USTs, a clarifier, a service pit, floor drains, hydraulic lifts, auto service bays, and visibly stained soils. It was reported that two USTs, seven hydraulic lifts, one clarifier, and a reported 83 tons of petroleum- impacted soil were removed from the Site as part of prior Site work.

According to SCS, preliminary investigation completed in November 1991 consisted of a regulatory records review, a geophysical survey and 25 exploratory borings. Certain soils in the vicinity of the former gasoline UST, the service pit, hydraulic lifts, and the clarifier contained detectable concentrations of total petroleum hydrocarbons (TPH) as gasoline and as total recoverable petroleum hydrocarbons (TRPH). TPH concentrations ranged from 10 milligrams per kilogram (mg/kg) to 18,000 mg/kg. Although a permit listed an additional 1,000-gallon tank at the Site, which was not mentioned in a 1988 UST closure report, no tanks were detected during a geophysical survey conducted during SCS's investigation. It was determined that the 1,000-gallon tank appeared to either have been removed or never existed.

A subsequent investigation by SCS in March 1992 was performed and included advancing 19 exploratory borings. Analytical data from soil samples collected in the vicinity of the former gasoline UST indicated that the 15 to 25-foot soil depths were impacted with TPH at concentrations up to 18,200 mg/kg. Results from samples collected in the service pit within the building indicated detectable concentrations of fuel hydrocarbons including TRPH, benzene, toluene, ethylbenzene, and total xylenes (BTEX). Soil samples collected in the vicinity of the hydraulic lifts in the building yielded TRPH concentrations ranging from 1,420 mg/kg to 16,900 mg/kg. At the completion of the March 1992 investigation, the lateral limits of petroleum- impacted soil detected south, east, and west of the former UST had not been defined. Removal of the wastewater clarifier, hydraulic lifts, associated contaminated soils, and soil beneath the service pit was recommended.

In May 1993, SCS performed another Phase II investigation, which consisted of advancing five exploratory borings, three of which were converted into groundwater monitoring wells. Groundwater samples collected from the wells detected trace concentrations of toluene and total xylenes. Based on this and previous soils data, it was concluded that the western and eastern extent of contamination had been defined.

In August through September 1997, SCS oversaw the removal of seven hydraulic lifts, one clarifier, and a reported 83 tons of petroleum-impacted soils. Remaining soils in the area of the excavations were below Water Board guidelines of 1,000 mg/kg TPH in the C13 to C22 range. The Los Angeles Regional Water Quality Control Board ("Water Board") requested additional soil investigation in the vicinity of previous borings BH-l, BH-2, BH-9, BH-10, BH-11, BH-12, BH-27, BH-28, and MW-3 to better define the vertical and lateral extent of soil contamination.

According to the Site Closure Report prepared by SCS, the extent of hydrocarbon-impacted soil at the Site had been defined. SCS concludes that the "impacted soil appears to be confined to the area of the former UST in the southwestern portion of the Site. Significantly impacted soil was reportedly limited to a depth of 20 feet bgs. Groundwater samples were found to contain no contaminants of concern."

On January 10, 2012, the Water Board sent a letter to the City of South Gate requesting submittal of a Workplan to conduct a subsurface soil vapor investigation, the purpose of which was to determine if residual VOCs posed a potential human health risk. On May 4, 2018, Geocon

performed a soil vapor survey that included advancing 10 soil vapor probes (identified as SV-1 through SV-10) within the Site structure and parking lot area. The probes were set at five (5) feet bgs and soil vapor samples were collected and analyzed for VOCs (including chlorinated solvents) via EPA Method 8260B. Tetrachloroethene (PCE) was detected in four of the 10 soil vapor samples and at concentrations ranging from 0.10 micrograms per liter (µg/l) (SV-5) to 0.60 µg/l (SV-9). No other VOCs were detected above the laboratory reporting limits.

Geocon compared the PCE concentrations to applicable screening levels to further evaluate the potential for vapor intrusion into the Site structure. A residential and commercial/industrial PCE soil vapor screening level was calculated to be 0.46 µg/l and 2.0 µg/l, respectively. None of the detected PCE soil vapor concentrations exceeded the commercial/industrial screening level of 2.0 µg/l, while one soil vapor sample (SV-5 at 0.60 µg/l) exceeded the residential screening level.

8. Is the Site Required to be Enrolled in a State or Tribal Voluntary Response Program?
   The Site is subject to an open Los Angeles Regional Water Quality Control Board (the "Water Board") case with oversight under File No. 0475B, Site ID. 2040191. The City, through its subrecipient, will enroll the cleanup plan for oversight. Additional soil vapor characterization may be required as the land use proposed is residential but can be performed before June 15, 2024.

9. Information of Enforcement Onsite
   There are no known ongoing or anticipated environmental enforcement or other actions related to the Site for which this Brownfields Grant funding is sought.

10. Property-specific Determination
    A Property-specific Determination is not required for this Brownfields Grant request.

11. Cleanup Authority and Oversight Structure
    The Cleanup will be overseen through the direct oversight from the Water Board. There is no indication based on-site data collected that contaminants have migrated off-site nor that adjacent properties will need to be accessed. Groundwater samples were found to contain no contaminants of concern.

12. Community Notification Documents
    An ABCA has been drafted and made available for public comment. A Community Notification Ad was posted on October 27, 2023, in the Wave Publication. A Public Meeting was held virtually on November 9, 2023, with Spanish translation available. Documentation of comments received meeting notes and a participant list are enclosed.

13. Subrecipient
    The City has entered into a Purchase and Sale Agreement for development of the property into affordable housing with Azure Community Development ("Azure"). Azure is a subrecipient of this application, is registered as a 501c3, and will be assisting in the implementation of the proposed cleanup. No other contractors have been selected for this Brownfield Grant request.

DRAFT ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – PRELIMINARY EVALUATION

ALMA TOWNHOMES, 7916 LONG BEACH BOULEVARD,
SOUTH GATE CA 90280
State Tracking Number: TBD

Prepared by City of South Gate and Azure Community Development

I. INTRODUCTION AND BACKGROUND

a. Site Location

The subject property is approximately 17,896 square feet located at 7916 Long Beach Boulevard (APNs 6202-010-900 and 6202-010-901) (herein referred to as the "Site").

b. Previous Site Use(s) and any previous cleanup/remediation

The Site is a former auto body shop (formerly operated as Freedom Ford) and is known to have had an onsite leaking underground storage tank ("LUST"). The Site is subject to an open site assessment case pending with Los Angeles Regional Water Quality Control Board ("Water Board"). In 1997, seven (7) hydraulic lifts, one clarifier and 83 tons of petroleum-impacted soils were removed. Remaining soil in the area of excavation were below guidelines. In 2012, the Water Board requested subsurface soil vapor investigation to determine if residual VOCs posed a potential for human health risk. The Site has remained vacant and underutilized to date.

c. Site Assessment Findings

The Site has undergone prior environmental investigations to evaluate former land uses including a gasoline service station and automotive repair activities. The following technical documents and/or correspondence are available:

1. SCS Engineers, October 2001, Additional Soil Investigation/Site-Wide Confirmation Sampling Workplan Former Freedom Ford Site, 7916 Long Beach Boulevard, South Gate, California.

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According to SCS, preliminary investigation completed in November 1991 consisted of a regulatory records review, a geophysical survey and 25 exploratory borings. Certain soils in the vicinity of a former gasoline UST, the service pit, hydraulic lifts, and the clarifier contained detectable concentrations of total petroleum hydrocarbons (TPH) as gasoline and as total recoverable petroleum hydrocarbons (TRPH). TPH concentrations ranged from 10 milligrams per

kilogram (mg/kg) to 18,000 mg/kg. Although a permit listed an additional 1,000-gallon tank at the Site, which was not mentioned in a 1988 UST closure report, no tanks were detected during a geophysical survey conducted during SCS's investigation. It was determined that the 1,000-gallon tank appeared to either have been removed or never existed.

A subsequent investigation by SCS in March 1992 was performed and included advancing 19 exploratory borings. Analytical data from soil samples collected in the vicinity of the former gasoline UST indicated that the 15 to 25-foot soil depths were impacted with TPH at concentrations up to 18,200 mg/kg. Results from samples collected in the service pit within the building indicated detectable concentrations of fuel hydrocarbons including TRPH, benzene, toluene, ethylbenzene, and total xylenes (BTEX). Soil samples collected in the vicinity of the hydraulic lifts in the building yielded TRPH concentrations ranging from 1,420 mg/kg to 16,900 mg/kg. At the completion of the March 1992 investigation, the lateral limits of petroleum- impacted soil detected south, east, and west of the former UST had not been defined. Removal of the wastewater clarifier, hydraulic lifts, associated contaminated soils, and soil beneath the service pit was recommended.

In May 1993, SCS performed another Phase II investigation, which consisted of advancing five exploratory borings, three of which were converted into groundwater monitoring wells. Groundwater samples collected from the wells detected trace concentrations of toluene and total xylenes. Based on this and previous soils data, it was concluded that the western and eastern extent of contamination had been defined.

In August through September 1997, SCS oversaw the removal of seven hydraulic lifts, one clarifier, and a reported 83 tons of petroleum-impacted soils. Remaining soils in the area of the excavations were below Water Board guidelines of 1,000 mg/kg TPH in the C13 to C22 range. The Los Angeles Regional Water Quality Control Board ("Water Board") requested additional soil investigation in the vicinity of previous borings BH-l, BH-2, BH-9, BH-10, BH-11, BH-12, BH-27, BH-28, and MW-3 to better define the vertical and lateral extent of soil contamination.

According to the Site Closure Report prepared by SCS, the extent of hydrocarbon-impacted soil at the Site had been defined. SCS concludes that the "impacted soil appears to be confined to the area of the former UST in the southwestern portion of the Site. Significantly impacted soil was reportedly limited to a depth of 20 feet bgs. Groundwater samples were found to contain no contaminants of concern."

On January 10, 2012, the LARWQCB sent a letter to the City of South Gate requesting submittal of a Workplan to conduct a subsurface soil vapor investigation, the purpose of which was to determine if residual VOCs posed a potential human health risk. On May 4, 2018, Geocon performed a soil vapor survey that included advancing 10 soil vapor probes (identified as SV-1 through SV-10) within the Site structure and parking lot area. The probes were set at five (5) feet bgs and soil vapor samples were collected and analyzed for VOCs (including chlorinated solvents) via EPA Method 8260B. Tetrachloroethene (PCE) was detected in four of the 10 soil vapor samples and at concentrations ranging from 0.10 micrograms per liter (µg/l) (SV-5) to 0.60 µg/l (SV-9). No other VOCs were detected above the laboratory reporting limits.

Geocon compared the PCE concentrations to applicable screening levels to further evaluate the potential for vapor intrusion into the Site structure. A residential and commercial/industrial PCE soil vapor screening level was calculated to be 0.46 µg/l and 2.0 µg/l, respectively. None of the detected PCE soil vapor concentrations exceeded the commercial/industrial screening level of 2.0 µg/l, while one soil vapor sample (SV-5 at 0.60 µg/l) exceeded the residential screening level.

d. Project Goal

The remediation of the Site will create eleven (11) affordable residential units called Alma Townhome Project. The homes will be restricted to a sales price affordable to families making at the Los Angeles County 80% area median income. In addition, the City and Azure Community

Development have applied to the State of California for silent-second down payment assistance loan of $200,000 per home.

The City of South Gate's General Plan designates the parcels as urban neighborhood (UN) zone. This zone is described as: *"intended for areas adjacent to or surrounding major community corridors to provide retail and service uses in a more automotive-oriented setting and to provide buildings that transition to adjacent established neighborhoods. The UN zone promotes the blending of housing, retail and services, office, and civic uses. Physical Character. The physical environment should be characterized by medium- to high-density housing, occasionally accented by neighborhood-serving retail, office, and restaurants. Urban, pedestrian-oriented townhomes and rowhomes are envisioned along Long Beach Boulevard…"* The Project is designed as envisioned in the General Plan and represents a unique opportunity to provide affordable housing in this attractive new addition at an entrance to the City.

The Project is designed to minimize impacts to the adjacent community with a modest density and ample open space. Noise and traffic will be minimal given the number of units proposed. The development of the Project includes for-sale units only and is expected to have a positive effect on the use, enjoyment and valuation of adjacent properties.

II. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

a. Cleanup Oversight Responsibility

The Site is subject to an open Los Angeles Regional Water Quality Control Board (the "Water Board") case with oversight under File No. 0475B, Site ID. 2040191.

b. Cleanup Standards for Major Contaminants

It is anticipated that state DTSC residential standards will be used to guide the cleanup. It is possible that risk-based standards will be generated for compounds of concern, in accordance with OEHHA regulations.

c. Laws & Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfield Revitalization Act, the Federal Davis-Bacon Act, State of California environmental law, County of Los Angeles law, and City of South Gate laws, policies and procedures. Federal, state and local laws regarding procurement of contractors to conduct the cleanup will be followed.

In addition, all appropriate permits (e.g. notify before you dig, soil transport/disposal manifests) will be obtained prior to the work commencing.

III. EVALUATION OF CLEANUP ACTIVITIES

a. Cleanup Alternatives Considered

To address contamination at the Site, there (3) different alternatives were considered, including Alternative No. 1: No Action, Alternative No. 2: Capping, and Alternative No. 3: Excavation with Offsite Disposal.

b. Cost Estimate of Cleanup Alternatives

Effectiveness of each Alternative:

a. Alternative No. 1: No Action is not effective in controlling or preventing the exposure of receptors to contamination at the Site.

b. Alternative No. 2: Capping is an effective way to prevent receptors from coming into direct contact with contaminated soils, if the cap is maintained. However, capping is not an effective way to control other exposures, such as the direct contract risks for residents and the vapor intrusion risk to the commercial worker. In addition, this alternative would not allow for residential land use development on-site and the need for affordable is dire in the City.

c. Alternative No. 3: Excavation with Offsite Disposal is an effective way to eliminate any remaining risk at the Site since contamination will be removed and the exposure pathways will no longer exist.

Implementation of each Alternative:

a. Alternative No. 1: No Action can be implemented by leaving the site in its current blighted state.

b. Alternative No. 2: Capping is relatively easy to implement, although ongoing monitoring and maintenance of the cap will require periodic coordination and reporting. This alternative would require restricted land use and thus the most difficult to implement given the State of California's urgent need for affordable housing.

c. Alternative No. 3: Excavation with Offsite Disposal is moderately difficult to implement. Coordination (e.g., dust suppression and monitoring) during cleanup activities and short-term disturbance to the community (e.g., trucks transporting contaminated soils and backfill) are anticipated. However, ongoing monitoring and maintenance will not be required following excavation and offsite disposal.

Cost of each Alternative:

a. Alternative No. 1: No Action requires no cost.

b. Alternative No. 2: Capping will cost approximately $95,000.

c. Alternative No. 3: Excavation with Offsite Disposal will cost approximately $375,000 plus the cost of report preparation, permitting and oversight.

c. <u>Recommended Cleanup Alternative</u>

The cleanup alternative recommended is Alternative No. 3: Excavation with Offsite Disposal. Alternative No. 1: No Action cannot be recommended since it does not address site risks. Alternative No. 2: Capping is less expensive than excavating soils and disposing of them off-site. However, Alternative No. 2: Capping would require ongoing monitoring and maintenance of the cap, the ongoing concern of vapor intrusion risks and the implementation of a land use restriction. For these reasons, Alternative No. 3 is recommended.

Green and Sustainable Remediation for the Selected Alternative

To make the selected alternative more sustainable, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort. The selected cleanup contractor will be required to follow an idle-reduction policy and use heavy equipment with advanced emissions controls. The number of mobilizations to the Site will be minimized and erosion control measures will minimize runoff into environmentally sensitive areas. In addition, the Request for Proposals for a cleanup contractor will include recommendations for additional green remediation techniques.