



February 2020



19500 Main Street Digital Billboards Project

Final Initial Study/
Mitigated Negative Declaration

Prepared for
City of Carson

Prepared by

Michael Baker
INTERNATIONAL

**FINAL
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

**19500 Main Street Digital
Billboards Project**

State Clearinghouse No. 2020019053

Lead Agency:



CITY OF CARSON
701 East Carson Street
Carson, California 90745
Contact: Ms. Manraj Bhatia, Assistant Planner
310.952.1761

Prepared by:

MICHAEL BAKER INTERNATIONAL
5 Hutton Centre Drive, Suite 500
Santa Ana, California 92707
Contact: Ms. Alicia Gonzalez
949.472.3505

February 2020

This document is designed for double-sided printing to conserve natural resources.



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1.0 INTRODUCTION

The 19500 Main Street Digital Billboards Project (project) would replace an existing traditional billboard with a double-sided digital sign structure and install of a new double-sided digital sign structure on a vacant lot located adjacent to northbound Interstate 405 (I-405) at 19500 Main Street, Carson, California. The project would require the discretionary approvals of a Development Agreement, Zone Text Amendment, and two Variances. The project would also require an Outdoor Advertising (ODA) Display Permit from the California Department of Transportation (Caltrans), a Dewatering Permit from Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB), and a Post Closure Land Use Plan Review from the Los Angeles County Department of Public Health (Public Health).

The Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse No. 2020019053) was made available for public review and comment pursuant to CEQA Guidelines Section 15073. The public review commenced on January 17, 2020 and concluded on February 17, 2020. The IS/MND and supporting attachments were available for review by the general public at:

- City of Carson Community Development Department – Planning Division, 701 East Carson Street, Carson, California 90745
- City of Carson website: <http://ci.carson.ca.us/CommunityDevelopment/Planning.aspx>
- City of Carson Public Library, 151 East Carson Street, Carson, California 90745



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2.0 RESPONSE TO COMMENTS

During the public review period, comment letters were received on the IS/MND from interested public agencies, organizations, and individuals. The following is a list of commenters on the IS/MND during the public review period.

Comment Letter No.	Person, Firm, or Agency	Letter Dated
1	State Clearinghouse and Planning Unit Governor's Office of Planning and Research Scott Morgan, Director	February 19, 2020
2	Los Angeles County Department of Public Health P. Christine Urbach, MPH REHS, Environmental Health Specialist III	January 30, 2020
3	California Department of Transportation District 7 Miya Edmonson, IGR/CEQA Branch Chief	February 3, 2020

Although the CEQA Guidelines do not require a lead agency to prepare written responses to comments received (see CEQA Guidelines Section 15088), the City of Carson has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed project. The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

February 19, 2020

Manraj Bhatia
Carson, City of
701 East Carson Street
Carson, CA 90745

Subject: 19500 Main Street Digital Billboards Project
SCH#: 2020019053

Dear Manraj Bhatia:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 2/18/2020, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

1-1

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2020019053/2>. Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly.**

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency



Response No. 1

State Clearinghouse and Planning Unit
Governor's Office of Planning and Research
Scott Morgan, Director
February 19, 2020

- 1-1 The commenter indicates that the State Clearinghouse submitted the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) to selected State agencies for review, and that the comment period for the Draft IS/MND concluded on February 18, 2020 for State agencies.¹ The comment indicates that the City of Carson complied with the review requirements for draft environmental documents pursuant to CEQA. This letter also refers to the State Clearinghouse CEQA database to retrieve State Agency Comments. One State Agency letter was retrieved from the State Clearinghouse CEQA database and is included herein as Comment Letter 3. The comment does not provide specific comments regarding information presented in the Draft IS/MND and no further response is necessary

¹ It is noted that the State Clearinghouse and Planning Unit incorrectly identified the project's close of public review as February 18, 2020. As noted in Section 1.0, Introduction, the project's public review period commenced on January 17, 2020 and concluded on February 17, 2020. The City of Carson did not receive additional comment letters on February 18, 2020.



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

MUNTU DAVIS, M.D., M.P.H.
Health Officer

LIZA FRIAS, REHS
Director of Environmental Health

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Kathryn Barger
Fifth District

January 30, 2020

Ms. Manraj Bhatia, Assistant Planner
City of Carson
701 E Carson St
Carson, CA 90745
mbhatia@carson.ca.us

Dear Ms. Bhatia,

RE: THE 19500 MAIN STREET DIGITAL BILLBOARDS PROJECT ON SOLID WASTE INFORMATION SYSTEM (SWIS) #19-AQ-0014 BKK DUMP – CARSON

The Los Angeles County Department of Public Health’s Solid Waste Management Program, acting as the Local Enforcement Agency (LEA) for the California Department of Resources Recycling and Recovery (CalRecycle), appreciates the opportunity to review the Initial Study – Mitigated Negative Declaration for the 19500 Main Street Digital Billboards Project.

The project consists of the installation of two double-sided digital sign structures. One would replace a current static sign and the other would be new construction. The project activities would include demolition, excavation, trenching, and construction. Construction activities would require approximately 40 cubic yards (20 cubic yards per sign) of soil and landfill materials to be exported from the project site. The landfill cover soil is stated to range from three to five feet thick with landfill material extending as deep as 22 feet below ground surface (bgs). The proposed project would have a maximum excavation depth of approximately 40 feet bgs and would therefore penetrate both the cover layer and the entire landfill layer into the groundwater (encountered on site at approximately 36 feet bgs), the native soils, or both.

The project is entirely within the boundary of the BKK Dump – Carson (SWIS# 19-AQ-0014) and is therefore subject to the State solid waste regulations that require compliance with all sections of Title 27 California Code of Regulations (CCR) Section 21190 and 27 CCR 21100. Please submit a

2-1

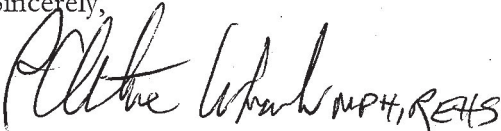
2-2

January 30, 2020
BKK Carson
Page 2

Post Closure Land Use Plan for approval by the LEA and CalRecycle prior to initiating any work. We look forward to working with you. Should you have any questions, please contact me at either (626) 430-5540 or curbach@ph.lacounty.gov.

↑
2-2

Sincerely,



P. Christine Urbach, MPH REHS
Environmental Health Specialist III
LEA, Permitting and Surveillance Section

Cc: Dorcas Hanson-Lugo, Chief – Permitting and Surveillance Section (LEA)
Rasaq Ayodele, Site Inspector (LEA)
Dawn Liang (CalRecycle)



Response No. 2

Los Angeles County Department of Public Health
P. Christine Urbach, MPH REHS, Environmental Health Specialist III
January 30, 2020

- 2-1 This comment provides a general introduction to the Los Angeles County Department of Public Health's (Public Health) Solid Waste Management Program's role as the Local Enforcement Agency (LEA) for the California Department of Resources Recycling and Recovery (CalRecycle). The Draft IS/MND has been revised to include the Los Angeles County Department of Public Health's role as a LEA for CalRecycle. This clarification has been made to page 2-10 of the Draft IS/MND and is reflected below and in Section 3.0, *Errata*, of the Final IS/MND.

Page 2-10, Section 2.6, Agreements, Permits, and Approvals

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The proposed project would require agreements, permits, and approvals from the City and other agencies prior to construction. These agreements, permits, and approvals are described below and may change as the project entitlement process proceeds.

City of Carson – Lead Agency

- California Environmental Quality Act Clearance;
- Development Agreement;
- Zone Text Amendment;
- ~~Conditional Use Permit~~; and
- Variance.

California Department of Transportation – Responsible Agency

- Outdoor Advertising (ODA) Display Permit.

California Department of Toxic Substances Control – Responsible Agency

- Geotechnical Investigation Review (refer to Section 4.9).

Los Angeles Regional Water Quality Control Board – Responsible Agency

- Dewatering Permit.

Los Angeles County Department of Public Health – Responsible Agency

- Post Closure Land Use Plan Review.

This change provides a minor update, correction, or clarification and does not represent "significant new information" as defined in CEQA Guidelines Section 15088.5.



- 2-2 The commenter states that the project is located within the boundaries of the BKK Dump (SWIS# 19-AQ-0014) and is therefore subject to the State solid waste regulations that require compliance with all sections of Title 27 California Code of Regulations (CCR) 21190 and 27 CCR 21100. The Draft IS/MND discloses that the project site was a former organic refuse landfill site (Ben K. Kazarian [BKK] Carson Dump) and is on the Cortese List pursuant to Government Code Section 65962.5; refer to Draft IS/MND Section 2.3, *Background and History*. Based on the Phase I Environmental Site Assessment (Phase I ESA) prepared for the project, the project site's former use as an organic refuse landfill site has resulted in contamination to the soil, soil gas, and groundwater; refer to Draft IS/MND Appendix B, *Phase I Environmental Site Assessment*. Proposed excavation activities could result in the disturbance of existing landfill materials and could expose construction workers to hazardous materials during site disturbance activities. Prior to any site disturbance activities, Mitigation Measure HAZ-1 would require preparation of a Geotechnical Investigation to confirm the presence/absence of landfill material and require appropriate measures regarding the removal, disposal, and appropriate backfill of clean soils, as necessary, per existing Federal and State laws and regulations. Further, Mitigation Measure HAZ-2 would require that the construction contractor is certified in the Occupational Safety and Health Administration's (OSHA's) 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training program for the purposes of handling potential contaminated media during construction. With implementation of Mitigation Measures HAZ-1 and HAZ-2, construction-related impacts associated with historical landfill operations would be reduced to less than significant levels. Nonetheless, as discussed above, the project would be required to comply with all existing Federal, State, and local laws and regulations, including compliance with all sections of Title 27 CCR 21190 and 27 CCR 21100. As such, the Applicant would be required to submit a Post Closure Land Use Plan for approval by the LEA and CalRecycle prior to initiating any work. Section 2.4, *Agreements, Permits, and Approvals*, of the Draft IS/MND has been revised to clarify the project would require approval of a Post Closure Land Use Plan by the Los Angeles County Department of Public Health and CalRecycle; refer to Response to Comment 2-1.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

February 3, 2020

Manraj Bhatia
City of Carson
701 East Carson Street
Carson, CA 90745

RE: 19500 Main Street Digital Billboards Project
– Mitigated Negative Declaration (MND)
SCH # 2020019053
GTS # 07-LA-2020-03133
Vic. LA-405/PM: 12.606

Dear Manraj Bhatia:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced MND. The proposed project would replace an existing single static/traditional sign structure with a double-sided digital sign structure, and install a new double-sided digital sign structure on a vacant lot located adjacent to northbound Interstate 405 (I-405). The project site was a former organic refuse landfill site and is listed pursuant to Government Resources Code Section 65962.5. The Lead Agency is the City of Carson under the California Environmental Quality Act (CEQA).

3-1

Per Caltrans' Office of Outdoor Advertising (ODA) records, there are currently no applications pending for signs adjacent to I-405 in Los Angeles County. However, there are currently six permits assigned to Clear Channel Outdoor for displays adjacent to northbound I-405 between Main Street and East Del Amo Boulevard. If the City of Carson or Clear Channel Outdoor alter the existing structures associated with these permits in any way, that would constitute a new placing per California Code of Regulations § 2270 and would require a new permit from ODA prior to placement. Also, per the current Classified Landscaped Freeway Segment list, the project site location is classified as Landscaped and per Business & Professions Code § 5440, and new displays would be prohibited. If the City of Carson or Clear Channel Outdoor have any specific questions or concerns about this project, please contact George Anzo, ODA Southern Area Manager, at (213) 897-4208 and reference GTS # 07-LA-2020-03133.

3-2

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse



Response No. 3

California Department of Transportation District 7
Miya Edmonson, IGR/CEQA Branch Chief
February 3, 2020

3-1 This comment provides a general summary of the proposed project. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. Therefore, no further response is warranted.

3-2 The commenter states that the project would require a new permit from the California Department of Transportation's (Caltrans) Office of Outdoor Advertising (ODA) if the project plans to alter any of Clear Channel Outdoor's six existing permits for displays adjacent to I-405 in Los Angeles County. As noted in Section 2.4, *Project Characteristics*, of the Draft IS/MND, the project would be subject to Caltrans approval of an ODA Display Permit, which would ensure the project meets several location and design features, including, but not limited to:

- The display must be located outside the right-of-way of any highway;
- There must be an existing business activity within 1,000 feet of proposed display location on either side of the highway;
- Location of property where display is to be placed must be zoned industrial or commercial;
- The display must be 500 feet from any other permitted display on the same side of any highway that is a freeway; and
- The maximum height for each advertising display area is, 25 feet in height and 60 feet in length, not to exceed an overall maximum of 1,200 square feet.

The commenter also states that the project is classified as a "Landscaped Freeway" based on Caltrans' current Classified Landscaped Freeway Segment List and new displays would be prohibited per Business Professions Code Section 5440. The City of Carson recognizes that the project site is classified as a "Landscaped Freeway" based on Caltrans' current Classified Freeway Segment List. However, Business and Professions Code Section 5400 states that "no advertising display may be placed or maintained on property *adjacent to a 1,000-foot or greater section of a freeway that has been landscaped with at least an average width of 20 feet of landscaping or that includes trees, on department-owned property at the same or elevated grade of the main-traveled way if the advertising display is designed to be viewed primarily by persons traveling on the main-traveled way of the landscaped freeway [emphasis added].*" As depicted on Draft IS/MND Exhibit 2-2, *Site Vicinity*, the project site is currently vacant land situated along I-405 and is surrounded on all sides by urbanized uses. No portion of the project site or I-405 adjacent to the project site has been landscaped in accordance with Business Professions Code Section 5400. The site contains minimal vegetation; however, low-lying grasses and shrubs are dispersed throughout); refer to Draft IS/MND Section 2.2, *Environmental Setting*. The proposed project would not be subject to Business Professions Code Section 5440 in this regard.



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3.0 ERRATA

Changes to the Draft Initial Study/Mitigated Negative Declaration (IS/MND) are noted below. A double-underline indicates additions to the text; ~~strikethrough~~ indicates deletions to the text. Changes have been analyzed and responded to in Section 2.0, *Response to Comments*, of this Final IS/MND. The changes to the Draft IS/MND do not affect the overall conclusions of the environmental document. Changes are listed by page and, where appropriate, by paragraph.

These errata address the technical comments on the Draft IS/MND, which circulated from January 17, 2020 through February 17, 2020. These clarifications and modifications are not considered to result in any new or substantially greater significant impacts as compared to those identified in the Draft IS/MND. All mitigation measure modifications, if any, have been reflected in Section 4.0, *Mitigation Monitoring and Reporting Program*, of this Final IS/MND.

The Errata noted below for Section 2.0, *Project Description*, of the Draft IS/MND are global Errata and apply to the entirety of the Draft IS/MND. These clarifications or modifications are based upon applicable updated information that was not available at the time of the Draft IS/MND publication. These Errata are not considered significant new information and would not result in new or substantially greater significant impacts as compared to those identified in the Draft IS/MND.

SECTION 3.0, PROJECT DESCRIPTION

Page 2-9, Section 2.4, Project Characteristics, Paragraph 4

~~CONDITIONAL USE PERMIT~~

~~Under Municipal Code Section 9131.12, Uses Permitted on Organic Refuse Landfill Sites, any use proposed on a property designated as ORL (Organic Refuse Landfill) can only be permitted through a Conditional Use Permit. Since this property is designated ORL Overlay, the proposed outdoor advertising signs require a Conditional Use Permit as part of the development application.~~

Page 2-10, Section 2.6, Agreements, Permits, and Approvals

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The proposed project would require agreements, permits, and approvals from the City and other agencies prior to construction. These agreements, permits, and approvals are described below and may change as the project entitlement process proceeds.

City of Carson – Lead Agency

- California Environmental Quality Act Clearance;
- Development Agreement;
- Zone Text Amendment;
- ~~Conditional Use Permit~~; and
- Variance.



California Department of Transportation – Responsible Agency

- Outdoor Advertising (ODA) Display Permit.

California Department of Toxic Substances Control – Responsible Agency

- Geotechnical Investigation Review (refer to Section 4.9).

Los Angeles Regional Water Quality Control Board – Responsible Agency

- Dewatering Permit.

Los Angeles County Department of Public Health – Responsible Agency

- Post Closure Land Use Plan Review.



4.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document that includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring plan. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring plan must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, Table 1, *Mitigation Monitoring and Reporting Checklist*, has been prepared for the 19500 Main Street Digital Billboards Project (the “project”). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable Conditions of Approval relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the City of Carson 19500 Main Street Digital Billboards Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist (Table 1). If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the Initial Study/Mitigated Negative Declaration, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
- Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.



- The City prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. Such changes could include reassignment of monitoring and reporting responsibilities, plan redesign to make any appropriate improvements, and/or modification, substitution or deletion of mitigation measures subject to conditions described in CEQA Guidelines Section 15162. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.



Table 1
Mitigation Monitoring and Reporting Checklist

Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
CULTURAL RESOURCES								
CUL-1	<u>Unanticipated Discovery of Cultural Resources.</u> If cultural resources are encountered during project construction, work in the immediate area shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation and Native American consultation may be warranted to mitigate any significant impacts. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage archaeological resources.	Contractor	During Project Construction	City of Carson Community Development Department/ Qualified Archaeologist	During Project Construction			
GEOLOGY AND SOILS								
GEO-1	If evidence of subsurface paleontological resources is found during construction, excavation and other construction activity in that area shall cease and the construction contractor shall contact the City of Carson Community Development Director. With direction from the Community Development Director, a paleontologist certified by the	Contractor	During Project Construction	City of Carson Community Development Director/ Certified Paleontologist	During Project Construction			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	County of Los Angeles shall evaluate the find prior to resuming grading in the immediate vicinity of the find. If warranted, the paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for the salvage and curation of identified resources.							
HAZARDS AND HAZARDOUS MATERIALS								
HAZ-1	Prior to ground disturbance activities, the project Applicant shall retain a qualified Geotechnical Specialist with Phase II/site characterization experience to provide a geotechnical investigation for the proposed foundations of the digital sign structures. The investigation shall determine the potential for the excavation activities to encounter landfill materials, include appropriate recommendations for removal and disposal, and include appropriate recommendations for backfill materials. The geotechnical investigation report shall be provided to the Department of Toxic Substances Control for review and comment, and to the City of Carson Engineer for approval prior to ground disturbance activities	Applicant/ Qualified Geotechnical Specialist	Prior to Ground Disturbing Activities	City of Carson Community Development Department/ City Engineer/ Department of Toxic Substances Control	Prior to Ground Disturbing Activities			
HAZ-2	During construction activities, the contractor shall employ engineering controls and best management practices (BMPs) to minimize human exposure to potential contaminants and potential negative effects from an accidental release to groundwater and soils. Contractor employees working on-site shall be certified in	Applicant/ Contractor	Prior to Ground Disturbing Activities/ During Project Construction	City of Carson Community Development Department/ City Engineer	Prior to Ground Disturbing Activities/ During Project Construction			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>Occupational Safety and Health Administration's (OSHA's) 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training program and shall implement any engineering controls and construction BMPs recommended by the Department of Toxic Substance Control (as part of Mitigation Measure HAZ-1). Any required engineering controls and construction BMPs shall be listed on the project plans and specifications, to be approved by the City of Carson Engineer. Examples may include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Contractor shall monitor the area around the construction site for fugitive vapor emissions with appropriate field screening instrumentation. • Contractor shall water/mist soil as it is being excavated and loaded onto trucks. • Contractor shall place any stockpiled soil in areas that are shielded from prevailing winds. • Contractor shall cover the bottom of excavated areas with sheeting when work is not being performed. 							



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