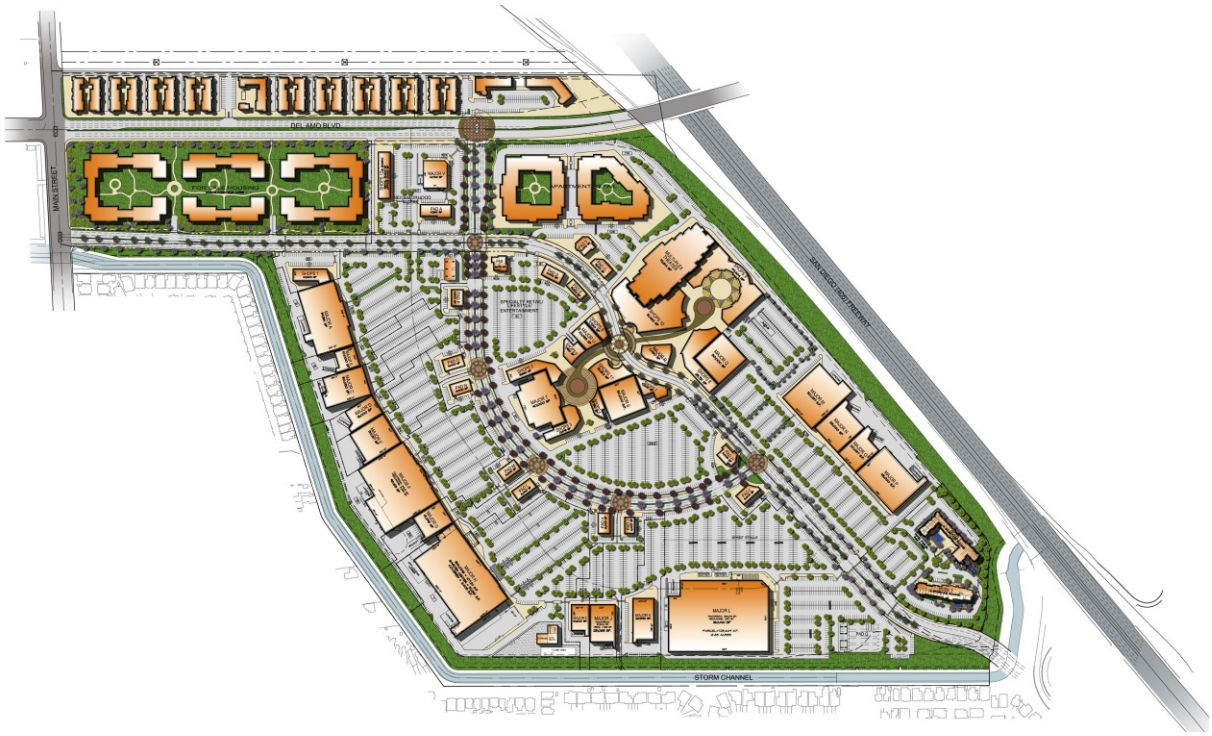
AVALON AT SOUTH BAY PROJECT

Emergency Response Plan

(Section 11 of Site Health and Safety Plan - Bound as a Separate Document)



For

Avalon at South Bay
(Formerly Carson Marketplace)
Carson, California

February 15, 2008

Prepared by:

TETRA TECH
348 W. Hospitality Lane, Suite 100
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Prepared for:

Carson Marketplace, LLC
4350 Von Karman Avenue, Suite 200
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Note: This Emergency Response Plan, although separately bound, is part (Section 11.0) of the overall Site Health and Safety Plan (SHSP) for the Avalon at South Bay (formerly Carson Marketplace) project. It is presented as a separate document with its own table of contents and attachments to facilitate ease of use in the event of a site emergency that would necessitate its implementation. An abbreviated version of the introduction and site history, and the figures from the SHSP have been repeated and included in this separately bound document to make it a stand-alone document.

EMERGENCY RESPONSE PLAN

FOR

AVALON AT SOUTH BAY
(FORMERLY CARSON MARKETPLACE)
20300 MAIN STREET
CARSON, CA

Prepared for:

Carson Marketplace, LLC
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ABBREVIATIONS AND ACRONYMS

Cal-EPA	California Environmental Protection Agency
Cal-OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CPR	cardiopulmonary resuscitation
CRWQCB	California Regional Water Quality Control Board
CSDLAC	County Sanitation District of Los Angeles County
DDC	deep dynamic compaction
DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
EOC	emergency operations center
EPA	Environmental Protection Agency
ERP	Emergency Response Plan
ERT	Emergency response team
EZ	exclusion zone
HAZWOPER	Hazardous Waste Operations and Emergency Response
HSO	Health and Safety Officer
IC	Incident Commander
ICS	Incident Command System
LAZ	limited access zone
LLDPE	Low linear density polyethylene
mHz	megahertz
MSDS	Material Safety Data Sheet
OCP	operational command post
OVA	organic vapor analyzer
PID	photoionization detector
PPE	personal protective equipment
RCRA	Resources Conservation and Recovery Act
RQ	reportable quantity
SHSP	Site Health and Safety Plan
TBD	to be determined
UCLA	University of California Los Angeles

SECTION 11.0 EMERGENCY RESPONSE PLAN

Carson Marketplace, LLC (Developer) has proposed to develop the Avalon at South Bay development project (Project), which was previously named Carson Marketplace. This proposed brownsfield restoration project involves the development of the former Cal Compact landfill into multiple land uses, including commercial, recreation, entertainment, big-box retail stores, restaurants, hotels, and residential. The proposed Project site comprises approximately 168 acres of land located at 20300 Main Street in Carson, California. The property is bounded on the east/northeast by the San Diego Freeway (I-405), on the north by Del Amo Boulevard, on the west by Main Street and single family residences and mobile home development, and on the south by single family residences and mobile home development (Figure 1-1). A strip of vacant land to the north across Del Amo Boulevard, which comprises 11 acres, is also within the overall scope of the Project. This portion of the property was not part of the former landfill and therefore, no environmental remediation activities are needed prior to the commencement of the development activities planned for it.

The former Cal Compact landfill consists of five separate landfill cells numbered A1 through A5 separated by the site boundaries on the outer perimeter and by two interior roadways on the interior perimeter (Lenardo Drive and Stamps Drive). A Los Angeles County Flood Control channel (Torrance Lateral) is located adjacent to the south and west sides of the Project site and serves to separate the Project site from the adjacent residential neighborhood (Figure 1-2).

This Project involves the development of the former Cal Compact landfill into the following land uses: neighborhood commercial, regional commercial, commercial recreation/entertainment, big-box retail stores, restaurants, hotels, and residential (Figure 1-3). The construction phases of this Project will begin with mass grading of the former landfill area and removal of some of the clean soil covering the landfill cells. This will be done to establish a uniform grade and minimize the thickness of clean soil cover overlying the refuse material so that compaction of the landfill cells may commence. Clean soil removed in the grading process will be temporarily stockpiled onsite until it is reused. Compaction of refuse will be done using deep dynamic compaction (DDC) to consolidate the refuse and soil below future parking and open areas to minimize future settling. The refuse under future building locations will not be compacted. Once all compaction is complete, a landfill gas collection system with horizontal collection wells throughout the site and vertical gas collection wells below future building locations will be installed. This gas collection system will be connected to a gas flare treatment system with a landfill operations center which will have controls and integral monitoring to detect any leakage or system failure. The landfill cells and gas collection system will then have a multi-component landfill cap installed. The first layer of this cap will be the installation of a continuous layer of linear low density polyethylene (LLDPE) geomembrane which will serve as the primary impermeable layer of the cap system. This LLDPE geomembrane will then have drainage strips installed on top of it that will direct water off of the landfill cap so that it does not accumulate. These drainage strips will be

covered by a geotextile fabric layer to prevent the accumulation of silt and eventual clogging of the drainage system. This layer will then be covered with clean soil.

All future buildings will be supported on driven piles. Piles will be driven through the refuse until competent native soil is reached. Pile caps will be installed and the concrete building slabs will be poured on top. The LLDPE geomembrane will be sealed to the pile caps where they penetrate it using an expansion boot to allow expansion and movement while remaining sealed.

A building protection system will be installed below all building locations to serve as a backup in case of landfill cap or primary gas collection system failure. This system will include the installation of a membrane attached to the underside of the concrete slab. The space between this membrane and the LLDPE geomembrane will have a passive gas venting system installed and will also include methane detection sensors to provide notification of system failure. All buildings will be built aboveground.

The Project will also include the installation of a groundwater extraction and treatment system along the southern boundary of the Project site to contain and treat impacted groundwater underlying the Project. Some refuse materials in the landfill cells may need to be excavated and moved to facilitate the installation of site utilities and the landfill gas collection system. Tetra Tech, Incorporated (Tetra Tech) is the environmental engineer and general contractor responsible for the design and installation of these remedial systems. Tetra Tech is not, however, responsible for the design and installation of the driven piles, pile caps, and building slabs that make up the building foundations.

Tetra Tech is responsible for activities on-site and implements the Emergency Response Plan (ERP) as required. The address for Tetra Tech at the site is 20400 Main Street, Carson, California 90745. The phone number for Tetra Tech at the site is (TBD)

11.1 Purpose and Scope of Plan

When an emergency occurs, this Plan is used to minimize the hazards to people, environment, or property. An emergency is any site condition that poses a greater than normal threat to people, the community, the environment, or property. All personnel, including emergency response team (ERT) and their subcontractors, implement these procedures. This Plan is written in compliance with federal, state and local regulations to include Title 22 Division 4.5 Chapter 14 Article 4 of the California Code of Regulations (CCR) - Contingency Plans and Emergency Response Procedures and Title 8 CCR Section 5192 - Hazardous Waste Operations and Emergency Response (HAZWOPER). The section on response to spills from fuel storage meets the requirements of the EPA Oil Pollution and Prevention regulations (40 CFR Part 112).

11.2 Plan Maintenance and Distribution

All personnel and their subcontractors will review a copy of the ERP prior to starting activities at the site. The Health and Safety Officer (HSO) will send copies of the ERP

and any subsequent revisions via certified mail (or other confirming delivery service) to the following:

- Emergency Response Team members;
- Los Angeles County Harbor-UCLA Medical Center;
- Fire and Police Departments of Carson;
- County of Los Angeles Fire Department, Public Works Department, and Department of Health;
- County Sanitation District of Los Angeles County (CSDLAC);
- California Regional Water Quality Control Board (CRWQCB);
- California Department of Transportation (Caltrans);
- California Office of Emergency Services, Sacramento; and
- California Environmental Protection Agency (Cal-EPA).

An "Acknowledgment of Receipt" form will accompany each distributed copy or revision along with a request that the form be completed and returned in an enclosed stamped and addressed envelope. See Appendix A for a representative form.

The HSO will maintain on-site a copy of the ERP, "Acknowledgment of Receipt" forms, and certified mail receipts. The Project Manager or his designee will review and revise this plan whenever the ERP fails in an emergency and whenever there are any substantial changes to personnel assignments, facility design, systems, or equipment. The ERP will be modified when required by regulatory changes.

11.3 Site Control

The main gate, staffed by security personnel, is the main access to the site. Visitors register and obtain a badge. All visitors require escort by personnel assigned to the site. Site personnel, upon arrival, obtain their badges from site security at the main gate. Security maintains records of all personnel entering or leaving the site. This record facilitates accounting for all personnel on the site during an emergency. The site has three designated zones to control access as follows:

> Support Zone—The Support Zone includes the main entrance and security gate area; the site office area; and the site materials, equipment, and tools storage areas.
>
> Limited Access Zone—The Limited Access Zone (LAZ) is any area not classified as a Support Zone or an Exclusion Zone (EZ). Only individuals who meet the requirements of 8 CCR 5192 for training and medical clearance can enter into LAZ areas because of a potential for exposure to toxic substances.

Exclusion Zone—An exclusion zone designates an area of special concern due to known contamination or potential contamination. An EZ on this site is any area where there is intrusion into the refuse within the landfill.

11.4 Communications

Telephones are located at the site office. The site will use a two-way radio system for internal communications. Base stations are at the offices and the security gate. Supervisors, technical, and safety personnel will have portable radios checked out to them on a daily basis utilizing a frequency is TBD mHz. Additionally, the frequency of TBD mHz is to be used for "line of sight" communications between field personnel working on specific tasks, as needed.

Depending on the magnitude of an incident, the Incident Commander (IC) or designee will immediately notify the emergency response team using site radios or telephones. As appropriate, the IC will notify local emergency response agencies such as the fire department or the police. Each incident has specific reporting requirements described later in this Plan. During an emergency, radios on the site are to be used only for essential communications.

The site will use the following emergency radio protocol:

- **"Code Red**" - A life threatening incident has occurred. Unless specifically asked to provide help, such as the emergency response team, stay off the radio and listen for notification to evacuate or to provide help. Do not go to the incident area unless requested.
- "**Code Yellow**" - An incident that is not life threatening has occurred. Stay off the radio and listen for notification to provide help. Do not go to the incident area unless requested.
- "**Evacuate**" - An emergency situation that requires immediate site evacuation and notification of emergency support agencies ("911"). Listen to radio for evacuation directions to a specific evacuation assembly area.
- "**911/Team Alert**" - Any emergency situation that requires notification of "911", and a response from the Emergency Response Team. The IC will direct the ERT to a specific site location.
- "**Team Alert**" - An emergency that requires a response from the ERT only. The IC will direct the ERT to a specific site location.
- "**All Clear" -** The situation is under control. Resume normal radio protocol.

In the event of an emergency, on-site communication between emergency response agencies and the ERT will not occur by radio or telephone because these agencies may not have the same radio frequencies and telephone communication between the agencies and the IC may be difficult. Therefore, the IC will coordinate communications with the emergency response agency (police or fire) who will assume overall direction for the

emergency. The IC will coordinate activities through the Emergency Operations Center or the Operations Command Post. The IC may use radios or telephones to contact personnel as directed by the emergency response agency commander.

11.5 Emergency Equipment and Supplies

The site has limited fire fighting equipment consisting of fire extinguishers and water trucks, spill control equipment and supplies, emergency deluge shower, eyewashes, and first aid kits. Site construction equipment may be used in some types of emergencies as described later in this Plan. There are supplies of personal protective equipment to include protective clothing, gloves, boots, and respirators. The HSO or designee ensures that all equipment and supplies are readily available, maintained, and inspected monthly. These supplies are stored in the site office support area.

11.5.1 Fire Fighting Equipment

There are various types of portable fire extinguishers located throughout the site and in all vehicles. Water trucks on-site, normally used for dust suppression, can supply water for fire fighting. Other construction equipment on-site such as backhoes and bull dozers can be used to assist during a fire emergency. For example, a backhoe or dozer can be used to construct fire breaks.

11.5.2 Spill Control and Containment

Spills of fuel, oil, hazardous substances, and contaminated debris or soil require immediate containment and cleanup. At the office support area, there are spill containment and control equipment consisting of 55-gallon drums, various absorbents, and assorted shovels and scoops. In addition, the on-site heavy equipment may be used to construct earthen berms to contain major spills.

11.5.3 Emergency Showers, Eyewashes, and First Aid Kits

An emergency deluge shower is located at the office support area. Portable eyewash stations (16-gallon, 0.4 gallon per minute), first aid kits, and blood borne pathogen kits are located in each work area. All site vehicles are equipped with first aid kits that meet OSHA requirements.

11.5.4 Personal Protective Equipment

The site has supplies of various items of personal protective equipment (PPE) available from the HSO or supervisors at the site office support area. Coveralls made of multi-layer laminated material (e.g. CPF-3), Saranex®-laminated Tyvek®, or polyethylene-coated Tyvek® are available. For hand protection, there are various chemical protective gloves made of nitrile, latex, natural rubber, or neoprene. All workers are required to wear steel toe boots. Disposable booties are available for chemical protection. ANSI-approved

safety glasses and goggles are available for eye protection. All personnel wear hard hats unless in the SZ. Personnel can attach a face shield to their hard hat if needed.

11.6 Emergency Response Team

The site has an emergency response team. The organization of this team is similar to the Incident Command System (ICS), a standard emergency management structure used by public emergency response agencies. In an emergency, one individual acts as the Incident Commander (IC). The IC determines the initial resources needed to handle the emergency. The following sections describe the emergency response organization structure and the specific responsibilities of each response team member. Table 11-1 lists the names and phone numbers of personnel assigned to these positions. As names or numbers change, the HSO will update this table.

11.6.1 Incident Commander or Alternate

The IC or the Alternate IC is at the facility during operating hours. After operating hours, one person is on call for any event that occurs during non-operational hours. Monthly, the IC will provide an on-call list to site security. Site security will contact the IC or alternate immediately when there is an emergency. The IC will take charge and determine, direct and delegate site personnel and resources to manage the emergency.

Key responsibilities of the IC include the following:

- Establish the Emergency Operations Center (EOC);
- Initiate evacuation, if needed;
- Initiate emergency response agency notification;
- Manage emergency response personnel; and
- Interface and coordinate with outside agencies responding to on-site emergencies.

11.6.2 Other Team Members

The emergency response team also includes the following members. These additional members and their key responsibilities are as follows:

Health and Safety Officer

- Advise IC regarding health and safety issues;
- Coordinate medical services;
- Monitor incident site to assure safety of personnel; and
- Brief personnel on incident hazards.

Public Relations Officer

- Notify the client and Tetra Tech Corporate Managers;
- Manage media until client assumes function;
- Issue facts of incident status; and
- Provide public information support to client.

Field Operations Chief

- Manage incident site safety, staging, and evacuation/mitigation personnel;
- Coordinate with the IC and provide field operations feedback to the IC;
- Manage deployment of personnel and equipment in the staging area; and
- Log location of each deployment.

Evacuation Lead

- Implement evacuation plan, if needed;
- Delineate the emergency area(s);
- Assist emergency response agencies, if requested; and
- Assist with decontamination of evacuated personnel, if needed.

Mitigation Lead

- Carry out mitigation measures directed by Field Operations Chief; and
- Assemble personnel and equipment needed for mitigation of the emergency

Technical/Environmental Lead

- Predict potential technical or environmental problems;
- Quantify effect of potential problems; and
- Assemble technical documents, drawings, plans, and other material that may be necessary to respond to the emergency.

Communication/ Documentation Lead

- Coordinate radio and telephone calls for emergency response;
- Maintain log of non-agency personnel involved in the emergency activities;
- Document location and type of incident that occurred; and

- Document chronology of incident including when emergency response agencies are notified and what is communicated.

Security

- Assure alternative entry points are monitored and secure;
- Maintain security in the event of fence failure or other unusual access/security event;
- Notify IC when response personnel arrive at site; and
- Maintain log of persons entering or leaving site.

11.7 Training

All permanent and temporary personnel will receive ERP training at an initial orientation. ERP training will also be provided as appropriate during weekly safety meetings and tailgate meetings. This training will include:

- How to Respond to an Emergency;
- Location of Emergency Equipment and Supplies; and
- Evacuation Procedures, Assembly Areas, and Routes.

In addition, Emergency Response Team members will receive training related to the following:

- Their duties and responsibilities;
- The command and control system (ICS); and
- Coordination procedures with emergency response agencies, health departments, and medical facilities.

The HSO will prepare instruction, evaluate the training program, and maintain documentation of the training. The HSO or designee will conduct training in a classroom setting and on-the-job ("in the field"). All site personnel will receive annual ERP refresher training.

The HSO, or designee, will arrange periodic meetings and/or training exercises. The HSO will plan at least one training exercise per year. If an emergency occurs this may be substituted for the training exercise. The HSO will invite emergency response team personnel, public emergency response agencies, and the Department of Toxic Substances Control (DTSC) to participate in this exercise and other training which is appropriate for their potential involvement in on-site emergencies. A post-training critique will be held to discuss and assess the effectiveness of the exercise in implementing the ERP. The DTSC will be notified in advance of these activities to facilitate their participation. If the activity is a training session, the notification will include an exercise scenario summary

stating the general training objectives, anticipated attendees, and any field activities in connection with the training.

11.8 Activation of the Emergency Response Plan

An IC is available at all times. The IC serves in the role of an emergency coordinator as required under RCRA generator regulations. The IC activates the emergency response plan based upon information provided by site personnel. The IC implements the ERP when people, the environment, or property are threatened, or when events occur that require enhanced management support including support from emergency services and other government agencies. The IC will activate the Emergency Response Team for the following:

- Fires that cannot be controlled by immediate use of fire extinguishers, or that cause release of toxic fumes, or where the use of water or chemical suppressants results in contaminated run-off;
- Explosions;
- Spills/ releases of flammable liquids or vapors that may cause a fire or explosive hazard, toxic liquids or vapors to the environment, a reportable quantity (RQ) of a hazardous substance, or all spills that cannot be contained on site;
- Landfill slope failure;
- Vehicles, equipment or materials that impede the flow of traffic on the San Diego Freeway or encroach upon the nearby residences;
- Injury to any person that requires more than first aid treatment;
- Earthquake;
- Weather such as high winds, rain, or lightning that may damage landfill management systems; and
- Public Disturbances.

11.9 General Emergency Response Activities

The following are procedures that are common to all emergency response activities:

- **Notification—**The person discovering the incident immediately reports the incident to the IC or, after hours, to site security, who will notify the IC. The IC notifies the ERT, as required, and notifies the site, as necessary, by alerting all personnel on the site. The IC will ensure that responding agencies (fire, police or medical (911)) or regulatory agencies are notified.
- **Establish Command System—**The IC will direct ERT members to perform duties, as required by the nature of the emergency. The IC determines the level of personnel mobilization. The IC considers the ability to notify personnel for incidents occurring after normal operating hours in determining possible level of

response. The IC will assure that communications systems are functioning. The IC will direct the activation of the Emergency Operations Center (EOC) at the site office. The EOC maintains central coordination and control over strategic planning and direction of emergency response resources. If needed, the IC will establish an Operational Command Post (OCP) at a safe field location. The OCP establishes a location nearer the incident to execute tactical operations in response to directions from the EOC. The local fire department's first responding IC will assume the role of the overall IC for the emergency. The Tetra Tech IC will provide support and coordinate functions for the responding agency IC.

- **Assess the Nature and Extent of Incident—**The IC determines the nature and extent of the incident. Each incident has specific factors requiring action which mitigate the incident. This plan discusses several types of anticipated incidents.
- **Identify Immediate Response Activities—**The IC ensures that immediate response activities are initiated. The IC determines if partial or total evacuation is necessary. The IC ensures that any activity which impacts the nearby community is coordinated with regulatory agencies. The IC will determine the need for shutdown of any site activity, facility, or system.
- **Coordinate Activities—**The IC coordinates all site activities. The IC ensures the use of appropriate technical procedures such as air monitoring, control and containment, or engineering to mitigate the incident and to minimize effects to people, the environment, or to property.
- **Maintain Site Security—**The IC ensures that the site security personnel maintain control of all personnel entering and leaving the site during an emergency. The IC may direct other employees to augment site security.
- **Follow-up Activities—**The IC ensures that all required notifications, especially to regulatory agencies are made. The IC ensures the preparation of documentation and other reports regarding the incident are completed. The IC conducts a post incident review to ensure completion of all requirements, to evaluate the incident, to plan and prevent future reoccurrence, and to ensure appropriate start-up procedures.

11.10 Shut Down (Operations, Facilities, Systems)

The IC may direct shutdown of site operations, facilities, or systems. If a site operation, facility, or system is shut down, the IC will assess the need for monitoring the affected areas and equipment. The monitoring will check for imminent hazards such as release, gas generation, pressure buildup, presence of incompatible waste, proper equipment, and utilities shut off.

11.11 Evacuation

In the event an incident poses an imminent threat to personnel, the IC will direct an evacuation of the facility or portions of the facility affected by the incident. Figure 11-1 shows the evacuation routes and assembly area. The Evacuation Lead supervises all

evacuation efforts until emergency response agencies assume control. The Project Manager and/or his designee will account for their personnel and direct them to specified assembly areas and direct subcontractors, suppliers, and visitors to specified assembly areas. This site has a pre-designated assembly area at the front gate. The pre-planned evacuation routes may change to respond to incident specific factors such as location of the incident, road closures, construction, wind direction, etc. All personnel except those participating in emergency response activities will remain in an assembly area until directed by the IC. To account for personnel at an assembly area, the site security guard or Site Manager designee will provide a copy of the site access log to each supervisor. The IC or designee will verify the accounting of all personnel listed.

11.12 Injuries

11.12.1 Minor Injuries

First aid trained individuals may treat minor injuries. The HSO will post a list of all personnel current in First Aid/CPR qualifications. The HSO will update this list monthly. All members of the ERT are to be current in First Aid/CPR qualifications. The HSO may direct personnel with minor injuries requiring further medical attention to the U.S. Health Works facility located at 19401 S. Vermont Dr., Suite L, Torrance, CA 90502 [Phone number (310) 324 5771] for treatment. In most cases, the site will provide a driver to transport the injured employee, unless the HSO determines that it is not necessary. Figure 11-2 shows the route to the clinic.

11.12.2 Major Injuries

All injuries to the back, all injuries to the head that cause dizziness or loss of consciousness, anything that causes an employee to lose consciousness, anything that affects the breathing, and any condition that cannot be treated or controlled by first aid is to be considered a major injury. Personnel qualified in First Aid/CPR may provide immediate support to the injured employee. Response to a major injury requires the following:

1. Call Security Guard by radio. Security Guard will call 911 and notify IC.
2. IC will notify ERT.
3. CPR/First Aid qualified personnel provides treatment, or stabilizes the injured person, until emergency response agency arrives.
   - If employee is in an unsafe area, move the employee to a safer area if it is possible to do so without exacerbating the injury.
   - Decontaminate the employee, if necessary and only if it will not injure the employee.
4. ERT member will escort outside medical or emergency agency personnel insuring that area is safe to enter.
5. Non-essential personnel will leave the area.
6. At the request of emergency agency personnel, assist with injured or contaminated personnel.

7. If injured employee is contaminated:
   - Notify responding emergency agency personnel of the nature and extent of the contamination so they may take appropriate action to protect themselves;
   - Ensure that personnel are wearing appropriate PPE and have necessary training;
   - Remove contaminated clothing from injured person, if possible;
   - Decontamination or removal of PPE is secondary to medical care. Medical personnel may choose to wrap the injured person in plastic or other clean protective material to protect emergency personnel and equipment while injured person is transported to emergency room;
   - Emergency response agency personnel will notify hospital/emergency room of the presence and nature of contaminated clothing and/or person. The HSO sends a MSDS or other type of chemical information sheet with the medical personnel. MSDSs are located at the Health and Safety office; and
   - If employee can walk or be moved without further injury, wash all affected skin areas thoroughly with soapy water.
8. Emergency agency personnel choose the medical facility to which the injured person is transported. Los Angeles County Harbor-UCLA Medical Center, 1000 W. Carson St., Torrance, CA 90502 (Phone (310) 222-2345), the closest medical facility, may be the selected facility and is aware of the types of hazards that landfill employees may encounter. Figure 11-3 shows the route to the hospital.

Recovery

The HSO or designee will call the Site Manager and provide the name of the injured person(s). The HSO will ensure that Cal-OSHA is immediately notified if there is a death or serious injury to employees. The HSO will initiate an incident investigation and ensure that the area is safe for work, that all equipment is safe to use, and review all work procedures regarding the incident. In the event of a death, the scene is to be left undisturbed, until police and/or Cal-OSHA investigate.

11.13 Spills and Releases

The site is expected to have methane gas emissions resulting from landfill refuse. Additionally, other potential volatile gases could be emitted from the landfill. Vehicles, storage tanks, bulk materials containers containing fuels, other petroleum products and oil, or other hazardous materials will be present on the site. When any of these materials spill or are no longer contained due to an accident, equipment failure, or container failure, the release of this material requires immediate internal notification. Any person discovering a release will immediately contact the HSO and the IC. The person will describe the source, the location, and the approximate quantity of the release. If possible, the person discovering the release will attempt to limit the extent of the release by constructing a temporary berm, by turning off a valve or a pump, or by plugging a hole. However, personnel must ensure they are wearing proper PPE and that they are not

taking any risk regarding their safety. If a spill or release occurs, the actions described in the following sections are taken:

11.13.1 IC Responsibilities

For spills and releases the IC will:

- Assess the nature and extent of the spill including the direction the release is heading, the potential for fires or explosions, the hazards and toxicity of the release and whether it poses a threat to people or the environment on or off the facility;
- Activate the ERT and the EOC, as necessary;
- Determine need to notify regulatory agencies;
- Direct the Field Operations Chief to:
  - Isolate the affected area to prevent unnecessary exposure and contamination of people or equipment;
  - Evacuate all nonessential personnel and equipment from the vicinity of the release;
  - Stop the release, if possible;
  - Provide equipment, supplies and personnel to cleanup the release; and
  - Ensure all cleanup materials are placed into approved containers and that containers are stored at the decontamination pad or top deck lay down area until disposal is arranged; and
- Follow-up with necessary notifications and reports.

11.13.2 Off-site Agency Response to Spills

If a spill is off site or enters the municipal storm water system, public response agencies will determine response actions at the time of the event. They will consider factors such as volume and type of spill, volume and types of other liquids in the drainage system, and anticipated receptors of the mixed spill and storm water liquid. Public response agencies have various resources they may use to respond to a release. The lead response agency which takes over as IC may identify, obtain, and allocate these resources. For example, the fire department may have additional absorbent material, or they may be able to use foam to control vapors or fumes.

11.13.4 Releases from Storage Tanks

The site may have storage tanks or other large containers for fuels and other bulk materials. If a tank or large container ruptures or leaks, the Project Manager or his designee will:

- Isolate the tank/container and remove it from service immediately;
- Pump and transfer all the liquid from the affected tank/container to other storage tanks/containers with available capacity and which are the same liquid. Collect any liquids inside concrete dikes or berms;
- Use dozers or backhoes to contain leaks by trenching or building berms to redirect the flow; and
- After draining a tank/container, make arrangements for repair and return to service or obtain a replacement.

11.13.6 Releases from Lines in Equipment

If equipment lines, such as hydraulic lines, fuel lines, fuel tanks, brake lines, water lines, oil lines, or oil containing elements break or leak, the Project Manager or his designee will:

- Contain liquids on-site using dikes, berms or sand bags; and
- Control the spill, pump standing liquid, or recover /absorb spilled materials with spill control supplies.

11.13.6 Recovery for Spills and Releases

Once the emergency situation is resolved, the IC will direct the HSO or designee to collect and properly contain any material that may have been released to the environment. The IC will ensure that waste is stored and disposed per the Site Operations Plan. The IC will notify the DTSC regarding cleanup actions and the completion of decontamination procedures, if required. Releases and spills may require specific reporting to various regulatory agencies. See Section 11.20 for reporting procedures.

11.14 Fire/Explosion

The person discovering a fire or witnessing an explosion will immediately notify security or designee guard and then the IC. The security guard will immediately call “911” based on the report. Site personnel will report all fires, no matter the size. The person making the initial report will describe the location and the type of fire.

11.14.1 Site Personnel Response to Fire/Explosion

Site personnel will immediately leave the area of an explosion. Site personnel will attempt to extinguish only incipient stage fires. Incipient stage fires are those type of fires which can easily be extinguished by fire extinguishers, water trucks, or dirt placed over the fire using heavy equipment. Personnel will not attempt to extinguish fires beyond the incipient stage. Personnel will leave the area of the fire and report to an area specified by the IC. The IC will immediately investigate all incipient stage fires that have been extinguished by site personnel.

11.14.2 IC Response to Fire/Explosion

For all fires beyond the incipient stage and for all explosions, the IC will:

- Activate the ERT and establish the EOC;
- Notify the Project Manager;
- Obtain wind and weather information;
- Ask for head count of all personnel;
- Determine need for full or partial evacuation;
- Determine if there is a health threat due to release of toxic vapors, gases, or liquids;
- Inform public agencies to arrange evacuation of nearby neighborhoods, if necessary;
- Ensure than an escort person meets the fire department at the main gate or other access point; and
- Direct the Field Operations Chief to:
  - Shut down all process, mechanical and electrical equipment, stop liquid and gas flow in areas where the fire or explosion occurred;
  - Remove all flammable and ignitable materials from the fire area, as practical;
  - Remove all mobile equipment from the area, if it can be done safely;
  - Assist the responding fire department as needed;
  - Provide equipment and supplies to the fire department as needed; and
  - Assist the fire department in follow-up investigations.

11.14.3 Fire Watch

The IC may determine that conditions, i.e., a potential re-igniting of an extinguished fire or the potential of a fire due to customary 4th of July celebrating, may require a fire watch.

11.14.4 Heavy Equipment

Operators can use earthmoving equipment to immediately extinguish incipient stage fires. In the case of underground fires, operators may use the equipment to fill cracks in the soil cover to suffocate the fire. However, operators must receive direction from the IC or the fire department to use earthmoving equipment for any fire beyond the incipient stage. Operators of water trucks may use the water from the vehicles to extinguish incipient

stage grass fires. They may also use the water trucks at the direction of the IC or the fire department.

Recovery

After the completion of investigations, the IC will ensure that notifications are made to the appropriate agencies. Before resuming operations the IC will coordinate repairs to damaged property and take measures to prevent reoccurrence. The HSO will ensure that fire suppression equipment such as fire extinguishers are replaced or returned to working order prior to restart of work.

11.15 Slope Failure

Although the slope of the landfill perimeter is not that steep, any failure of the slope where there is potential run-off into the nearby neighborhoods or the freeway and roads is an emergency if there are on-site injuries or there is impact to the site perimeter. The person discovering slope failure will report it immediately to the IC. The IC will:

- Contact "911" if injuries are suspected or if failure impacts areas off the property (surrounding neighborhoods or the San Diego Freeway);
- Direct inspection of work records to determine if there were workers in the area at the time of slope failure. If there were, the IC will initiate accounting for or searching for these workers;
- Activate ERT and instruct Field Operations Chief to conduct a field inspection to assess slope damage, to check for cracks above and around the failed area and to evaluate if progressive failure is possible;
- Determine if there was or is a hazardous material release. If so, implement procedures in Section 11.13;
- Direct construction of a temporary cover to seal off the area from infiltration and control landfill gas and odors;
- Restrict access to the area by use of barricades or berms until a geotechnical engineer can assess the failure; and
- Ensure the collection, containment, and storage of any hazardous materials per the site waste management plan.

Recovery

A qualified geotechnical engineer will assess slope failure and report the findings. The IC reports findings to regulatory agencies and undertakes measures either to repair damage or to perform other tasks that meet regulatory agency requirements. Site personnel collect, contain, store, and transport hazardous material that may have been released. The IC assists authorities in any situation where failure of slope affects neighboring properties or any nearby public roads.

11.16 Earthquake

The site is located in Southern California, which is an active earthquake zone. It is possible that an earthquake may occur at the site while the project is progressing. The magnitude and location of the epicenter of the earthquake will guide the determination of any response or mitigation measures needed after the earthquake occurs.

11.16.1 Personnel Response to Earthquake

If an earthquake occurs, personnel will:

- Remain calm. Personnel will take cover under a desk or heavy table. Stay clear of glass and falling debris. Stay away from bookcases, cabinets and files;
- If outside, get into an open area away from buildings, structures, power lines, etc.; and
- If in a vehicle, pull to side of road and stop, stay away from structure, power line, fences, and other objects. Stay in vehicle and listen to either vehicle radio or portable radio for information.

11.16.2 IC Response to Earthquake

If an earthquake occurs, the IC will activate the ERT. After hours, the security guard will notify the IC. The IC will:

- Initiate site evacuation, if necessary;
- Initiate field inspections for slope damage and damage to systems. Instruct ERT members operating under the "Buddy System " to inspect critical landfill facilities using a PID, OVA, Level C PPE and radios;
- Ensure that damaged systems are shut down to prevent further damage or to facilitate repairs. The IC will consider shut down of any landfill gas treatment system (once installed) or any other installed components of the gas collection system;
- Notify appropriate agencies depending on types of incidents (fire, injury, etc.); and
- Ensure site security.

11.16.3 Inspection Team

The inspection team will:

- Shut down systems as needed during the inspection to assure safe operating conditions or to prevent further damage;

- Travel by foot, and use a PID and OVA to continuously monitor the air in the site office and throughout the site; and
- Radio observations to the Operations Manager after checking each area, who will relay findings to the IC.

Recovery

Using the ERT, the IC will coordinate a complete inspection. The team will thoroughly inspect the facility prior to resumption of routine activities. The team will evaluate the landfill for:

- Extent of damage to the cover system, including location and extent of slope failures, surface cracks, and exposed refuse;
- Extent of damage to gas control systems, surface water management system and landfill gas treatment system;
- Extent of damage to access roads;
- Damage to buildings and equipment; and
- Signs of cracking in containment and foundation structures.

A qualified engineer assesses slope failure and any other landfill damages and reports findings. The IC reports findings to regulatory agencies and undertakes measures either to repair damage or to perform other tasks which meet regulatory agency requirements. Emergency response personnel collect, contain, store and transport and hazardous material which may have been released. The IC assists authorities in any situation where the earthquake damages to the site affect neighboring properties or the nearby roads.

11.17 Weather

The IC will assess weather conditions as weather affects the safe operation of the facility. Weather conditions may require the IC to stop work or evacuate the site. Examples of extreme weather and potential resulting hazards include the following:

- Heavy rain–slope failure, run off into neighborhoods or nearby roads;
- High winds–dust, unsafe equipment operations;
- Fog–impaired visibility; and
- Lightning–electrical system failure, fires, personal injury.

Site personnel will inform the IC of any weather-related condition which may affect safe operation of the facility. After normal work hours, the security guard will notify the IC or designee when weather is adverse and when the weather affects site equipment and facilities.

Recovery

Prior to resuming operations the IC will direct the Operations Manager to inspect the site. The Operations Manager will report damages to the IC and coordinate repair of damages.

11.18 Vehicle and Property Incidents

Most vehicle incidents and property damage are minor. These incidents have little effect on the operation of the facility. Site personnel who damage vehicles, equipment, or property must immediately report the incident to the Operations Manager who will notify the Project Manager and HSO immediately. The Operations Manager will prepare an incident report and initiate an incident investigation. The HSO will notify the IC.

The IC assesses the incident. The IC may activate the ERP if the incident causes injury, causes a release, or if the incident causes damage outside of the site. There are two types of property incidents that require activation of the ERP, property damage to adjacent properties and incidents involving landfill integrity. How these types of incidents are handled are detailed in the following:

11.18.1 Property Damage to Adjacent Properties

Personnel who observe that site activities are causing damage or affecting neighboring property will notify the IC. For example, it is possible that a vehicle or heavy equipment could drive off the landfill into a neighboring property. The IC will activate the ERT and will coordinate activities with the Operations Manager to begin the mitigation process. The IC will coordinate other agency notifications. If there are injuries, see Section 11.12. If there are releases, see Section 11.13.

Recovery

Before resuming normal site activities in the area of concern, the IC or designee will ensure that actions are taken to prevent reoccurrence of the event.

11.18.2 Incidents involving Landfill Integrity

During the progress of work activities it is possible for the landfill to collapse or heave if there is void space under a piece of heavy equipment. This opportunity, although slight, requires immediate action to check the condition of the operator and any nearby personnel affected by the collapse. Next, ensure that all equipment has been turned off and assess the area for any releases, especially flammable gases. Personnel must report any collapse of the landfill, no matter how minor, to the IC or HSO.

Recovery

The IC or designee will coordinate status of the landfill. A geotechnical engineer will be consulted before any equipment is removed from an area. Once cleared for removal, the equipment, if contaminated by refuse must be operated by an operator in Level C protection as specified in the SHSP. Subsequently the equipment must be decontaminated.

11.19 Civil Disturbance and Security Incidents

Civil disturbances directed at the site by environmental activists or similar protest groups and riots or insurrections involving adjacent areas which may affect the site due to their own momentum are types of events this plan anticipates. Security incidents such as trespass, vandalism, and bomb threats are also incidents that may affect the operations of the site.

11.19.1 Unauthorized Entry or Trespass

Site Security will immediately notify the IC and "911" of any unauthorized entry or trespass. If there are riots or protests, the IC will:

- Direct Security to Contact "911." (After hours, to avoid delays, site security will call "911" immediately);
- Notify IC or designee;
- Activate the Emergency Operations Center and the ERT; and
- Establish liaison and coordination with responding public agencies.

The IC may:

- Determine need for evacuation of nonessential personnel from the site;
- Direct workers to report to another location or not to report to work if protesters or riots have blocked access to the site;
- Initiate shut down procedures for site equipment and systems to minimize possible release of materials by destructive acts; and
- Direct site personnel to disable nonessential on-site vehicle by removing keys, batteries, rotors, etc., so that vehicle may not be commandeered by participants.

Recovery

The Operations Manager will inspect all equipment and facilities to ensure that there is no damage that affects safe operation. Inspect carefully for possible sabotage of equipment. Report all damages and findings to the IC. Immediately reinstall all fences and gates or provide security guards until all openings are repaired.

11.19.2 Vandalism

The person discovering the vandalism reports it immediately to the Project Manager, who reports the vandalism to the IC. The IC or designee will call police (not "911") to report the damage. The HSO and Operations Manager will investigate the damages and ensure that the area is safe or equipment is safe to use. The HSO will complete an incident report form.

11.19.3 Bomb Threat

The person receiving the bomb threat on the telephone will:

1. Remain calm, not divert the call to another party, and keep the caller on the line as long as possible;
2. Ask the caller to repeat the message;
3. Try to get as much information as possible, such as
   - Location of bomb
   - Type of bomb
   - If the caller placed the bomb and why
   - Name and address of caller (it's worth a try);
4. Immediately contact a supervisor or the IC after the caller hangs up;
5. Keep the phone line open should caller call back; and
6. Write down everything that was said and note information such as:
   - Sex and estimated age of caller
   - Voice quality (angry, calm, excited), accent, speech impediments; and
   - Background noises.

The IC will:

1. Notify "911"; and
2. Direct employees to immediately evacuate the area.

Recovery

The IC will cooperate with investigators. Police and other responding agency personnel shall inspect all areas and equipment before site personnel resume operations.

11.20 Reports and Notifications

Table 1-2 lists emergency contacts and phone numbers. Only those numbers listed as "required" need to be contacted by the IC. All other numbers are used by direction of the IC. Spills and releases require reporting based on the type of material, the quantity of the

material and whether the material is released off-site to the surrounding community. The IC will determine if a spill or release is reportable or may pose a threat to human health.

11.20.1 Reportable Quantities

Federal agencies require additional information if the material released is a Comprehensive Environmental Response, Compensation , and Liability Act of 1980 (CERCLA) hazardous substance that is released in quantities over a certain level, or reportable quantity (RQ), The complete list of CERCLA hazardous substances and RQs is found in 40 CFR 302.4. If an RQ release to the environment occurs, 40 CFR 302.6 requires notification to the National Response Center by Tetra Tech, as soon as the Project Manager has knowledge that the release is an RQ. 40 CFR 355.40 requires immediate notification to the Governor's Office of Emergency Services Warning Center and "911" local emergency response services when an RQ release of a substance not federally permitted for release under CERCLA and which impacts persons outside the boundary of the site occurs. The reporting person will report:

- Name and telephone number of reporter;
- Name and address of facility;
- Name and quantities of material(s) involved to the extent known;
- Medium or media impacted by the release;
- Date, time and duration of the release;
- Proper precautions to take; and
- Known and anticipated health risks.

The reporting person will obtain an assigned number from the agency taking the report. This number is used to document reporting.

11.20.2 Releases onto the Freeway

If liquids flow off-site onto the adjacent freeway, the IC will coordinate the filing of an accident report with the DOT as specified in 49 CFR 195.50 -195.52 whenever there is a fire/explosion, an RQ spill, death, serious injury, or estimated property damage exceeding $5,000 to all parties involved that affects the freeway. The IC shall submit a DOT Form 7000-1 within 30 days.

11.20.3 Internal Reports

Within 24 hours of the emergency incident, the HSO will prepare a written report of the incident. In addition, if the ERP is implemented, within 15 days the HSO or designee will submit a narrative summary of the incident to the Project Manager.

11.21 Post Emergency Procedures

Following the completion of any emergency incident, certain procedures and actions must be completed. Which actions or procedures must be completed depend upon the specific emergency incident which occurred. The following detail the various procedures or actions which may be necessary following an emergency incident.

11.21.1 Emergency Repair Plan

When an incident causes damage to site facilities or infrastructure, the IC or designee will develop and submit to the DTSC for approval, within seven day of the incident, an Emergency Repair Plan. The plan will include a schedule of necessary repairs and the identification of any resulting improvement proposals, including the type of deliverables required and the implementation schedule.

11.21.2 Decontamination of Equipment

Personnel will decontaminate all equipment used in the emergency response and all areas affected by the emergency incident. The SHSP describes decontamination procedures to be used. Personnel will collect all fluids and debris for proper disposal. The IC will ensure that all areas of the site, all equipment, and facilities have been inspected to assure readiness.

11.21.3 Storage and Disposal of Wastes

Tetra Tech is responsible for determining the location and methods for the removal, storage, and disposal of all wastes, materials, soils, and water, subject to DTSC approval.

11.21.4 Post Incident Critique and Assessment

Following any emergency response activity, the HSO will convene a meeting of all ERT members within seven working days. The IC will invite the DTSC and local emergency response agencies to provide input and to participate. The critique will:

- Review overall strategy and tactics employed;
- Effectiveness of ERP elements;
- Successful operations and identification of problems;
- Review lessons learned; and
- Suggest improvements of general and specific operations for the future and suggest amendment of the SHSP to correct identified deficiencies.

The HSO will prepare and distribute a written summary of the critique and assessment within 30 days of the incident. Tetra Tech may forward copies of the written summary to the DTSC and the local emergency response agencies.

TABLES

TABLE 11-1

EMERGENCY RESPONSE TEAM PERSONNEL PHONE LIST AVALON AT SOUTH BAY

Name	Role	Office Phone #	Home Phone #	Pager #	Cellular Phone #
TBD	Project Manager				
TBD	Incident Commander				
TBD	Health and Safety Officer				
TBD	Public Relations Officer				
TBD	Field Operations Chief				
TBD	Evacuation Lead				
TBD	Mitigation Lead				
TBD	Technical/ Environmental Lead				
TBD	Communication/ Documentation Lead				
TBD	Security Lead				

TABLE 11-2

EMERGENCY CONTACT LIST

Contact	Phone Number	Reason to contact
U S Healthworks 19401 S. Vermont Dr., Suite L Torrance, CA 90502	(310) 324-5771	Injuries or expected injuries Chemical Exposures
Los Angeles County Harbor-UCLA Medical Center 1000 W. Carson St. Torrance, CA 90502	(310) 222-2345	Injuries or expected injuries Chemical Exposures
Certified Occupational Physician and Toxicologist , WorkCare™	(800) 455-6155	Injuries or expected injuries Chemical Exposures
National Poison Control Center	(800) 222-1222	Chemical Exposures
Police, Fire or Paramedics	911	**Required for fire, explosion, or evacuation, injuries beyond first aid, all releases which can affect off-site locations, slope failure or damage affecting off-site locations.** Civil disturbance, trespassing, vandalism in progress, vehicle accident
County of Los Angeles:		
County Health and Hazardous Material Division	(323) 890-4089 M-F 8AM-5PM	Release fire or explosion could threaten human health or environment outside of site
Los Angeles Sanitation District	(562) 699 -7411 M-F 8AM-5PM (562) 437-6520 after hours	Release impact or threatens to impact the sewer system
Los Angeles Hazardous Materials Section Fire Department, Administering Agency	(323) 890-4000 M-F 8AM -5PM	Release fire or explosion could threaten human health or environment outside of site

TABLE 11-2

EMERGENCY CONTACT LIST

Contact	Phone Number	Reason to contact
State of California		
Office of Emergency Services	(800) 852-7550	Release fire or explosion could threaten human health or environment outside of site. Contact if 42 gallons or more of oil or petroleum products are discharged to water or there is a potential for that discharge.
California Highway Patrol	911	Notify only if Highway 405 is affected
Caltrans	(213) 897-0383	Notify if Highway 405 or right-of-way is affected
California Regional Water Quality Control Board	(323) 266-7500 M-F 8AM -5PM (323) 774-4238 after hours	Release threatens or impacts water quality
Cal-OSHA	(213) 736-3041	1 or more injuries requiring hospitalization, fatality
Department of Toxic Substances and Control	(714) 484-5300	Release from secondary containment
Federal Agencies		
Environmental Protection Agency Emergency Spill Region IX	(415) 744-2000	Spill occurs on or affects off-site location
U.S. Coast Guard	(562) 980-4450	Contact if release impacts or threatens water quality
Department of Transportation	(202) 366-4484	Notify only if Highway 405 is affected.
National Response Center	(800) 424-8802	Contact if reportable quantity is exceeded

FIGURES

AVALON AT SOUTH BAY

Vicinity Map

Feb. 2008	TETRA TECH	Figure 1-1

AVALON AT SOUTH BAY

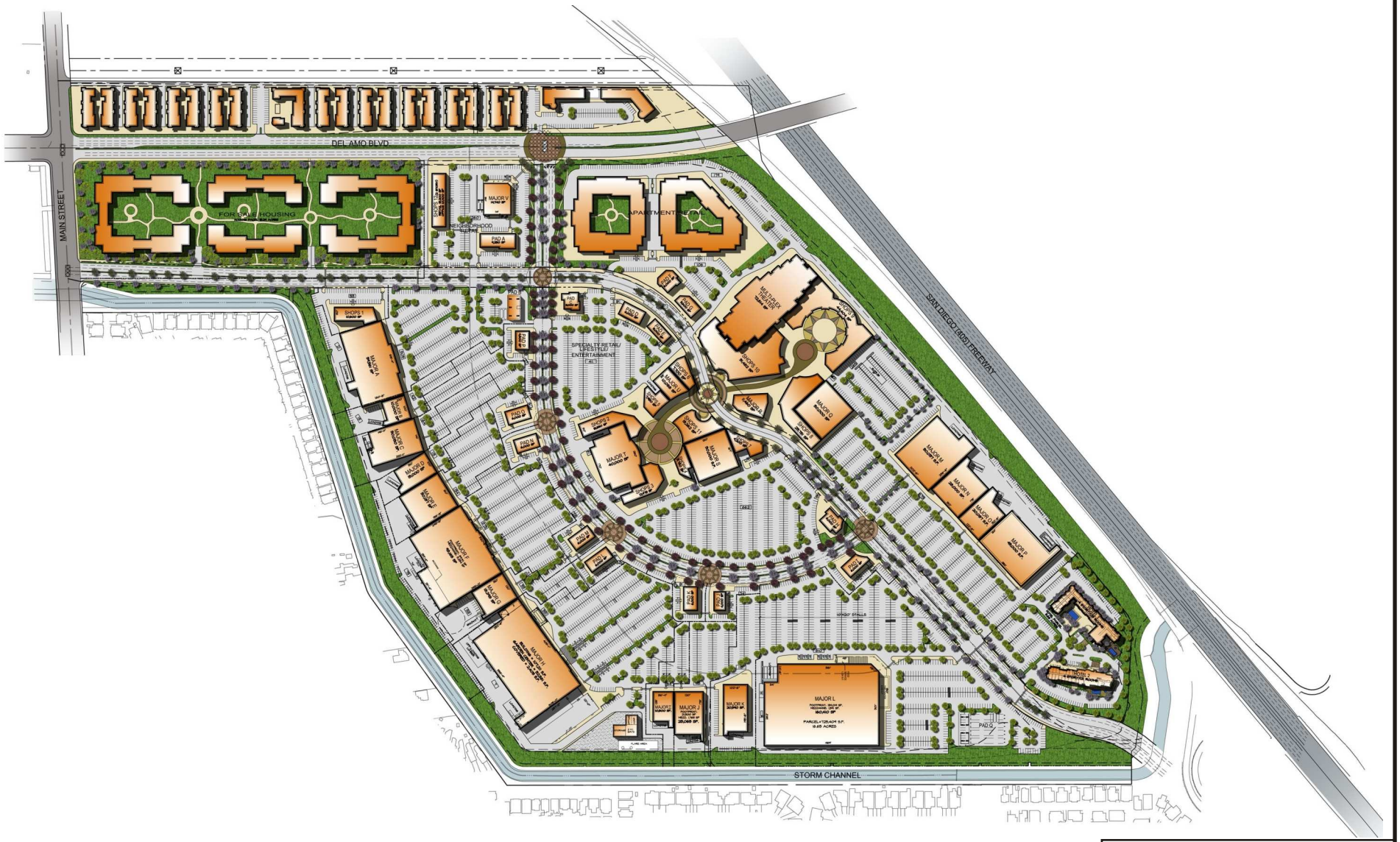
Site Map

Feb. 2008

TETRA TECH

Figure 1-2

X:\GIS\CARSON\AVALONDEV_PLAN.CDR



Development Plan Date: September 17, 2007

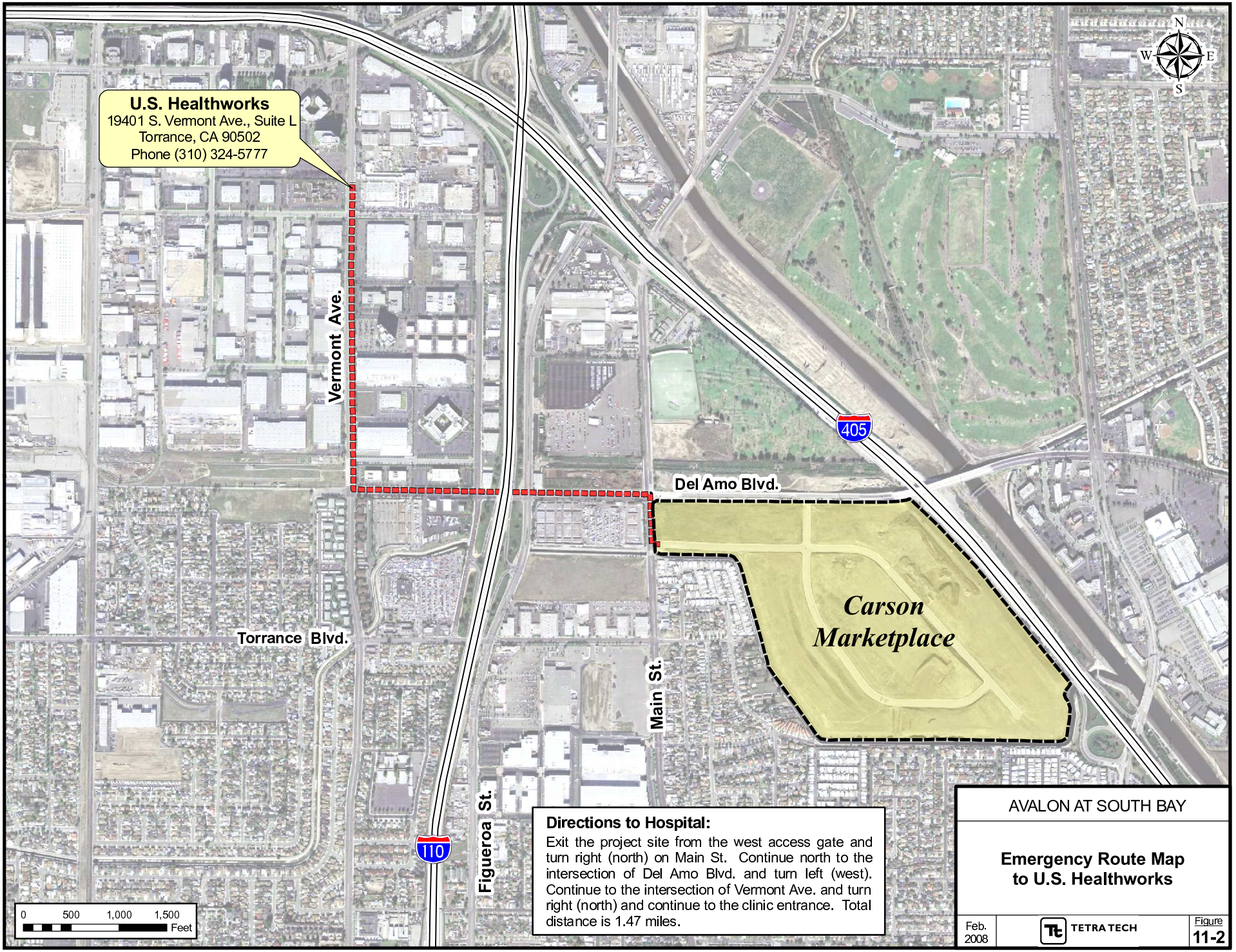
AVALON AT SOUTH BAY

Development Plan

Feb. 2008	TETRA TECH	Figure 1-3


X:\GIS\CARSON-AVALON\EVAC.MXD
Del Amo Blvd.
Main Site Access Gate and Guard Post
Emergency Evacuation Assemby Area
A1
A2
A3
A4
A5
Carson Marketplace
Lenardo Dr.
Stamps Dr.
Main St.
405
Dominguez Channel
Torrance Lateral
N
W
E
S
LEGEND
Evacuation Route
Evacuation Assembly Area
0 200 400 600
Feet
AVALON AT SOUTH BAY
Evacuation Routes and Assembly Areas
Feb. 2008
TETRA TECH
Figure 11-1

X:\GIS\CARSON AVALONUS HEALTHWORKS.MXD



Directions to Hospital:

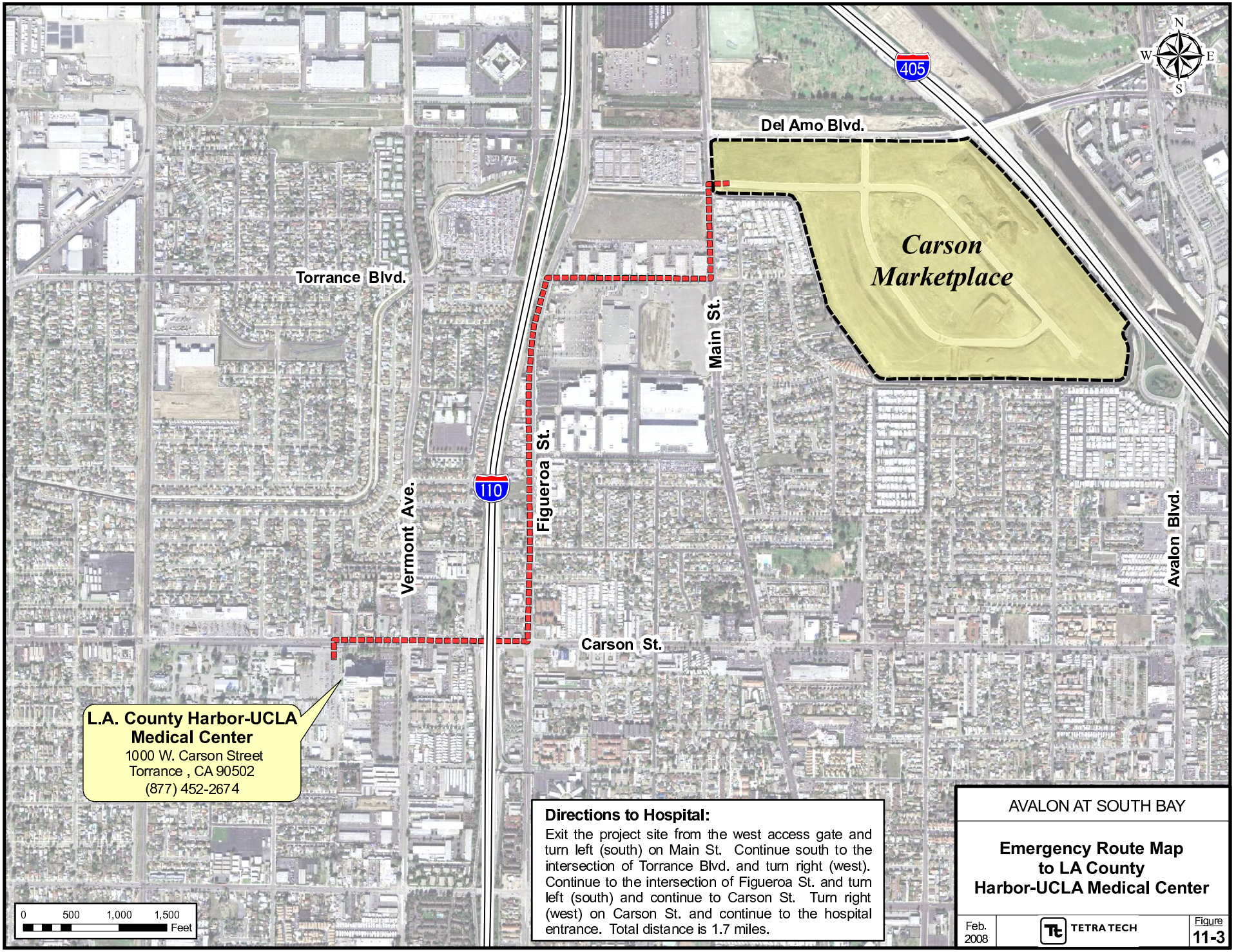
Exit the project site from the west access gate and turn right (north) on Main St. Continue north to the intersection of Del Amo Blvd. and turn left (west). Continue to the intersection of Vermont Ave. and turn right (north) and continue to the clinic entrance. Total distance is 1.47 miles.

AVALON AT SOUTH BAY

Emergency Route Map to U.S. Healthworks

Feb. 2008 | TETRA TECH | Figure 11-2

X:\GIS\CARSON\AVALONHOSP_RT1.MXD



L.A. County Harbor-UCLA Medical Center
1000 W. Carson Street
Torrance , CA 90502
(877) 452-2674

Directions to Hospital:
Exit the project site from the west access gate and turn left (south) on Main St. Continue south to the intersection of Torrance Blvd. and turn right (west). Continue to the intersection of Figueroa St. and turn left (south) and continue to Carson St. Turn right (west) on Carson St. and continue to the hospital entrance. Total distance is 1.7 miles.

AVALON AT SOUTH BAY

Emergency Route Map to LA County Harbor-UCLA Medical Center

Feb. 2008 | TETRA TECH | Figure 11-3

APPENDIX A

AGENCY ACKNOWLEDGMENT OF RECEIPT

Avalon at South Bay Health and Safety Program

Agency Acknowledgment of Receipt

I, _____, hereby acknowledge receipt of the Emergency
name

Response Plan (ERP) for certain Avalon at South Bay activities on _____.
date

This ERP is Section 11.0 of the Site Health and Safety Plan (bound as a separate document), developed by Tetra Tech, Inc., pursuant to the California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC) 1995 Remedial Action Plan (RAP) for the Site.

_____
Signature

_____
Agency