

IV. Environmental Impact Analysis

G. Hazards and Hazardous Materials

1. Introduction

This section evaluates the potential impacts of the proposed Project on human health and the environment due to exposure to hazardous materials or conditions associated with the Project Site, construction, and operation. Potential Project impacts and appropriate mitigation measures or standard conditions are included as necessary. The analysis in this section is based, in part, upon the following source(s):

- Phase I Environmental Site Assessment, Walmart Chapman Site, 15134 South Vermont Avenue and 747, 831, 841 and 861 West Redondo Beach Boulevard, Los Angeles, California 90247, SCS Engineers, October 2016.
- Phase II Soil and Soil Vapor Investigation Report, Walmart Chapman Site, 15134 South Vermont Avenue and 747, 831, 841 and 861 West Redondo Beach Boulevard, Los Angeles, California 90247, SCS Engineers, November 8, 2016.
- Soil Management Plan, Redondo Beach Blvd/Vermont Ave Development, 15134 South Vermont Avenue, Los Angeles, California 90247, SCS Engineers, November 12, 2019.
- Response to SWAPE Letter Comments – re: Prologis Vermont and Redondo Beach Blvd. Industrial Project, SCS Engineers, February 10, 2020.
- The LARWQCB approved the Workplan in two separate letters dated December 4, 2019 (soil vapor) and January 22, 2020 (groundwater portion).

Complete copies of these studies are included in Appendices F1, F2, F3, F4 and F5, respectively, of this Draft EIR.

As described in the Project Background, Section II, Project Description, of this EIR, the City Planning Commission (CPC) previously approved the Project on March 22, 2018 by conditionally approving two conditional use permits (LAMC Sections 12.24 U.14 and 12.24 W.27), a Zoning Administrator's Adjustment (LAMC Section 12.28 A) and a Site Plan Review (LAMC Section 16.05) allowing the development of a 341,402-square-foot warehouse, as set forth in a March 16, 2018 Letter of Determination. The CEQA document originally prepared for that approval was a Mitigated Negative Declaration (MND).

Following the CPC's approval of the Project, two parties appealed the Project. To accommodate the parties' requests, the City is now preparing an EIR prior to the Project moving forward for City consideration and approval. The Appeal Applications submitted by Jean Talaro and Rosalie Preston summarized *Comments on the 15116-15216 South Vermont Ave & 747-761 W. Redondo Beach Blvd and the Harbor Gateway (ENV-2017-1015) Project* prepared by Matt Hagemann of

Soil Water Air Protection Enterprise (SWAPE), both dated March 29, 2018. SCS responded to comments relating to the Phase I Environmental Site Assessment (ESA) prepared by SCS Engineers (SCS) in a Memorandum dated February 10, 2020.

- Comment 1 – page 2, full paragraph 1. The SWAPE letter provided a summary of the Phase I ESA and its conclusions. The Phase I ESA was prepared by SCS, dated October 2016. The letter claimed that the Initial Study/Mitigated Negative Declaration (IS/MND) deferred mitigation to address contaminants known to be associated with the former industrial uses at the Project Site. The letter stated “more analysis and disclosure is needed in a DEIR, such as a Phase II Environmental Site Assessment. A DEIR should be prepared to include the results of further assessment of contaminant releases under a signed voluntary cleanup agreement with the California Department of Toxic Substances Control (DTSC) to ensure protection of construction worker safety and health of nearby residents.”

Response: SCS conducted a Phase II Investigation at the subject site in October 2016, the results of which are summarized in the SCS report dated November 8, 2018, Phase II Soil and Soil Vapor Investigation Report, Walmart Chapman Site. The Phase II is included in Appendix F2 and incorporated herein by reference. Findings from the Phase II have been incorporated into this Draft EIR. Furthermore, the former Pacific Electriccord Company (Electriccord) area (eastern half of the Project Site) is currently an active Cleanup Program Site overseen by the Los Angeles Regional Water Quality Control Board (LARWQCB, Global ID SL0603729001), not DTSC.

Eight groundwater monitoring wells are associated with the Electriccord portion of the Project Site (six on-site and two off-site) that are currently monitored on a semi-annual basis. The LARWQCB has issued a letter dated August 14, 2019, which requested a revised Workplan for the Electriccord site, which is required to include installation of two new groundwater wells, as well as additional groundwater monitoring. On-going investigations and monitoring are also documented below. Because LARWQCB is serving as the State lead agency on this site, DTSC will not be involved in this Project. Rather, LARWQCB will ensure that human health standards are achieved through clean-up and monitoring of the Project Site.

- Comment 2 – page 3, full paragraph 1. The letter again referenced that “despite the heavy industrial use of the site and documentation of chemical release, the IS/MND defers mitigation, to include investigation as recommended in the Phase I, until prior to the issuance of grading permits.”

Response: SWAPE’s assertions are incorrect. As stated above, SCS conducted a Phase II Investigation in October 2016. The investigation assessed all the recognized environmental conditions (RECs) that SCS identified in the Phase I ESA. The Phase II Investigation is included in Appendix F2. Additionally, a Soil Management Plan (SMP; see summary below and Appendix F3) was prepared by SCS to address known and/or potentially impacted areas that may be encountered during any grading, demolition, or construction activities. The SMP will be in effect during soil moving activities and includes explicit instructions for the appropriate handling, storage, and disposal of any known or potentially impacted soil. In addition, the SMP requires air

monitoring activities to monitor the air downwind of the Project Site and appropriate Health and Safety Plans will be employed by site workers.

- Comment 2 – page 3, full paragraphs 2 and 3. The letter stated that “the regulatory process should be allowed to proceed to completion prior to any approval of the proposed Project. A Phase II should be performed. The data gaps are too large and invalidate the IS/MND’s as an adequate information document. Only after investigations and cleanup are documented in a DEIR, can impacts be disclosed and mitigated. Investigations and cleanup should be conducted under a voluntary cleanup agreement with DTSC.
- Additionally, impacts from cleanup activities, including air quality impacts from excavation, truck trips from soil disposal and dust generation, for example, are not contemplated in the IS/MND. A DEIR is necessary to evaluate and disclose these impacts and to mitigate them for the protection of worker safety and the health of nearby residents who would be potentially exposed to contaminated dust.”

Response: As discussed above, this Draft EIR has been prepared as requested by the commenter. Further, a Phase II Investigation has been conducted, and the environmental impacts at the site are well understood. There has been significant regulatory involvement and oversight in remedial activities performed at the site to date and regulatory closures have been issued for various areas of the Project Site by either the LARWQCB or the City of Los Angeles Fire Department (LAFD). These closure activities are summarized below and discussed in the Phase I ESA (see Appendix F1).

- Seven USTs and associated dispensers and piping were removed from the ARCO site in 1989. Hydrocarbon-impacted soil was excavated from the former UST area in 1999, after which a total of approximately 2,933 pounds of hydrocarbons were removed at the Arco site, and vapor concentrations were reduced from 3,200 parts per million by volume (ppmv) to less than 50 ppmv. These levels are below current allowable regulatory limits. Furthermore, 10 groundwater monitoring wells were removed from the site per LARWQCB’s request and closure was granted on December 31, 2012.
- All underground storage tanks (USTs) have been removed from the Virco Manufacturing, Inc. (Virco) property except for one 10,000-gallon UST that was abandoned in place. This UST was filled with “grout” and closed in-place in 1989. Two of the USTs, located in the southeastern portion of the Virco site, were classified as a leaking gasoline UST case. At this location, soil was excavated to 35 feet below ground surface (bgs) under LAFD oversight. After on-going groundwater monitoring, the LARWQCB granted closure in 2013.
- A total of 200 cubic yards of soil was excavated from the former rail spur along the northern Project Site boundary. Confirmation sampling in 2003 showed no

significant contamination remains in this area.

- The former wastewater treatment plant at the northwestern corner of the Project Site was excavated and backfilled to grade with clean imported fill. Sampling performed in 2003 at this location showed no contaminants of concern.
- The tube mill sump, formerly located on the western interior of the Virco building, was removed in 1995, and soil remediation was conducted. Prior to remediation Total Recoverable Petroleum Hydrocarbons (TRPH) was detected in a boring at this location at a concentration of 5,820 parts per million (ppm). Remediation included the removal of approximately 333 tons of soil that was transported for treatment and disposal. Confirmation sampling results conducted after remediation was complete indicated that TRPH detected was below regulatory limits.

One open case remains, with oversight by the LARWQCB, for the eastern half of the Project Site, formerly occupied by Electricord. Routine groundwater monitoring is being conducted, and there are currently plans to do additional work (a revised workplan was submitted to LARWQCB for review and the installation of additional soil vapor probes was approved on December 4, 2019, and installation of additional groundwater monitoring wells was approved on January 22, 2020). The work associated with these workplans is not yet complete (off-site access agreements are in process); however, redevelopment and/or construction activities commonly occur on environmentally impacted sites while ongoing monitoring continues and regulatory cases remain open.

Proper monitoring will be conducted under the SMP that will be in effect during redevelopment activities. If any future work needs to be conducted with regulatory oversight, the appropriate regulatory agency for oversight would continue to be the LARWQCB. DTSC would not be involved in this Project. DTSC and the RWQCBs meet and confer when there is a contaminated site. Because this site overlies a groundwater basin, the agencies agreed that the LARWQCB would be the proper lead agency to oversee remediation. The Project Site will be brought up to regulatory standards regardless of which agency takes the lead on remediation.

Further, Section IV.B, Air Quality, of this Draft EIR, has analyzed air quality impacts related to all construction activities, including, but not limited to, excavation, trucks trips, soil disposal and dust generation.

2. Environmental Setting

a. Regulatory Framework

Several plans, regulations, and programs include policies, requirements, and guidelines regarding hazards and hazardous materials at the federal, State, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include the following:

- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- Occupational Safety and Health Act of 1970
- Hazardous Materials Transportation Act (HMTA)
- Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution In Commerce, And Use Prohibitions
- Emergency Planning and Community Right-to-Know Act
- Research and Special Programs Administration (RSPA)
- Toxic Substances Control Act
- Requirements for Phase I Environmental Site Assessments
- California Division of Occupational Safety and Health
- California Health and Safety Code
- California Code of Regulations Title 23, Division 3, Chapter 16 Underground Storage Tank Regulations
- Health and Safety Code § 25500 et seq. Hazardous Materials Release Response Plans and Inventory Law
- California Hazardous Waste Control Law
- California Hazardous Materials Disclosure Programs
 - Hazardous Materials Release Response Plans and Inventories (business plans)
 - California Accidental Release Prevention (CalARP) Program
 - Underground Storage Tank (UST) Program
- Hazardous Materials Business Plans
- Hazardous Materials Transportation
- South Coast Air Quality Management District Rule 1166
- South Coast Air Quality Management District Rule 403
- South Coast Air Quality Management District Rule 402
- City of Los Angeles General Plan Safety Element
- City of Los Angeles Hazard Mitigation Plan
- City of Los Angeles Municipal Code (LAMC)
- City of Los Angeles Fire Department and Certified Unified Program Agency (CUPA)
 - Hazardous Materials Business Plans
 - Hazardous Materials Release Response Plans and Inventory Program

- California Accidental Release Prevention Program, a combination of federal and state programs for the prevention of accidental release of regulated toxic and flammable substances
- Underground Storage Tanks Program
- Aboveground Petroleum Storage Act Program
- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs Program
- Hazardous Materials Management Plan (HMMP) and Hazardous Material Inventory Statement (HMIS) in California Fire Code Program
- Los Angeles Fire Code

(1) Federal

a. *Resource Conservation and Recovery Act*

The Resource Conservation and Recovery Act (RCRA) of 1976 (42 United States Code [USC] Sections 6901 through 6992k) is the principal federal law that regulates the generation, management, and transportation of waste. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste. The RCRA gave the U.S. Environmental Protection Agency (USEPA) the authority to control hazardous waste from “cradle to grave” (i.e., from generation to transportation, treatment, storage, and disposal) at active and future facilities. It does not address abandoned or historical sites. The RCRA also set forth a framework for managing nonhazardous wastes. Later amendments required phasing out land disposal of hazardous waste and added underground tanks storing petroleum and other hazardous substances.

b. *Comprehensive Environmental Response, Compensation, and Liability Act*

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, providing for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also establishes the National Priorities List, which is a list of contaminated sites warranting further investigation by the USEPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.¹

¹ Environmental Protection Agency, “Summary of the Comprehensive Environmental Response, Compensation, and Liability Act (Superfund)”. Accessed on August 14, 2021 at: <https://www.epa.gov/laws-regulations/summary-comprehensive-environmental-response-compensation-and-liability-act>

Phase I Environmental Site Assessments in compliance with the American Society for Testing and Materials (ASTM) E1527-13, Standard for Environmental Site Assessments, are required for land purchasers to qualify for the Innocent Landowner Defense under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), to minimize environmental liability under other laws, such as RCRA, and as a lender prerequisite to extend a loan for purchase of land.

c. Occupational Safety and Health Act

The federal Occupational Safety and Health Act (OSHA) of 1970 (29 USC Sections 651 et seq.) authorizes each state (including California) to establish their own safety and health programs with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) approval.

d. Code of Federal Regulations Title 49 and Title 40

Title 49 of the Code of Federal Regulations (CFR), Hazardous Materials Transportation Act, provides regulatory and enforcement authority to the Secretary of Transportation to reduce risks to life and property from hazards associated with the transport of hazardous materials.

Title 40 of the CFR, *Protection of Environment, Part 761, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions*, governs the known release of PCBs.

e. Emergency Planning and Community Right-to-Know Act

Title III of the Superfund Amendments and Reauthorization Act (SARA) authorized the Emergency Planning and Community Right-to-Know Act (EPCRA; 42 USC Sections 11001 et seq.) to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored on-site to state and local agencies; releases to the environment of more than 600 designated toxic chemicals; off-site transfers of waste; and pollution prevention measures and activities and to participate in chemical recycling. The USEPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by certain industry groups and federal facilities—the Toxics Release Inventory.

To implement EPCRA, each state appointed a state emergency response commission to coordinate planning and implementation activities associated with hazardous materials. The commissions divided their states into emergency planning districts and named a local emergency planning committee for each district. The federal EPCRA program is implemented and administered in California Governor's Office of Emergency Services (Cal OES), a state commission, 6 local committees, and 81 Certified Unified Program agencies (CUPAs). Cal OES coordinates and provides staff support for the commission and local committees.

f. Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the USEPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals, including PCBs, asbestos, radon, and lead-based paint.

(2) State

a. Division of Occupational Safety and Health

The California Division of Occupational Safety and Health (Cal/OSHA) is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA obligates many businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Hazard Communication Standard requires that workers be informed of the hazards associated with the materials they handle.

Furthermore, Cal/OSHA enforcement units conduct on-site evaluations and issue notices of violation to enforce necessary improvements to health and safety practices. California standards for workers dealing with hazardous materials are contained in Title 8 of the California Code of Regulations (CCR) and include practices for all industries (General Industrial Safety Orders), and specific practices for construction and other industries. Workers at hazardous waste sites (or working with hazardous wastes as might be encountered during excavation of contaminated soil) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations.

b. California Health and Safety Code

CalEPA has established rules governing the use of hazardous materials and the management of hazardous wastes. California Health and Safety Code Sections 25531, et seq. incorporate the requirement of SARA and the Clean Air Act as they pertain to hazardous materials. Health and Safety Code Section 25534 directs owners or operators storing, handling, or using regulated substances exceeding threshold planning quantities to develop and implement a Risk Management Plan. The Risk Management Plans are submitted to the administering agency and possibly USEPA, depending upon the chemical and the amount, for review.

c. Underground Storage Tank Regulations

The California Code of Regulations (CCR), Title 23, Division 3, Chapter 16 includes requirements for USTs. The requirements are intended to protect waters of the State from discharges of hazardous substances from underground storage tanks. These regulations establish construction requirements for new underground storage tanks; establish separate monitoring requirements for new and existing underground storage tanks; establish uniform requirements for unauthorized release reporting, and for repair, upgrade, and closure of underground storage tanks; and specify variance request procedures.

d. Hazardous Materials Release Response Plans and Inventory Law

The Hazardous Materials Release Response Plans and Inventory Law (Health and Safety Code Section 25500 et seq.) aims to minimize the potential for accidents involving hazardous materials and to facilitate an appropriate response to possible hazardous materials emergencies. The law requires businesses that use hazardous materials to provide inventories of those materials to designated emergency response agencies, to illustrate on a diagram where the materials are stored on-site, to prepare an emergency response plan, and to train employees to use the materials safely. Any business that handles hazardous materials in quantities equal to or greater than 55 gallons, 500 pounds, or 200 cubic feet of gas must submit a business plan.

e. Hazardous Waste Control Law

The State of California has developed the California Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC] Sections 25100 et seq. and 22 CCR Sections 66260.1 et seq.), which is modeled after the RCRA and is the primary statute establishing requirements that govern RCRA and non-RCRA hazardous waste. Unlike the RCRA, the HWCL does not recognize a threshold below which generators are exempt from some or all of the HWCL requirements.

Primary authority for the Statewide administration and enforcement of the HWCL rests with the DTSC. DTSC is responsible for and/or provides oversight for contamination cleanup and administers the Statewide hazardous waste reduction programs. Furthermore, the HWCL, similar to the RCRA, requires businesses to prepare biennial hazardous waste reports that identify the nature and quality of each type of hazardous waste generated and the treatment, disposal method, and facilities used for each waste. These reports must be submitted to DTSC.

f. Hazardous Materials Disclosure Programs

The Unified Program administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include: Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention (CalARP) Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by CUPAs.

CalARP aims to be proactive and, therefore, requires businesses to prepare risk management plans, which are detailed engineering analyses of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential.

g. Hazardous Materials Business Plans

Both the federal government (Code of Federal Regulations) and the State of California (California Health and Safety Code) require all businesses that handle more than a specified amount—or “reporting quantity”—of hazardous or extremely hazardous materials to submit a hazardous materials business plan to its CUPA.

LAFD currently reviews submitted business plans and updates. Businesses that handle hazardous materials are required by law to provide an immediate verbal report of any release or threatened release of hazardous materials if there is a reasonable belief that the release or threatened release poses a significant present or potential hazard to human health and safety, property, or the environment. LAFD is also charged with the responsibility of conducting compliance inspections of regulated facilities within the City of Los Angeles.

h. Hazardous Materials Transportation

Section 31303 of the California Vehicle Code and U.S. Department of Transportation (USDOT) regulate hazardous materials transport. The California Highway Patrol (CHP) and California Department of Transportation (Caltrans) are the enforcement agencies. Cal OES provides emergency response services involving hazardous materials incidents.

(3) Regional

a. South Coast Air Quality Management District Requirements

The South Coast Air Quality Management District (SCAQMD) Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities:

- The excavation of an underground storage tank or piping which has stored volatile organic compounds (VOCs).
- The excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs.
- The handling or storage of VOC-contaminated soil at or from an excavation or grading site.
- The treatment of VOC-contaminated soil at a facility.

Rule 403 is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust, and requires best available control measures to be applied to earth moving and grading activities. In general, the rule prohibits new developments from the installation of wood-burning devices.

Rule 402 is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or

have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

(4) Local

a. City of Los Angeles General Plan Safety Element

The Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster. It replaces three previously adopted elements of the City's General Plan: the Safety Element, Fire Protection and Prevention Element, and Seismic Safety Element. All three have been revised and combined into the Safety Element. The last section of the Safety Element contains goals, objectives, policies and broadly stated programs. The programs outlined are programs of the City Emergency Operations Organization (EOO). The EOO is the City agency (program) which implements the Safety Element.

b. City of Los Angeles Hazard Mitigation Plan

The City of Los Angeles has completed the 2017 Hazard Mitigation Plan (HMP) to lessen the vulnerability to disasters and demonstrate the City's commitment to reducing risks from natural hazards. An HMP serves as a guide for decision makers as they commit City resources to minimize the effects of natural hazards. The HMP is intended to integrate with existing planning mechanisms such as building and zoning regulations, long-range planning mechanisms, and environmental planning. The planning process includes conducting a thorough hazard vulnerability analysis, creating community disaster mitigation priorities, and developing subsequent mitigation strategies and projects.²

c. City of Los Angeles Municipal Code (LAMC)

LAMC Chapter V, Article 4, Liability for Violation of Hazardous Waste and Substance Control Laws, establishes liability for reimbursement of the City's expenses incurred in connection with corrective action necessitated by violations of the hazardous waste and substance control laws. It also requires preparation of a hazardous materials clearance report before contaminated property is transferred.

d. City of Los Angeles Fire Department

A Certified Unified Program Agency (CUPA) is an agency of a county or city that administers several State programs regulating hazardous materials and hazardous wastes. LAFD is the CUPA for the Project Site. The CUPA administers the following programs:

- Hazardous Materials Business Plans
- Hazardous Materials Release Response Plans and Inventory Program

² *City of Los Angeles Emergency Management Department (Los Angeles). 2019, City of Los Angeles Hazard Mitigation Plan Revision. <https://emergency.lacity.org/hazard-mitigation-plan>.*

- California Accidental Release Prevention Program, a combination of federal and state programs for the prevention of accidental release of regulated toxic and flammable substances
- Underground Storage Tanks Program
- Aboveground Petroleum Storage Act Program
- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs Program
- Hazardous Materials Management Plan (HMMP) and Hazardous Material Inventory Statement (HMIS) in California Fire Code Program.

e. City of Los Angeles Fire Code

The City of Los Angeles Fire Code is codified as Article 7 of Chapter V of the LAMC and was adopted in 2017. The Los Angeles Fire Code is a combination of the California Fire Code and the Los Angeles amendments. The purpose of the fire code is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations.

b. Existing Conditions

(1) Current Conditions of the Project Site

The Project Site is currently unoccupied, surrounded by a chain link fence with three large concrete slab foundations, which are the remains of former manufacturing facilities: Virco on the western half and Electriccord on the eastern half of the Project Site. Most of the areas surrounding the slabs are paved with asphalt and concrete in fair to poor condition. Several concrete-filled trenches and sumps are also located in the eastern half of the Project Site. Since only bare concrete slabs from former buildings are present on the Project Site, there are no ACMs on the Project Site.

(2) Historical Uses of the Project Site

Between 1896 and the late 1940s, development on the Project Site included cultivated agricultural land, a field track, a Pacific Electric Rail Company rail switch gallery/substation, a restaurant, a nursery, and private dwellings and/or farmhouses. A gas station was located at the southwestern corner of the Project Site possibly as early as 1927. Between 1952 and 1989, the station was known as the Arco gas station. A total of seven USTs and associated dispensers and piping were removed from the former Arco gas station site in 1989. Development of the Virco facilities on the western side of the Project Site began around 1947. Virco manufactured desks, chairs, and other institutional furniture. The Electriccord facilities on the eastern side of the Project Site were developed beginning in the early 1960s. Following the year 2000, Leviton replaced Electriccord on the eastern side of the Project Site, and a series of businesses and a church occupied the former Virco facilities on the western side. Electriccord and Leviton manufactured electrical extension

cords and other electrical equipment on the Project Site between approximately 1961 and 2004. The Virco and Electriccord buildings, which comprised approximately 505,000 square feet, were demolished in 2010 and 2011. All of the above-grade structures were demolished with the exception of a storage area for truck trailers, dumpsters, and other equipment at the northeastern corner, which has since been removed from the Project Site.

A 1950 building permit issued to Virco indicated that an industrial/domestic incinerator was installed outside the southeastern corner of the original Virco building footprint. By 1963, the building was expanded over the area where the incinerator was located. Furthermore, as many as 12 USTs (including the 7 former Arco USTs) have historically been located at the former Virco site. The former UST areas have been remediated, investigated, and/or closed by LARWQCB. One 10,000-gallon kerosene-based wash thinner UST was abandoned in place due to its location beneath a building ramp (see Appendix F1). This UST was filled with grout and closed in-place in 1989.

(3) On-going Monitoring

The former Electriccord area (eastern half of the Project Site) is currently an active Cleanup Program Site overseen by LARWQCB (Global ID SL0603729001). Six groundwater monitoring wells exist on the Electriccord portion of the Project Site (along with two off-site) that are currently monitored on a semi-annual basis. Additional testing and remediation work is on-going on the site in coordination with LARWQCB.

Waterstone Environmental, Inc. prepared a Workplan for Supplemental Soil Vapor Survey and Installation of Additional Groundwater Monitoring Well (Workplan) dated October 31, 2019. The Workplan proposes installing two multi-depth groundwater monitoring wells (one in the southwest corner of the site, and one off-site), in addition to ten on-site permanent soil vapor probes. The LARWQCB approved the Workplan in two separate letters dated December 4, 2019 for the soil vapor portion and on January 22, 2020 for the groundwater portion, which are included in Appendix F5 of this Draft EIR. Additionally, the Virco (western) portion of the Project Site historically had three monitoring wells, but it is unclear if one or all of these wells currently remain. In addition, ten abandoned groundwater wells (associated with the former gas station) and evidence of other soil and soil vapor borings, as well as a few areas where past soil remediation was conducted, were all observed across the Project Site during the October 2016 site inspection for the Phase I ESA as shown in Appendix F1 of this Draft EIR.

(4) Phase I Environmental Site Assessment

SCS Engineers (SCS) prepared a Phase I ESA (see Appendix F1 of this Draft EIR) in conformance with 40 CFR 312, Standards for Conducting All Appropriate Inquiries, and ASTM E1527-13, Standard for Environmental Site Assessments. The Phase I ESA was based on:

- Interviews with past and/or present owners, operators, and/or occupants of the Project Site.
- Reviews of federal, tribal, state, and local government records.

- Visual inspections of the Project Site and adjoining properties performed on October 10, 2016.
- Review of historical property use information (topographic maps, aerial photographs, fire insurance maps, existing reports, etc.).
- Commonly known or reasonably ascertainable information about the Project Site (e.g., interviews with appropriate regulatory agency personnel and review of agency files review of available documents, interviews with other knowledgeable persons).
- Degree of obviousness of the presence or likely presence of contamination at the Project Site, and the ability to detect the contamination by appropriate investigation.
- Information provided as a result of the additional inquiries conducted by the User.

Based on a review of the information for the former Virco site, the following RECs were identified as part of the Phase I ESA investigation:

- **Oil Stained Building Slab:** A site inspection revealed heavy oil staining across the southwestern and western sides of the former Virco building slab, in areas that historically housed Virco tube mills and machine/maintenance shops. Based on the field observations, the heavy oil stained concrete at the former Virco site was identified as a REC.
- **Former Industrial Incinerator:** Industrial incinerators are commonly associated with releases of heavy metals and other potential contaminants of concern. Review of historical information found that the area, where the former Virco incinerator was located, did not appear to be investigated during previous rounds of investigation and was, therefore, identified as a REC.
- **Former Hydrocarbon Release:** Elevated concentrations of Total Petroleum Hydrocarbons (TPH) (up to 11,000 milligrams per kilogram (mg/kg)) were identified on the west side of the former Virco building and were not defined. Therefore, the area of the former hydrocarbon release was identified as a REC.
- **Underground Storage Tanks:** The absence of complete information about the removal of all USTs at the former Virco side of the Project Site was identified as a REC.

A total of approximately 750 tons of metals-impacted soil and 333 tons of petroleum hydrocarbon-impacted soil were excavated and removed from the former Virco portion of the Project Site. Human health risk assessments (HHRA) conducted in 2009 and 2010 to evaluate risks from VOCs in soil vapor reported that there was low vapor intrusion risk to human health (less than one in a million [1×10^{-6}] cancer risk) under a residential scenario. An incremental cancer risk of 1×10^{-6} (one in a million) or less for a particular carcinogenic chemical is considered negligible by

California regulatory agencies. It should be noted that residential screening levels are much more conservative than the commercial/industrial screening levels that would be required for Project development at the Project Site. OEHHA reviewed these HHRAs and concurred with the finding. Based on the results of previous investigations and of remediation, LARWQCB issued a “No Further Action” (NFA) determination for the Virco Cleanup Program case on September 13, 2011. A NFA determination is made after the owner or operator meets all appropriate corrective action requirements, the case is determined to be closed, and no further work is required for the former Virco site. However, as discussed below, the Phase II Investigation conducted by SCS on the entire site (see Appendix F2 of this Draft EIR) identified tetrachloroethene (PCE) at concentrations up to 21 micrograms per liter ($\mu\text{g/l}$) in soil vapor samples obtained from a depth of five feet on both the former Virco portion and Electricord portion of the site which remains under regulatory oversight. Furthermore, the NFA letter indicated that three onsite monitoring wells (V-MW1, V-MW2, and V-MW3) must be abandoned. The subsequent abandonment was documented in a report dated December 1, 2011 by Waterstone Environmental, Inc. Additionally, three wells (MW-1, MW-2, MW-3) associated with a previous UST that has also received an NFA status (see Appendix F5 of this Draft EIR, RWQCB letter dated January 22, 2013) are still present at the Project Site and would be abandoned prior to or during any future redevelopment.

LARWQCB issued closure for the former Arco gas station in a letter dated December 31, 2012. The Arco site was closed under the SWRCB Low-Threat Underground Storage Tank Case Closure Policy³. Concentrations of fuel-related contaminants remain in place, but the levels are below current allowable regulatory limits and would be managed in accordance with the SMP during future redevelopment activities. The former Arco site located at the southwestern corner of the Project Site is considered a historical recognized environmental condition (HREC), which is a past release that has been remediated to below “residential” standards and given regulatory closure with no use restrictions.

Documents reviewed for the former Virco site, including the former Arco site located at the southwestern corner of the Project Site, and the closure letters issued by the regulatory agency constitute important verification of past remediation efforts. Much of the former Virco site has been investigated to the satisfaction of regulatory authorities and contamination remaining in place is considered a controlled recognized environmental condition (CREC). CRECs include residual hazardous substances allowed to remain in place subject to the implementation of required controls (e.g., property use restrictions, activity and use limitations, institutional controls, or engineering controls).

Based on a review of previous investigations and remediation activities for the Electricord portion of the Project Site, the following RECs were identified:

- **Oil Stained Building Slab:** Heavy oil staining was observed at the central-western portion of the central concrete slab and, similar to the Virco site, was identified as a REC.

³ *The Low-Threat Underground Storage Tank Case Closure Policy establishes closure criteria for petroleum release cases that pose a low threat to human health and the environment.*

- **Elevated VOCs in Soil Vapor and Groundwater:** VOCs in soil vapor have been evaluated, and the cancer risk from vapor intrusion has been demonstrated to be below the regulatory screening levels (less than one in a million) for a residential land use scenario. It should be noted that residential screening levels are much more conservative than the commercial/industrial screening levels that would be required for Project development at the Project Site. VOC concentrations in groundwater both beneath the former Electriccord site and downgradient of this site exceed regulatory screening levels. To address groundwater contamination originating at the former Electriccord site, a Remedial Action Plan (RAP) proposed monitored natural attenuation (MNA). The RAP anticipates monitoring will be conducted for an estimated 5 to 8 years until chlorinated VOC concentrations are below their respective Maximum Contamination Levels (MCLs) for California drinking water. Based on the available information, the groundwater contamination remaining at the Project Site was identified as a REC.
- **Elevated Chlorinated VOC Levels:** Samples from borings at the northern end of the western Electriccord building slab contained chlorinated VOCs (PCE, TCE, and cis-1,2-DCE) at concentrations up to 25 micrograms per kilogram ($\mu\text{g}/\text{kg}$). Although below current regulatory screening levels for soil (2,700, 6,000, and 84,000 $\mu\text{g}/\text{kg}$, respectively), based on the potential for vapor intrusion and known impacts to groundwater, the residual contamination was identified as a REC.
- **Residual Contamination of Copper, Ethylbenzene, and Xylenes:** One previous boring on the northwestern portion of the former Electriccord site found an elevated concentration of copper at 15 feet bgs detected at 9,200 mg/kg (well below the commercial regulatory screening limit of 47,000 mg/kg), with negligible copper concentrations at 5 and 10 feet bgs (up to 21 mg/kg). LARWQCB requested additional samples in the area, which did not identify any elevated copper concentrations. It was, therefore, determined that only a small, isolated area was impacted with copper at deeper depths, and no exposure pathway for impact to human health exists; therefore, no further investigation of the metal was recommended. One boring in the northwestern portion of the former Electriccord site contained ethylbenzene (up to 100 $\mu\text{g}/\text{kg}$) and xylenes (up to 291 $\mu\text{g}/\text{kg}$) indicating that contamination remains in place in this area. Although these concentrations are below regulatory screening levels warranting cleanup for commercial sites (25,000 $\mu\text{g}/\text{kg}$ for ethylbenzene and 2,500,000 $\mu\text{g}/\text{kg}$ for xylenes), the residual impact remaining in place was identified as a REC.

The former Electriccord portion of the Project Site continues to be investigated with oversight by the LARWQCB. Electriccord's operations resulted in unauthorized discharges of contaminants into the subsurface. Remediation activities were identified in two areas at the former Electriccord site, including 1) a former rail spur between the Electriccord and Virco sites, where the upper 6 to 12 inches of soil was excavated to the satisfaction of the Los Angeles County Department of Health

Services (DHS); and 2) approximately 123 tons of TPH and VOC impacted-soil were removed from a former emulsion tank and hazardous material area on the site and transported to a permitted facility. Soil confirmation sampling identified concentrations of cis-1,2-dichloroethene (up to 3.5 ug/kg), ethylbenzene (up to 200 ug/kg), xylenes (up to 1,480 ug/kg), and 1,3,5-trimethylbenzene (up to 150 ug/kg). These levels were all below their respective screening levels (86,000 ug/kg or higher); however, LARWQCB considered them possible sources of VOCs in groundwater, which continues to be investigated with LARWQCB oversight. Six groundwater monitoring wells have been installed to monitor changes in the groundwater contamination.

Regulatory database information identified few known and suspected contamination sites in the surrounding area. Based on a review of the database information, fuel releases from USTs have occurred at adjoining sites to the northeast and south. These cases have been investigated and remediated to the satisfaction of appropriate regulatory authorities who closed the cases. While residual contamination remains at these sites, they are situated cross- and downgradient from the Project Site. Given the case status and locations, it is unlikely that these sites have affected the environmental condition on the Project Site. No other sites with specific evidence of releases likely to affect the Project Site were identified.

(5) Phase II Soil and Soil Vapor Investigation Report

On October 21, 2016, SCS conducted soil and soil vapor investigations at the Project Site. The objective of this investigation was to assess the RECs identified in the Phase I ESA, as previously discussed. The investigation activities included:

- A site-wide soil vapor survey, consisting of 14 locations sampled at 5 feet bgs. Locations were placed across the Project Site, including in the areas of the former Virco site, Arco station, Electriccord site, stormwater runoff points, and others across the Project Site to confirm current VOC concentrations and to supplement previous studies.
- The Phase I ESA site inspection identified areas at both the Virco and Electriccord sites where significant oil staining and potential seeping on building slabs, which were only partially assessed by previous investigations. Therefore, SCS collected:
 - Four concrete cores from the areas of staining to assess the extent of oily contamination within the concrete and its potential re-use/recycling. Eight concrete samples were analyzed for TPH and PCBs.
 - Subslab soil samples were collected and analyzed for PCBs, TPH and VOCs.
- Soil samples were collected from the west side of the former Virco building, where a former hydrocarbon release was suspected. Samples were analyzed for TPH. The source of this TPH may have been a UST or the hazardous materials storage in this area, which appears to not have been remediated or further investigated.
- Soil samples were collected in the area of the Electriccord site, where elevated levels

of chlorinated VOCs were previously detected and were analyzed for TPH and VOC to confirm the nature and extent of contamination and to supplement previous investigations.

- Soil samples were collected from the northwestern portion of the former Electriccord site, where elevated levels of copper, ethylbenzene, and xylenes were previously detected. Samples were analyzed for TPH, VOCs, and metals.
- Two borings were placed in the area of the historical industrial incinerator at the Virco site to assess the potential for contamination by metals and semi-volatile organic compounds (SVOCs).
- In addition, selected soil samples, either with field indications of contamination and/or representative samples from across the Project Site, were analyzed for SVOCs.

a. Soil Vapor Sampling Results

Perchloroethylene (PCE)⁴ was the most prevalent VOC detected in the soil vapor samples at both Virco and Electriccord sites (detected in 11 of 15 samples at concentrations of 0.2 to 21 micrograms per liter [ug/L]). PCE was detected in four samples above the recommended screening level at the time for commercial/industrial sites of 4.2 ug/L.

b. Soil Sampling Results

Soil samples were collected and analyzed at both Virco and Electriccord sites for TPH, VOCs, SVOCs, metals, and PCBs. None of the soil samples analyzed for PCBs contained detectable concentrations, and metals were detected at, or below, concentrations typically found in Southern California soils. The analytical results for all metal samples collected were below their corresponding regulatory screening levels for soils at commercial/industrial sites and do not represent a risk to human health. SVOCs detected in soil samples were below their corresponding regulatory screening levels for commercial/industrial land use.

Investigations have shown “residual concentrations” of TPH and VOCs in shallow soil in both remediated and un-remediated areas. TPH was detected in one shallow sample (0.5 feet bgs) at concentrations above screening levels; otherwise concentrations were well below screening levels or not detected. Furthermore, the concentrations of all VOCs detected were well below their corresponding regulatory screening levels for soils for commercial/industrial sites.

c. Concrete Core Sampling Results

TPH was detected at both Virco and Electriccord sites in concrete cores above the screening levels for commercial/industrial sites. Of the eight concrete samples analyzed, only one contained a

⁴ PCE is a nonflammable colorless organic liquid with a mild, chloroform-like odor. It is used in the textile industry, as a component of aerosol dry-cleaning products, as a metal degreasing solvent, and as a chemical intermediate.

detectable concentration of PCB. The PCB concentration was below the DTSC screening level for commercial/industrial land uses and would not be a concern to a regulatory agency.

3. Environmental Impacts

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials if it would:

Threshold (a): Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Threshold (b): Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

Threshold (c): Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

Threshold (d): Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;

Threshold (e): For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;

Threshold (f): Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;

Threshold (g): Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate hazards and hazardous materials impacts include:

Risk of Upset/Emergency Preparedness

- Compliance with the regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the Project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

Human Health Hazards

- Compliance with the regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

b. Methodology

This analysis evaluates the potential impacts of the proposed Project on human health and the environment due to potential exposure of hazardous materials or conditions associated with the Project Site, construction, and operation. The evaluation of hazardous conditions and materials associated with construction and operation of the Project is based largely on the Phase I ESA and Phase II ESA prepared for the Project and included in Appendix F2 of this Draft EIR. The Phase I ESA was conducted in accordance with the ASTM Standard of Practice E1527-13 and the standards of care and diligence normally practiced by recognized consulting firms in performing services of a similar nature. The assessment included:

- Site inspection to verify current Site conditions, and check for visible evidence of previously disposed and/or currently present hazardous waste, surface contamination, underground and above ground storage tanks (USTs/ASTs), suspect PCBs, and other potential environmental hazards.
- A visual survey of the adjacent properties and the immediate vicinity to determine if any nearby sites posed a significant environmental threat to the site.
- Reviews federal, tribal, state, and local government records (as presented in a database report provided by Environmental Data Resources [EDR]).
- Review of available site investigation documents (if any) to assess the potential for onsite contamination. Review of historical records covering site history from currently and readily available documents, including topographic maps, aerial

photographs, fire insurance maps, and other accessible records.

- Consultation with appropriate governmental agencies having jurisdiction relative to the past history of the Project Site, complaints or incidents in the immediate area, and permits that may have been issued.

A Phase II ESA consisting of soil and soil vapor sampling was conducted on October 21, 2016, to assess the RECs identified during the preparation of the Phase I ESA. Soil sampling was conducted using a direct-push drill rig with samples collected in pre-cleaned sleeves, preserved (as necessary), and tracked using proper chain-of-custody procedures from point of collection through an accredited laboratory. Soil vapor sampling was conducted in general accordance with the Advisory – Active Soil Gas Investigations, published by the Los Angeles and San Francisco RWQCBs and DTSC in July 2015. The soil and soil vapor sampling clarified the RECs and resolved data gaps identified during the Phase I ESA.

c. Project Design Features

The following Project Design Features are proposed with regard to hazards and hazardous materials:

HAZ-PDF-1:

The proposed Project will implement the requirements of the SMP (see Appendix F3) during soil moving activities and includes explicit instructions for the appropriate handling, storage, and disposal of any known or potentially impacted soil. The general contractor will be required to follow the requirements of the SMP and stop work to make notification to the environmental team if any potential impacts are observed at any time the environmental team is not already on-site. The SMP also requires air monitoring activities to monitor the air downwind of the Project Site and appropriate Health and Safety Plans that will be employed by site workers. The SMP identifies requirements intended to protect human health when soil in certain areas of known or suspected impacts are disturbed for any reason, including, without limitation, as a result of demolition, utility installation/repair, soil excavation, drilling, grading/filling activities, stockpile generation, soil management, loading, and transportation. Requirements of the SMP include:

- **Health and Safety Plan (HASP):** A HASP will be prepared and in effect for all activities associated with the SMP and other activities at the Project Site. Contractors working onsite are expected to be operating under their own health and safety plans.
- **Environmental Monitoring:** In accordance with South Coast AQMD Rules, air monitoring will be necessary in areas where potential VOC contaminated soil are to be disturbed. Air monitoring for dust may also be required in other areas. An air

monitoring/health and safety professional will be present during relevant activities and responsibilities will include recording monitoring data on field sheets, which will be kept as part of Project documentation.

- **Soil Monitoring:** Soils impacted by VOCs or TPH that are encountered during site redevelopment will be characterized and documented. The monitoring and sampling activities to be performed include:
 - Visual observation performed to detect areas of soil that may be impacted by TPH or other non-VOC hazardous materials, if encountered.
 - Screening for VOCs using field instruments to document new or previously undetected sources of VOCs.
 - Soil sampling and chemical testing performed to evaluate concentrations of VOCs and TPH.
- **Proper Soil Handling:** If impacted soil is encountered, the area will be delineated as necessary with cones, caution tape, stakes, chalk, or flagging, and the area will not be disturbed further until an environmental professional is onsite for observation and determination of whether testing and/or excavation work is required. Stockpile staging areas will be delineated prior to the start of excavation. All excavations will conform to applicable regulations, including Cal/OSHA Construction Safety Orders. The specific equipment, means, and methods to be utilized for soil removal, handling, and disposition will be selected based on the nature of the work to be conducted and its location on the site. If excavation is conducted during the rainy season (October through April), provisions will need to be made to prevent offsite migration of sediment in runoff.
- **Fugitive Dust and Vapor Control:** Appropriate procedures will be implemented to control the generation of airborne dust by soil removal activities, including, but not limited to, the use of water as a dust suppressant or stopping activities that have the potential to generate fugitive dust in the event wind conditions change creating an uncontrollable condition.
- **Excavation and Stockpiling:** Impacted soil that is excavated and not immediately removed from the site will be stockpiled onsite and covered with plastic sheeting to control dust and minimize exposure to precipitation and wind. If a stockpile remains onsite during the

rainy season, a perimeter sediment barrier, constructed of material, such as straw bales or fiber roll, will also be installed. The stockpiles will be inspected biweekly at a minimum. During stockpile removal, only the working face of the stockpile will be uncovered. If the stockpiled impacted soil is to be transported offsite for disposal or recycling, the soil will be profiled for waste characteristics. Soil samples will be analyzed for parameters required by the disposal/recycling facility.

- **Responding to Unknown Conditions:** If previously unknown impacted soil is suspected (based on visual staining, odors, photo ionization detector readings, or other observations), the area will be delineated and construction activity will cease in this area, and sampling of the unknown material will occur using USEPA methodology. Analysis will be conducted for TPH, metals, and/or VOCs, as appropriate. Analytical results will be compared to applicable regulatory screening levels. Based on this comparison, a determination will be made regarding soil disposition (reuse on-site, off-site transport, and disposal/recycling, etc.). Additionally, if any UST or other subsurface features are encountered, a similar approach will be taken, and appropriate permitting, as necessary, will be obtained for the removal of the feature(s). Any permitted removals will be conducted with appropriate regulatory oversight, documentation, and reporting.
- **Imported fill:** As appropriate, offsite soils brought to the site for use as backfill (import fill), if necessary, will be tested in general conformance with the DTSC Information Advisory Clean Imported Fill Material document.
- **Post-construction Requirements:** If contaminated soil is left in place, the location of this soil will be surveyed or recorded by use of geographic positioning system equipment. Following the completion of construction, excavation, and disposition activities, a summary report will be prepared. The report will include a summary of activities, locations of soil sources and final disposition of contaminated soil, and estimated quantities of materials. Additionally, removal of any USTs or other subsurface features, if encountered, will be conducted under appropriate permits (if any) and documented in applicable reports for submittal to the LAFD, or other regulatory agency, as appropriate.

HAZ-PDF-2: The proposed Project will include installation of a vapor intrusion mitigation system (VIMS). The VIMS will be installed beneath the proposed building during construction to protect it from any potential for vapor intrusion. Additionally, a passive venting system will be installed as an additional protective measure, above and beyond any necessary measures. The passive venting system will allow potential vapors beneath the structure to be conveyed through piping to various points outside of the building. The passive venting system will have the potential to be turned into an active system, should it ever be deemed necessary during the lifetime of the structure.

d. Analysis of Project Impacts

Threshold (a): Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

(1) Impact Analysis

a. Construction

(i) General Construction Hazardous Materials and Waste

Project-related construction activities would involve the routine use of hazardous materials, such as fuels, lubricants, and greases in construction equipment and coatings used in construction, during all construction phases.

These materials would not be in such quantities or stored in such a manner as to pose a significant safety hazard to onsite construction workers or the general public. Construction activities would also be short-term or one time in nature and would cease upon completion of the proposed Project's construction phase. Project construction workers would also be trained in safe handling and hazardous materials use per HAZWOPER regulations. Additionally, the use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations including the USDOT regulations listed in the CFR (Title 49, Hazardous Materials Transportation Act); Caltrans standards; and the Cal/OSHA standards. Any Project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the RCRA (CFR, Title 40, Part 263). The proposed Project would also be constructed in accordance with the regulations of LAFD, which serves as the designated CUPA.

With the implementation of regulatory requirements, the risk of exposure to workers and the public associated with the routine use of hazardous materials would be less than significant.

(ii) **Underground Storage Tanks**

The proposed site includes one 10,000-gallon kerosene-based wash thinner UST that was abandoned in place. Additionally, review of historical information could not definitively account for the removal of two other USTs on the Virco portion of the Project Site. Since these USTs were used for storage of hazardous materials, they could pose a health risk to construction workers during handling, transport, and disposal. If any of the USTs on the Project Site are encountered during grading activities, the SMP (see Project Design Feature HAZ-PDF-1) will be in effect, and removal of any UST and handling of any potentially impacted soil would be conducted in accordance with the SMP. The UST would be appropriately permitted with the LAFD for removal and subsequent removal and sampling activities would be conducted with LAFD oversight, followed by generation of the appropriate removal and closure reports. Furthermore, any UST removals will be conducted in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations).

With the implementation of regulatory requirements and the SMP (Project Design Feature HAZ-PDF-1), the risk of exposure to workers and the public associated with UST removal would be less than significant.

(iii) **Impacted Soils**

Construction activities required to develop the Project Site would involve the disturbance of onsite soils. There is the potential for the discovery of contamination during these activities since the Project Site has had a long history with extensive chemical use associated with manufacturing facilities, including several known or suspected chemical releases and past remediation efforts. Most of these known or suspected releases have been investigated and, as necessary, remediated to the satisfaction of the LAFD and the LARWQCB. However, the Phase I ESA did identify RECs onsite. Further investigation into the RECs, as detailed in the Phase II report, concluded that TPH was present in some soil samples above the screening limits. However, none of the samples were deeper than 2 feet bgs, indicating that the TPH contamination is limited to shallow soils. Furthermore, the concentrations of all VOCs detected were well below their corresponding screening levels for soils for commercial/industrial sites. Contaminated soils encountered during construction could pose a health risk to workers and the general public during removal, handling, and transport. However, contaminated soils would be removed and disposed of offsite in accordance with all applicable regulatory guidelines, including, but not limited to, South Coast AQMD Rule 1166 and Rules 402 and 403.:

Furthermore, a SMP (Project Design Feature HAZ-PDF-1; Appendix F3) was prepared for the proposed Project. The SMP identifies requirements intended to protect human health when soil in certain areas of known or suspected areas are disturbed for any reason, including, without limitation, as a result of demolition, utility installation/repair, soil excavation, drilling, grading/filling activities, stockpile generation, soil management, loading, and transportation. Requirements of the SMP include protocols for the HASP, environmental monitoring, proper soil handling (if impacted soil is encountered), fugitive dust and vapor control, excavation and stockpiling, soil monitoring, soil monitoring, responding to unknown conditions, imported fill, and post-construction requirements.

With the implementation of regulatory requirements and Project Design Feature HAZ-PDF-1, the risk of exposure of hazardous materials to the workers and the public through the routine transport, use, or disposal of contaminated or potentially contaminated soils would be less than significant.

(iv) Impacted Concrete

As determined in the Phase II Investigation, the concrete core samples indicated that hydrocarbons have penetrated the concrete in areas with visual stains. Eight concrete cores were collected from six locations with oily surface staining and were analyzed for TPH and PCBs. TPH was found in all of the concrete cores analyzed, and PCB was found in only one concrete core.

TPH as gasoline and light hydrocarbons (TPH-g [carbon-chain range C4-C12]) was detected in seven concrete core samples at concentrations ranging from 0.29 to 2.57 mg/kg (below the screening level of 500 mg/kg). TPH as diesel (TPH-d [carbon-chain range C13-C22]) was detected in eight concrete core samples at concentrations ranging from 122 to 11,400 mg/kg (three of which were above the screening limit of 1,000 mg/kg). Heavy oil-range TPH (TPH-o [carbon-chain range C23-C40]) was detected in eight concrete core samples at concentrations ranging from 55.9 to 17,500 mg/kg (two of which were detected above the screening limit of 10,000 mg/kg). TPH-d and TPH-o were not detected above the reporting limit from samples deeper than 2 feet bgs, indicating they are limited to shallow soils.

PCB was detected at a concentration of 0.217 mg/kg, below its residential screening level of 0.24 mg/kg. Therefore, PCBs do not appear to represent a risk to human health for both residential and industrial/commercial exposure scenarios and would not be a concern to a regulatory agency. To be conservative, this Draft EIR assumed that 1,000 tons of stained concrete would be hauled off and reprocessed or disposed of offsite. Handling and disposal of stained concrete would occur in accordance with all applicable regulatory agencies and the SMP (Project Design Feature HAZ-PDF-1) to ensure worker and public safety from TPH.

With the implementation of regulatory requirements and Project Design Feature HAZ-PDF-1, the risk of exposure of hazardous materials to the workers and the public through the routine transport, use, or disposal of contaminated or potentially contaminated soils and concrete would be less than significant.

b. Operation

(i) Hazards from Proposed Uses

Operation of the proposed Project may involve the use of small amounts of hazardous materials, such as industrial cleansers, greases, and oils for cleaning and maintenance purposes, common to all urban developments. The operational phase may also involve transport, use, and disposal of hazardous materials; however, the precise materials are not known, as the tenants of the proposed warehouses are not yet defined. In the event that hazardous materials, other than those common materials described above, are associated with future warehouse operations, the hazardous materials would only be stored and transported to and from the building site.

Manufacturing, involving large amounts of hazardous materials, and other chemical processing would not occur within the proposed warehouse uses.

The use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the USEPA, USDOT, Cal/OSHA, and LAFD.

With the implementation of applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would reduce impacts to less than significant.

(ii) Hazards from Existing and Previous Uses

Previous investigations on the Project Site have shown residual concentrations of TPH and VOCs in soil and soil vapor. As stated, impacted soil will be managed in accordance with an SMP (Project Design Feature HAZ-PDF-1) that will be in effect during redevelopment activities. Additionally, VOC concentrations in groundwater, both beneath the former Electriccord site and downgradient of the Project Site, exceed regulatory screening levels.

As a result of residual VOCs in the subsurface, the proposed construction will include installation of a vapor intrusion mitigation system (VIMS; Project Design Feature HAZ-PDF-2). The VIMS will be installed beneath the proposed building during construction to protect it from any potential for vapor intrusion. This design feature has been used at many sites where VOCs are present in the subsurface to allow for both commercial and residential use scenarios. Additionally, a passive venting system will be installed as an additional protective measure, above and beyond any necessary measures. With installation of the VIMS, contaminated groundwater would not pose any health risks for future employees at the Project Site; as such, impacts would be less than significant.

With the implementation of regulatory requirements and Project Design Feature HAZ-PDF-2, the risk of exposure of hazardous materials to the workers and the public through due to existing and previous uses on the Project Site would be less than significant.

(2) Mitigation Measures

Impacts regarding the routine transport, use, disposal, or accidental release of hazardous materials during Project construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the routine transport, use, disposal, or accidental release of hazardous materials during Project construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

(1) Impact Analysis

a. Construction

The proposed Project would comply with the requirements of applicable laws and regulations governing upset conditions and accidents, including the requirements of the hazardous materials disclosure program, CalARP, and the hazardous materials release response plans and inventory program, Health and Safety Code § 25500. Additionally, strict adherence to all emergency response plan requirements set forth by LAFD would be required through the duration of the Project construction phase.

These requirements would ensure that all potentially hazardous materials and impacted soils are handled in an appropriate manner and would minimize the potential for upset and accident conditions. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Therefore, this impact is considered less than significant.

With the implementation of regulatory requirements impacts to the public or the environment through foreseeable upset and accident conditions involving hazardous materials during the construction phase would be less than significant.

b. Operation

Regulatory requirements pertaining to upset conditions and accidents following during the construction phase would also be implemented during the operational phase. For the operational phase, both the federal government and the State of California require that the proposed Project submit a hazardous materials business plan to LAFD. These requirements would ensure that all potentially hazardous materials are handled in an appropriate manner and would minimize the potential for safety impacts, and impacts are considered less than significant.

With the implementation of regulatory requirements impacts to the public or the environment through foreseeable upset and accident conditions involving hazardous materials during the operation phase would be less than significant.

(2) Mitigation Measures

Impacts involving the release of hazardous materials into the environment during upset and accident conditions during Project construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts involving the release of hazardous materials into the environment during upset and accident conditions during Project construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

(1) Impact Analysis

a. Construction

Amestoy Elementary School is located approximately 0.14 miles northwest of the site. The use of hazardous materials onsite during the Project's construction phase and the transport of contaminated soil could pose a hazard to the school site. **However, as stated previously, the use of these hazardous materials and the transportation of contaminated soil would be required to comply with the SMP and regulatory requirements. Additionally, these activities would be short term or one time in nature and would cease upon completion of the proposed Project. Therefore, impacts of the construction phase on the nearby school would be less than significant.**

b. Operation

As substantiated under Threshold (a) above, the operation of the proposed Project may involve the use of small amounts of hazardous materials. The operational phase may also involve transport, use, and disposal of hazardous materials. **The use, storage, transport, and disposal of hazardous materials would be governed by existing regulations. Therefore, impacts of the operational phase on the nearby school would be less than significant.**

(2) Mitigation Measures

Impacts during Project construction and operation regarding hazardous emissions or use of acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts during Project construction and operation regarding hazardous emissions or use of acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): *Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?*

(1) Impact Analysis

The Project Site includes the remains of two former manufacturing facilities—Virco on the western half and Electriccord and Leviton on the eastern half of the Project Site. A former Arco gas station was located at the southwestern corner of the Project Site from at least the mid-1950s to 1989 when a total of seven USTs and associated dispensers and piping were removed. LARWQCB issued closure for the former Arco gas station in a letter dated December 31, 2012. The Virco site was identified on the GeoTracker database as a Cleanup Program Site. Based on the results of previous investigations and remediation, the LARWQCB issued a “No Further Action” determination for the Virco Cleanup Program case on September 13, 2011. A total of approximately 750 tons of metals-impacted soil and 333 tons of petroleum hydrocarbon-impacted soil were excavated and removed from the former Virco portion of the Project Site. HHRAs conducted in 2009 and 2010 to evaluate risks from VOCs in soil vapor reported that there was low vapor intrusion risk to human health (less than 1×10^{-6} cancer risk) under a residential scenario. OEHHA reviewed the HHRAs and concurred with the finding. However, as discussed above, the Phase II Investigation identified tetrachloroethene (PCE) in 5-foot soil vapor samples at concentrations up to 21 µg/l.

The former Electriccord area (eastern half of the Project Site) is currently an active Cleanup Program Site overseen by the LARWQCB (Global ID SL0603729001). Six groundwater monitoring wells exist on the Electriccord portion of the Project Site (along with two off-site wells) that are currently monitored on a semiannual basis. A workplan to install additional soil vapor and groundwater monitoring wells has been approved by the LARWQCB and is planned for the near future.

Grading and construction activities would not affect existing groundwater contamination. Construction would not affect groundwater remediation or monitoring, which occurs at depths over 30 feet below the surface. For operational uses, the proposed Project will include installation of a VIMS (Project Design Feature HAZ-PDF-2), as a result of residual VOCs in the subsurface. The VIMS will be installed beneath the proposed building to protect it from any potential for vapor intrusion. This design feature has been used at many sites where VOCs are present in the subsurface to allow for both commercial and residential use scenarios. Additionally, a passive venting system will be installed as an additional protective measure, above and beyond any necessary measures. With installation of the VIMS, contaminated groundwater would not pose any health risk to future employees at the Project Site; impacts are less than significant.

With the implementation of regulatory requirements and Project Design Feature HAZ-PDF-2, the risk of exposure of hazardous materials due to the Project Site being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant.

(2) Mitigation Measures

Impacts related to the Project's location on a hazardous materials site were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to the Project's location on a hazardous materials site were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (e): For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?

As discussed in Chapter VI (Subsection Impacts Found not to be Significant) and in the Initial Study (Appendix A), the Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. **As a result, implementation of the Project would not result in a safety hazard or excessive noise to people residing or working in the Project Site. No impact would occur with respect to Threshold (e), and no further analysis is required.**

Threshold (f): Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

As discussed in Chapter VI (Subsection Impacts Found not to be Significant) and in the Initial Study (Appendix A), the Project Site is located approximately 0.13 miles west of Interstate 110 (Harbor Freeway, the nearest designated Disaster Route). The Project would not require the closure of any public or private streets during construction or operation and would not impede emergency vehicle access to the Project Site or surrounding area. Additionally, emergency access to and from the Project Site would be provided in accordance with requirements of the LAFD. **As a result, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur with respect to Threshold (f), and no further analysis is required.**

Threshold (g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As discussed in Chapter VI (Subsection Impacts Found not to be Significant) and in the Initial Study (Appendix A), the Project Site is in a highly urbanized, built-out portion of the City and is outside of the Very High Fire Hazard Severity Zone designated by the California Department of Forestry and Fire Protection. **As a result, future development under the Project would not**

pose wildfire-related hazards to people or structures. No impact would occur with respect to Threshold (g), and no further analysis is required.

e. Cumulative Impacts

(1) Impact Analysis

The area considered for cumulative impacts is the City of Los Angeles and related projects. Hazards and hazardous waste impacts are typically unique to each site and do not usually contribute to cumulative impacts. Cumulative development projects would be required to assess potential hazardous materials impacts on the development site prior to grading. The Project and other cumulative projects would be required to comply with laws and regulations governing hazardous materials and hazardous waters used and generated as described in Section IV.G.2. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant after regulatory compliance.

(2) Mitigation Measures

Cumulative impacts related to hazards and hazardous materials would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to hazards and hazardous materials would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and impacts remain less than significant.