



Chapter 6

Hazards & Hazardous Materials

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Introduction

This background report creates a foundation for updating goals, policies, and programs in the *Suisun City General Plan* related to hazards and hazardous materials. This report summarizes relevant regulatory information and provides a snapshot of existing hazardous conditions—primarily human created—that may affect the City's Sphere of Influence.

The City's actions have the potential to expose people risks from hazardous materials through project approvals and construction, both for private and public projects, as well as by permitting operations that involve the generation, handling, or transport of hazardous materials. This report discusses key issues and opportunities to consider in development of the General Plan Update to reduce such risks.

Hazardous conditions related to soils and seismic activity are addressed in the Geology and Soils Background Report. Hazards related to flooding are addressed in the Hydrology and Water Quality Background Report.

Environmental Setting

Hazards that may potentially have an effect on implementation of Suisun City's General Plan include toxic material, hazardous waste and disposal, toxic releases, leaking underground storage tanks (LUSTs), brownfields, and Travis Air Force Base (Travis AFB).¹ The following section describes the existing conditions in Suisun City and its vicinity.

Recorded Hazardous Material Sites

A search of the Department of Toxic Substances Control's (DTSC) GeoTracker web site found three records of known hazardous material sites that are scheduled for investigation, remediation, or are under remediation and thirteen sites that have completed remediation (DTSC September 2010). , are remediated, or do not need remediation. Woody's Bait Shop at 1101 Highway 12 is open, inactive (meaning that the property owner is not taking any action and the State Water Resources Control Board has not issued a clearance letter). Sheldon Oil Company at 526 School Street is under investigation and is taking interim remediation actions. Crystal Middle School at 100 Cordelia Street is currently under remediation and is described in the following subsection. Most of these sites were reported to DTSC by the Solano County Resource Management Department in its role as regulator of hazardous material use. The database search included Federal Superfund sites, State response sites, voluntary cleanup sites, school cleanups, evaluation sites, school investigation sites, military evaluations, tiered permit sites, corrective action sites, and hazardous waste permit sites. Exhibit HAZ-1 shows the hazardous material sites in the City and its vicinity on record with DTSC.

¹ "Brownfields" are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance or waste, pollutant, or contaminant. In the EnviroStor database, brownfields are designated as a facility or site, or portion thereof, of industrial or commercial property that is abandoned or underused, and often environmentally contaminated – especially one considered as a potential site for redevelopment or other reuse.

Leaking Underground Storage Tanks

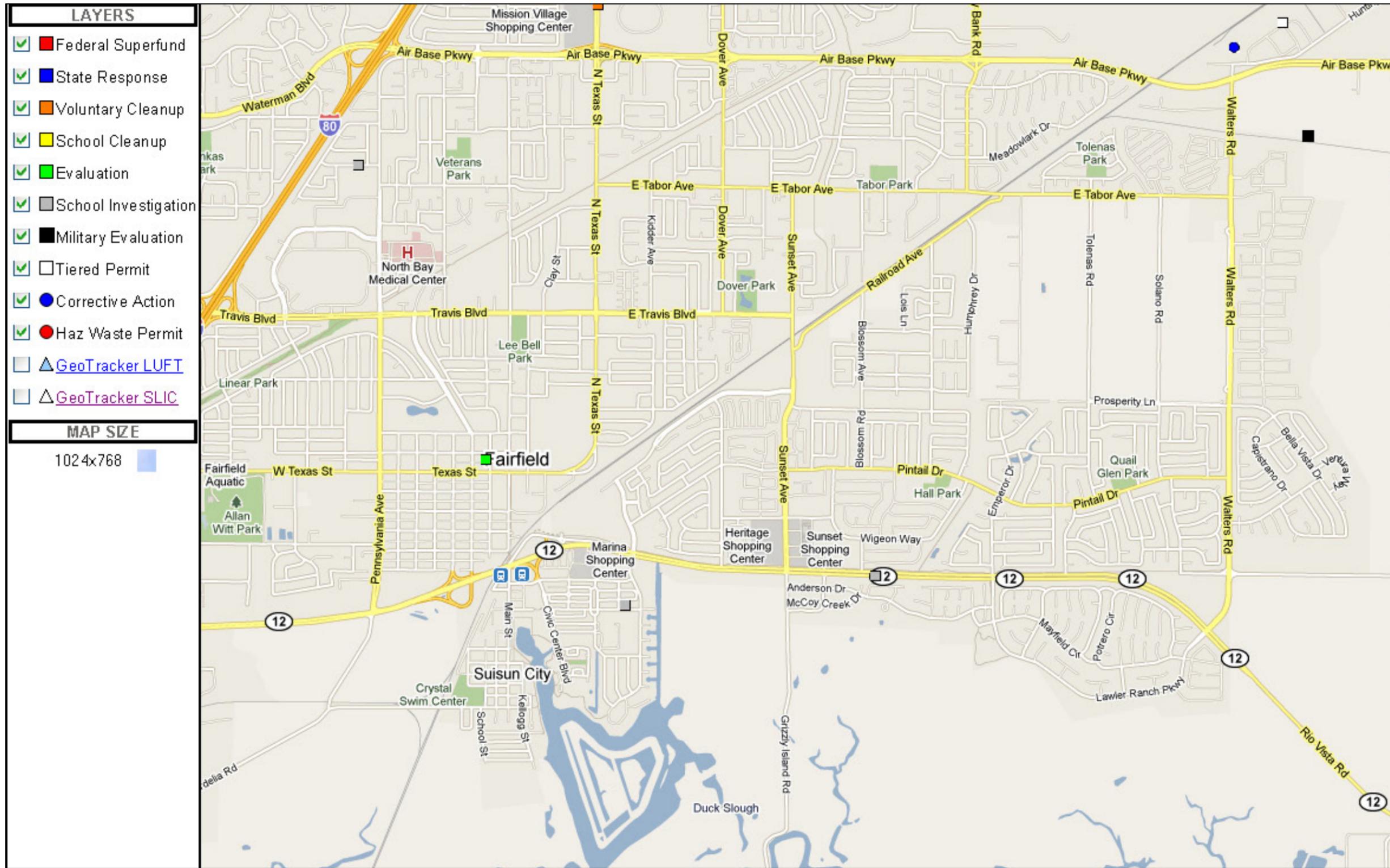
Underground storage tanks (USTs) containing hazardous substances are subject to monitoring for leakage (Exhibit HAZ-2). Most of these tanks store petrochemicals and fuels, are double walled, and are equipped with electronic systems to detect leaks. All tanks are permitted annually by the County Resource Management Department. All new tanks and tank repairs are permitted for installation by Resource Management.

Crystal Middle School is the only site with LUSTs in the City. Contaminants of concern are heating oil/fuel oil. An August 2010 soil excavation work plan calls for the removal of soil around the former tank and to remove the bottom of the tank (constructed of concrete-walls of tank were reported to be made of redwood). An estimated 560 cubic yards of soil will be removed.

Cleanup Sites

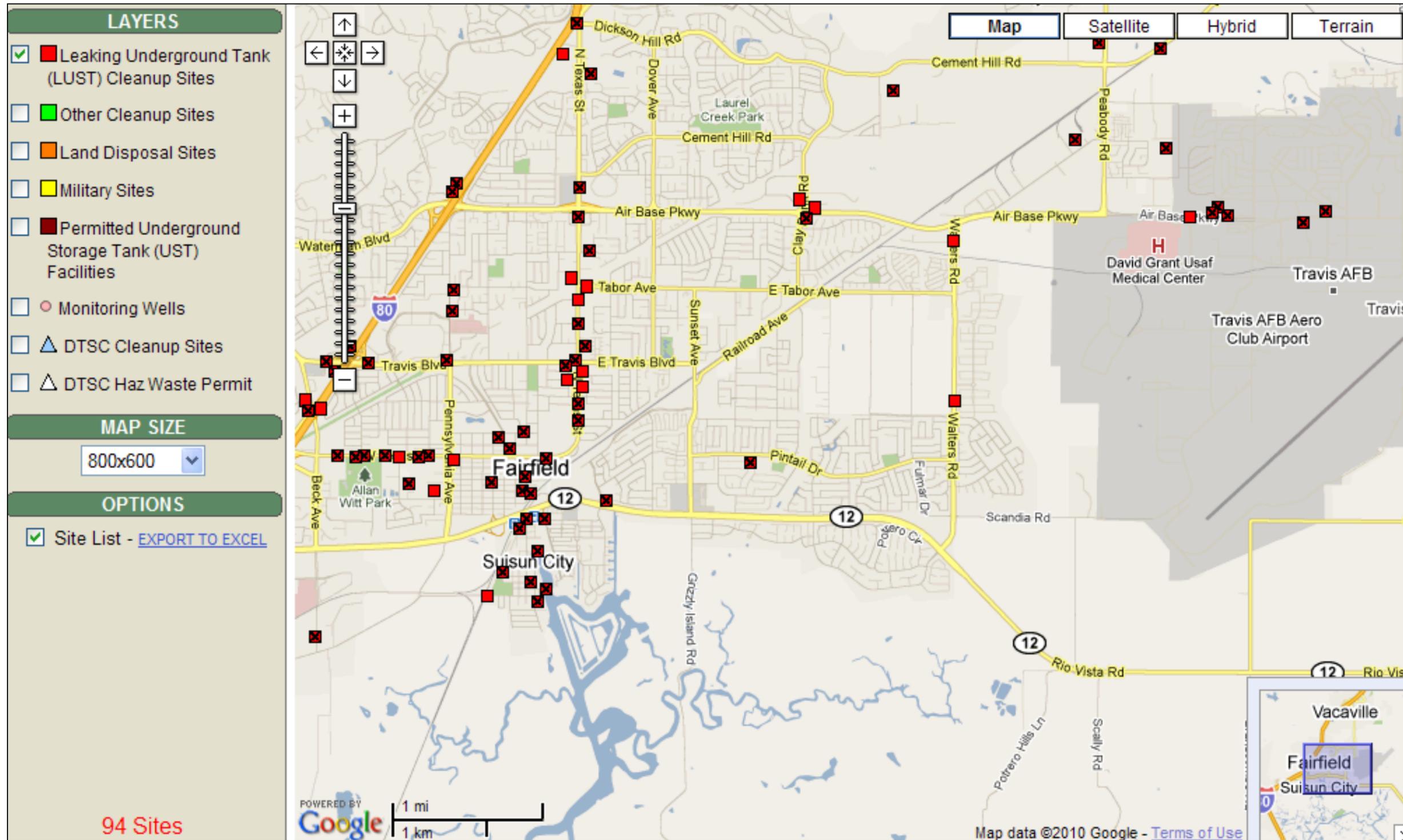
A search of the DTSC GeoTracker web site (DTSC September 2010) identified "Other Cleanup Sites" in Suisun City, as summarized below.

- **Sheldon Oil Company**, located in the downtown area, is an open cleanup site involving chlorinated solvents.
- **Woody's Bait Shop**, located south of State Route 12, is open, inactive and the information of the nature of hazardous materials at the site is not available.



Source: Department of Toxic Substances Control 2010
Exhibit HAZ-1

Hazardous Materials Sites



Source: Department of Toxic Substances Control 2010
 Note: Exhibit shows both open and closed records on the database.
Exhibit HAZ-2

Leaking Underground Storage



Travis Air Force Base

Travis AFB, adjacent to Suisun City's Sphere of Influence to the east, encompasses approximately 5,025 acres. The Base was placed on the EPA National Priorities List in 1989 as a Superfund project.

Travis AFB is also a permitted hazardous waste facility that handles PCB-contaminated waste and PCB-containing equipment, such as electrical transformers. Travis AFB submitted a work plan titled "Closure of RCRA Permitted PCB Hazardous Waste Storage Facility Building 956" in June of 1999 that required sampling to chemically characterize the constituents of potential concern at the site, decontamination of contaminated structures, sampling to verify the effectiveness of the decontamination effort, and disposal of waste materials. In 2007, Travis AFB submitted the "Final Project Closure Report, Building 956, PCB Hazardous Waste Storage Facility" summarizing the decontamination project that was previously proposed.

Pipelines

Several pipeline releases affecting different areas of Solano County have been reported (County of Solano Department of Environmental Health 1998, EPA 2005). A Santa Fe Pacific pipeline failed in 1994 in the vicinity of Peabody and Vanden Roads. An unknown amount of fuel was lost and at least 218 gallons are known to have been removed. A collection and treatment system was installed in the summer of 1997 and is currently operating. The lead agency for this cleanup is the SFRWQCB.

On April 27, 2004, a corroded underground fuel pipeline owned and operated by Kinder Morgan Energy Partners that runs through Suisun Marsh ruptured and spilled over 103,000 gallons of diesel fuel into the State's largest tidal wetland, home to migratory waterfowl and the endangered salt marsh harvest mouse. The U.S. Coast Guard and the pipeline owner took initial measures to recover the fuel and prevent it from spreading, but called on EPA to clean up and restore the marsh. By September 2004, after the work was done, 616 tons of contaminated soil had been removed. Tests showed that the mud remaining in the marsh no longer posed a threat to the environment.

The Southern Pacific Pipeline Co. has two petroleum pipelines that parallel the Union Pacific Railroad from Suisun City to Benicia. In February of 2009, a leak occurred from a pipeline described on the DTSC web site as "JP-8 Travis Pipeline" just northeast of Suisun City. The leak was stopped the day after the leak was reported. The site is under investigation for soil contamination according to the DTSC's "Geotracker" online database.

Transportation of Hazardous and Toxic Materials

Although state law does not specifically require hazards associated with the transport of cargo to be addressed in general plans, they are addressed in the State Health and Safety Codes. For this reason, it is important to assess potential dangers associated

with hazardous materials transport and that State regulations regarding hazardous cargo are monitored.

The potential for hazardous materials transport does exist in the Suisun City area, due to the fact that a number of major, interstate transportation routes pass through the area and a wide range of hazardous cargo are regularly transported along these routes. Types of hazardous materials regularly transported out of, into, and through Solano County by freeway or railroad include flammable liquids, corrosive materials, compressed and/or poisonous gases, explosives, flammable solids, and irritating materials. The Local Hazards Mitigation Plan, being prepared concurrently with the General Plan Update, will address how the City will respond to hazardous and toxic materials emergencies such as truck and train spills.

Asbestos

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. Asbestos is commonly used as an acoustic insulator, thermal insulation, fireproofing, and in other building materials. Asbestos is made up of microscopic bundles of fibers that may become airborne when asbestos-containing materials are damaged or disturbed. When these fibers get into the air, they may be inhaled into the lungs, where they can cause significant health problems. The California Occupational Health and Safety Administration (Cal OSHA) defines asbestos-containing materials as any material that contains 0.1 percent asbestos by weight.

Asbestos-containing materials may be present in older structures located throughout the City's Sphere of Influence, but particularly in the historic downtown. Asbestos may also be found in pipelines that may need to be relocated or replaced during the construction of a capital improvement.

Lead

Lead is a highly toxic metal that was used until the late 1970s in a number of products, most notably paint. Lead may cause a range of health effects, from behavioral problems and learning disabilities to seizures and death. Primary sources of lead exposure are deteriorating lead-based paint, lead-contaminated dust, and lead-contaminated soil. Lead is often found in the paint that was used in striping roadways.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are mixtures of man-made chemicals with similar chemical structures. PCBs were used in hundreds of industrial and commercial applications, including electrical, heat transfer, and hydraulic equipment; as plasticizers in paints, plastics, and rubber products; in pigments, dyes, and carbonless copy paper; and many other applications. More than 1.5 billion pounds of PCBs were manufactured in the United States prior to cessation of production in 1977.

PCBs may be presented in electrical transformers and other equipment located within the City's Sphere of Influence.



Mercury

Mercury is a naturally occurring element that is found in air, water, and soil that has traditionally been used to make products such as fluorescent lamps, switches, and thermometers. Mercury exposure can damage the brain, heart, kidneys, lungs, and immune system of people of all ages. High levels of mercury in the bloodstream of unborn babies and young children may harm the developing nervous system.

Mercury could be present in structures containing certain lighting fixtures, switches, and other devices and might present a human hazard should such structures be demolished or remodeled during the time horizon of the General Plan.

Wildfire

The foothill and mountainous watershed areas of western Solano County and grasslands located throughout the County are threatened with wildfire. The Benicia Hills, Potrero Hills, Cement Hills, and eastern English Hills are in areas of high fire risk.

Although grasslands on the edges of Suisun City's Sphere of Influence area may be prone to wildfire, grassland fires are not as potentially intensive as mountainous brush fires. Areas within the City's Sphere of Influence are characterized as moderate fire risk, for the most part. However, according to draft fire risk maps from the California Department of Forestry and Fire Protection (CALFIRE), there are areas of high fire risk in the western part of the Sphere of Influence and just east of Sunset Avenue and south of State Route 12 (see Exhibit HAZ-3).

Regulatory Setting

Federal, state, and local governments oversee regulations governing natural and human-caused hazards. These regulations include laws to protect human lives, buildings, and infrastructure, primarily through hazard mapping, land use limitations, and building codes. The City cooperates with Solano County for the provision of some services to protect people from hazards and to respond to emergencies.

Federal Plans, Policies, Regulations, and Laws

Federal laws regulate environmental hazards as they pertain to human health, safety, and livelihood as well as to minimize threats to the environment. The following federal agencies implement federal laws and regulations for public health and safety:

- The U.S. Environmental Protection Agency (EPA) regulates the use of hazardous materials and remediation of hazardous material sites.
- The U.S. Army Corps of Engineers (USACE) and Federal Emergency Management Agency (FEMA) provide technical data on flood prone areas and locations that could be inundated as a result of dam failure.

- The U.S. Geologic Survey (USGS) and FEMA provide technical data and expertise related to seismic hazards.
- The U.S. Forest Service (USFS) provides technical data on wildland fires and wildfire risk.
- The Federal Aviation Administration (FAA) regulates airports and aviation and the Federal Transportation Administration (FTA) regulates railroad.

Resource Conservation and Recovery Act

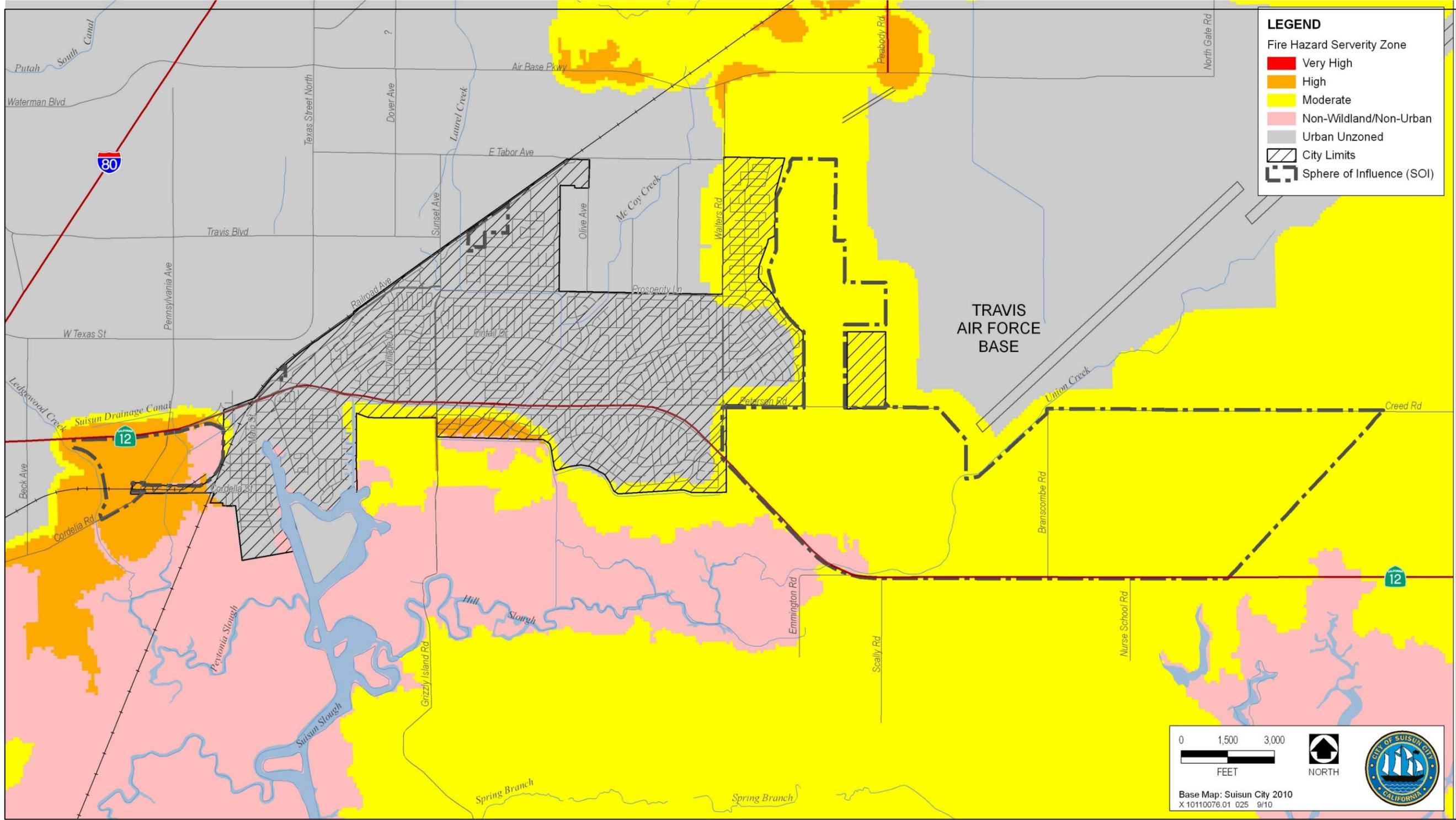
A regulatory program is administered by EPA through the Resource Conservation and Recovery Act (RCRA). RCRA covers hazardous materials at all facilities and sites in the country through their entire usage cycle, from manufacture through transportation, treatment, storage, and disposal. RCRA established an all-encompassing federal regulatory program for hazardous substances.

RCRA was amended by the Hazardous and Solid Waste Amendments of 1984, which specifically prohibits the use of certain techniques for the disposal of various hazardous substances. The Federal Emergency Planning and Community Right to Know Act of 1986 imposes hazardous-materials planning requirements to help protect local communities in the event of accidental release of hazardous substances. EPA has delegated many of the RCRA requirements to the California Department of Toxic Substances Control (DTSC).

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was enacted in 1980. The goals of CERCLA are to:

- establish prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- provide for liability of persons responsible for releases of hazardous waste at these sites; and
- establish a trust fund (commonly known as Superfund) to provide for cleanup when no responsible party can be identified.



Source: California Department of Forestry and Fire Protection 2007.

Exhibit HAZ-3

Fire Risk



The law authorizes two kinds of response actions:

- short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening. These actions can be conducted only at sites listed on EPA's National Priorities List (NPL), which are also known as Superfund Sites.

Federal Aviation Regulations Part 77

Federal Aviation Rule (FAR) Title 14, Part 77, establishes standards and notification requirements for objects affecting navigable airspace associated with construction on or near airports. Notification serves as the basis for:

- evaluating the effect of the construction or alteration on operating procedures;
- determining the potential hazardous effect of the proposed construction on air navigation;
- identifying mitigating measures to enhance safe air navigation; and
- charting of new objects.

Notification allows FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing the adverse impacts on the safe and efficient use of navigable airspace. Any person or organization who intends to sponsor any of the following construction or alterations must notify FAA:

- any construction or alteration exceeding 200 feet above ground level.
- any construction or alteration:
 - within 20,000 feet of a public-use or military airport that exceeds a 100:1 surface from any point on the runway of each airport, with at least one runway more than 3,200 feet;
 - within 10,000 feet of a public-use or military airport that exceeds a 50:1 surface from any point on the runway of each airport, with its longest runway no more than 3,200 feet; or
 - within 5,000 feet of a public-use heliport that exceeds a 25:1 surface.
- any highway, railroad, or other traverse way whose prescribed adjusted height would exceed the above-noted standards.
- when requested by FAA.
- any construction or alteration located on a public-use airport or heliport, regardless of height or location.

Wildlife Hazards on or Near Airports

The FAA, through Advisory Circular (AC) 150/5200-33b, Hazardous Wildlife Attractants on or Near Airports, provides direction for restricting land uses that may attract hazardous wildlife (primarily avian) at public-use airports. These attractants include

human-made or natural areas, including poorly drained sites, retention ponds, agricultural activities, and wetlands. The FAA recommends that a distance of 10,000 feet separate wildlife attractants and aircraft movement areas.

Military Installations

In 1989, Travis AFB was placed on the EPA National Priorities List as a Superfund project. For environmental cleanup purposes, four Operable Units (OUs) have been delineated. These OUs consist of landfills, disposal areas or spill sites, fire fighting training areas, tank storage areas, and groundwater contamination and potentially contaminated surface water bodies. The primary environmental contaminants found at Travis AFB include solvents, metals, and fuels.

Off-base migration of contaminants appears to be very limited, with minimal potential for harmful exposure. Institutional controls limit access to on-base source areas, operable units and abandoned structures, and have eliminated possible exposures to other sites of contamination and physical hazards within Travis AFB. However, if land uses change on the base, the likelihood of human exposure should be re-evaluated by the Air Force, the EPA, the State of California, or Agency for Toxic Substances and Disease Registry (ATSDR).

Additionally, the Planning and Zoning Law (California Government Code, sections 65352, 65940, and 65944) requires consultation with U.S. Armed Forces Personnel during General Plan updates that could affect ongoing military operations.

Under Senate Bill No. 1462, the City must notify the U.S. Air Force of proposed land use immediately adjacent to Travis AFB. The *Travis Air Force Base Land Use Compatibility Plan* encourages lands immediately adjacent to Travis AFB to be used housing Air Force Base personnel, equipment and buildings so that airport crash hazards are minimized and military security is enforced. Also a buffer zone around these immediately adjacent areas is established to restrict sensitive land uses such as schools, day care centers, senior centers and other facilities where occupants have reduced effective mobility and are unable to respond to emergency situations from the buffer zone (Shutt Moen Associates 2002).

State Plans, Policies, Regulations, and Laws

Proposition 65

Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. The Proposition was intended by its authors to protect California citizens and the State's drinking water sources from chemicals known to cause cancer, birth defects or other reproductive harm, and to inform citizens about exposures to such chemicals. Proposition 65 requires the Governor to publish, at least annually, a list of chemicals known to the state to cause cancer or reproductive toxicity.

Toxic Release Contingency Plan

The Toxic Release Contingency Plan (California Government Code Section 8574.16) requires that regional and local planning agencies incorporate within their planning the



State's effort to respond to emergency toxic releases, and ensure the effective and efficient use of regional and local resources in the areas of traffic and crowd control, firefighting, hazardous materials response and cleanup, radio and communications control, and provision of medical emergency services.

Hazardous Materials Release Response and Inventory Program

The Hazardous Materials Release Response and Inventory Program (California Health and Safety Code Sections 25500–25520) establishes business and area plans for the handling and release of hazardous materials. Basic information on the location, type, quantity, and the health risks of hazardous materials handled, used, stored, or disposed of in the state, which could be accidentally released into the environment, is tracked by the local Certified Unified Program Agency (CUPA) within each region for the use and awareness of hazardous materials responders, firefighters, emergency care providers, regulatory agencies and other interested persons.

Hazardous Substances Emergency Response Training

California Occupational Safety and Health Administration (CALOSHA) Hazardous Substances Emergency Response Training is required for all workers involved with the handling, disposal, or emergency response to hazardous materials (Title 8, Sec 5192). Various training levels are required depending on organizational level and responsibility level.

Regional and Local Plans, Policies, Regulations, and Ordinances

Solano County Department of Resource Management

The Solano County Department of Resource Management is the CUPA for all cities and unincorporated areas within the county. The CUPA oversees the following programs:

- Permitting and inspection of businesses that handle quantities of hazardous materials/waste greater than or equal to 55 gallons, 500 pounds, or 200 cubic feet of a compressed gas at any time. An estimated 1,200 businesses in Solano County are regulated by this program.
- In conjunction with the Hazardous Materials Business Plan Program, CUPA staff inspects businesses for compliance with the Hazardous Waste Control Act. In addition, the Division responds to complaints of illegal disposal of hazardous waste and inspects businesses that treat hazardous waste pursuant to permit by rule, conditional authorization, or conditional exemption.
- Hazardous Materials Management Plans addressing emergency response to incidents involving hazardous materials handled by a business over 55 gallons, 500 pounds, or 200 cubic feet of gas. These plans include an inventory of hazardous materials which is updated annually. Hazardous materials may be new or waste materials that are toxic, reactive, ignitable, or corrosive.

- Under the California Accidental Release Prevention program, regulated substances require extensive emergency planning. The most common regulated substances found in the county requiring a Risk Management Plan (RMP) are gaseous chlorine and anhydrous ammonia, but more than 400 other chemicals may require a RMP. Businesses that meet threshold quantities are required to provide their RMP to both the County's Environmental Health Service Division and the U.S EPA. Every three years the owner must certify compliance of their processes and practices and every five years the owner must update their RMP and confirm that their process hazard analysis remains current.
- The County also conducts the permitting and inspection of underground storage tanks (USTs) that store hazardous materials. There are an estimated 190 facilities throughout Solano County that are subject to the regulatory requirements of this program (Solano County 2010). All UST are subject to monitoring for leakage. All new tanks, tank modifications/repairs, and tank removals/closures are permitted by Environmental Health Service Division, Hazardous Materials Section. Under a contract with the State Water Resources Control Board, the Environmental Health Services Division conducts the Local Oversight Program, to oversee the abatement and cleanup of releases of hazardous substances from underground storage.
- All underground storage tanks (USTs) are subject to monitoring for leakage. Most tanks are double walled and are equipped with electronic systems to detect leaks. All tanks are permitted annually by the County Resource Management Department. All new tanks and tank repairs are permitted for installation by Resource Management. An estimated 227 sites located throughout the County are within the responsibility of this program (California Water Resources Control Board 2006).
- The County (as CUPA) is responsible for the implementation, enforcement and administration of the Aboveground Petroleum Storage Act from the State Water Resources Control Board. The County conducts inspections of all facilities that store petroleum products in containers of 55-gallons or greater, including above ground tanks, with a total aggregate quantity of at least 10,000 gallons.

Brownfields

Brownfields are properties that are contaminated, or thought to be contaminated, and are underutilized due to perceived remediation costs and liability concerns. When agricultural and green spaces are developed for residential, commercial, or industrial uses, this development requires the new construction of roads and sewers. When development skips over centrally located brownfields areas to developed land on the fringes of cities, this misses an opportunity to make more efficient use of existing infrastructure that is located within already developed areas.

Undeveloped properties on the east side of the City, both immediately adjacent to the north and south sides of Highway 12 and vacant properties in downtown near the City Marina are considered Brownfield opportunity sites. Exhibit Haz-2 shows the DTSC records for these properties. They are records for LUSTs and each has been remediated. The vacant property at the northwest corner is another Brownfield site that does not have any records of existing contamination (Exhibit Haz-2). The lot on south of East Tabor Avenue and east of Sunset Avenue presents an opportunity because not remediation is needed.

Land on the east side would not be considered Brownfield opportunities because no DTSC records have been filed. The eastern area would be considered Greenfield development opportunities because historically, this area has been used as rangeland. The fact that Travis AFB is a Superfund site is not a constraint for development,



because the plume of contaminants in the groundwater is flowing north from the base. The primary constraint for development in the east side of the City is potential conflicts with operations of Travis AFB as described above.

Solano County Department of Emergency Services

The Solano County Office of Emergency Services (OES) provides for the development, establishment, and maintenance of programs and procedures which assist in the protection of lives and property of residents from the effects of natural or human-caused disasters. Additionally, through Emergency Preparedness training and awareness presentations, OES informs citizens and organizations of appropriate actions to take before, during, and after a disaster or major emergency.

OES manages and coordinates disaster response, terrorism response, search and rescue missions, flood response, and other major emergencies. OES works with City and County departments on fire suppression activities, evacuations, hazardous materials incidents, disaster exercises, planning, and utilization of resources through the SEMS/Incident Command System. Additionally, OES conducts Emergency Preparedness training and awareness presentations for citizens and various organizations so they better understand what they should do before, during, and after a disaster or major emergency.

General Plan Issues & Opportunities

Some of the key issues to be answered through the General Plan update include:

- **Coordination with ongoing Local Hazard Mitigation Plan.** Concurrent with the General Plan Update, the City and Suisun Fire Protection District are in the process of drafting a LHMP. In particular, the LHMP will provide a prioritized list of strategies, programs, policies and actions to prevent and to respond emergencies including spills of hazardous and toxic materials. The LHMP will include a brief description of each recommendation, persons responsible for implementing recommendations, approximate cost of and potential funding sources for implementing recommendations, cost effectiveness of recommendations, and suggested timeline for implementing recommendations. The General Plan Update will identify environmental conditions related to hazardous materials and will establish policies that would guide City decisions related to land use and capital improvements. The City's General Plan policies will provide an outline of the City's approach to avoiding hazards that could affect the public or environmental health. While the City's General Plan policies will provide direction for avoiding hazards that could affect the public or environmental health, the LHMP will provide specific measures to implement these policies.
- **Brownfield redevelopment.** Petroleum-related industries, pipelines traversing the Suisun City area, and other existing and past uses have resulted in some challenges to redevelopment. As described in this background report, there are specific vacant properties in the west and southern parts of the City that are considered Brownfield opportunity sites because there hazardous materials issues have largely been addressed through DTSC and the California Water Resources Control Board. Should

the City proactively work with these local property owners and interested developers to investigate soils and groundwater pollution and identify resources to remediate sites or utilize already remediated sites for development consistent with the General Plan? Could the City provide incentives for Brownfield redevelopment, such as expedited CEQA review/processing? Should the General Plan include a strategy to identify external resources that can be used for infrastructure improvements, remediation, or other investments designed to encourage reuse of the Brownfield opportunity sites described herein?

- **Avoiding conflicts with Travis AFB.** As noted, limitations in the eastern part of the City are caused by potential conflicts with Travis AFB. While the fact the Travis AFB is a Superfund site is not particularly relevant to this area of the City, operations of the base are the key considerations. Noise exposure issues should be considered when determining any land use planning in this area. The creation of wildlife hazard attractants such as detention basins should also be avoided when considering storm water management in this area. With these public health and safety concerns in mind (both for City residents and for military personnel utilizing Travis AFB, should the City avoid land use change in the eastern portion of the Sphere of Influence or identify areas around the Base to be preserved permanently in open space?
- **Reduce the risk of upset of hazardous materials during construction of capital improvement projects.** The City has a good track record with respect to protecting people from exposure to hazardous and toxic materials during construction of its capital improvement projects. As the City grows and redevelops through the planning horizon of the General Plan Update, capital improvement projects may be warranted that could disturb contaminated soils or subsurface hazardous structures. Should the City consider policies to ensure the City's capital improvement projects require site investigation, disturbance minimization, and mitigation, as would be required for private development projects?

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H A Z A R D S & H A Z A R D O U S M A T E R I A L S
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