

Appendix FEIR-3

Draft Soil and Site Management Plan

1111 SUNSET BOULEVARD PROJECT

SOIL AND SITE MANAGEMENT PLAN

PREPARED FOR: 1111 Sunset Boulevard, LLC

PREPARED BY:



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Acronyms and Abbreviations

ASTM	American Society for Testing and Materials International
BMPs	Best Management Practices
CAL EPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CAL OSHA	California Occupational Safety and Health
CCR	Administration California Code of Regulations
CFR	Code of Federal Regulations
COCs	constituents of concern
DBS	Department of Building and Safety
DEIR	Draft Environmental Impact Report
DTSC	Department of Toxic Substances Control Environmental
EM	Monitor
feet bgs	feet below ground surface
HASP	Health and Safety Plan
HMS	Hazardous Materials Specialist
LEI	Lead Environmental Inspector
MM	Mitigation Measure
MS4	Municipal Separate Storm Sewer System
MVA	Million-volt amperes
OSHA	Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PE	Petroleum Engineer
PID	photoionization detector
Plan	Soil and Site Management Plan
PM	Project Manager
PPE	personal protection equipment
ppm	parts per million
Project	1111 Sunset Boulevard Project
QSP	Qualified SWPPP Practitioner
RCRA	Resource Conservation and Recovery Act
STLC	Soluble Threshold Limit Concentration

Acronyms and Abbreviations (continued)

SVOCs	Semi-Volatile Organic Compounds
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCLP	Toxicity Characteristic Leaching Procedure
TPH	total petroleum hydrocarbons
TTLc	Total Threshold Limit Concentration
USEPA	United States Environmental Protection Agency
VOCs	Volatile Organic Compounds
WEAP	Worker Environmental Awareness Program

1. Introduction and Project Description

This Soil and Site Management Plan (Plan) was prepared for 1111 Sunset Boulevard, LLC (Sunset Boulevard, LLC) and provides planned measures to be implemented by Sunset Boulevard, LLC and/or its construction contractors (contractors) to address the appropriate storage, handling, cleanup, disposal, and transportation of soil in accordance with relevant and applicable federal, state, and local regulations during construction of the 1111 Sunset Boulevard Project (Project). This Plan also describes how Sunset Boulevard, LLC and/or its contractors can handle potential environmental contamination, if encountered during construction. This Plan was prepared in accordance with, and to satisfy the preconstruction requirements of Mitigation Measure (MM) HAZ-MM-3 and as described in the Project's Draft Environmental Impact Report (DEIR) prepared by Eyestone Environmental, LLC (Eyestone, 2021). In addition, the Plan addresses compliance with California Code of Regulations (CCR Title 22, Chapter 11, Article 3, Section 66261) and related relevant requirements. This Plan applies to aspects of the Project related to construction components, demolition activities and staging areas, throughout the construction period.

The Project involves a new mixed-use development proposed on an approximate 273,000 square foot (6.3 acre) site consisting of proposed residential units, hotel rooms, commercial space, and a general commercial floor area. Proposed uses would be constructed above a screened six-level parking podium located within four primary structures. Primary structures include two residential towers (referred to Tower A and Tower B), a hotel/residential tower (referred to as the Sunset Building), and a commercial building that may contain office, retail, restaurant, and parking uses (referred to as the Courtyard Building). Implementation of the Project would require the removal of existing vacant buildings within the Project site. A comparison of the two development scenarios are as follows:

- **Mixed Use Development Scenario** – Includes construction of up to 737 residential units (including up to 76 restricted affordable housing units), 180 hotel rooms, 48,000 square feet of office space, and 95,000 square feet of general commercial floor area;
- **No-Hotel Development Scenario** – Includes a maximum of up to 827 residential units (including up to 76 restricted affordable housing units), up to 48,000 square feet of office space, and 95,000 square feet of general commercial floor area.

2. Objectives

In general, this Plan is intended to provide Sunset Boulevard, LLC and its contractors performing grading and soil excavation with a description of measures that will be implemented to properly manage suspected or known contamination of soil or groundwater encountered during construction of the Project. This Plan also provides information on recommended sampling, analytical testing, and appropriate response measures for situations that may arise in association with management of environmental contamination during grading, excavation, and demolition activities (hereinafter grading, excavation, and demolition will collectively be referred to as “construction”).

The Plan provides specific information for implementing HAZ-MM-3, as well as the means of monitoring the effectiveness of the Plan through application of control measures during Project construction. The management practices and techniques presented in this Plan are intended to accomplish the following objectives:

- Provide for the proper monitoring, sampling, and testing of suspected or known contaminated soil encountered during construction of the Project.
- Provide for the measures for proper handling, storage, transportation, and disposal of contaminated soil encountered during construction of the Project.
- Provide specific soil stockpiling procedures and measures for containment to prevent run on and run off.
- Provide guidelines for the identification and assessment of suspected environmental contamination including notification procedures and field guidelines.
- Provide guidelines on sampling procedures to comply with the intended disposal methods for soil generated during construction.
- Provide guidance on the identified approved disposal sites.

3. Applicable Mitigation Measure

The full text of the MM that is addressed in this Plan is provided for reference below:

HAZ-MM-3: A soil and site management plan will be developed and implemented to ensure all on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility and to address the potential identification and abandonment of oil wells if encountered during earthwork activities.

- The soil management plan shall be submitted to the City of Los Angeles Department of Building and Safety (DBS) for review and approval prior to the commencement of excavation and grading activities.
- As part of the soil management plan, a licensed Petroleum Engineer, and/or his/her designee, in his or her reasonable discretion, shall be present on the Project Site during grading and excavation activities in the potential locations of the well and shall be on call at other times to monitor compliance with the soil and site management plan.

4. Field Guidelines for Construction Activities

The following subsections provide details on the response, reporting and notification procedures that will be implemented in the event of an unanticipated discovery of contaminated soil and to address the potential identification and abandonment of oil wells encountered during Project construction activities. Continuous monitoring of construction activities for preliminary indications of environmental contamination will be performed by Sunset Boulevard, LLC's contractors or related Project Personnel (i.e., first responder), prior to notification to an onsite Geosyntec Consultants (Geosyntec) Environmental Monitor (EM), for confirmation evaluation. Each EM will be a qualified professional, experienced in field screening/evaluation of impacted soil. The EM will be responsible for evaluation of suspected contaminated media, field screen materials for visual and/or olfactory indications of the presence of contaminants, and collect environmental samples for laboratory analysis, if deemed warranted. Continuous monitoring will also be performed by a licensed Petroleum Engineer and/or his/her designee (hereinafter a licensed Petroleum Engineer and/or his/her designee will collectively be referred to as "PE") during construction activities in the suspected oil well locations and be on call at other times to monitor compliance with this Plan

4.1 Unanticipated Discovery of Suspected Contaminated Soil

In the event of a discovery of potentially contaminated soil during Project construction, the following response procedures will be implemented immediately. Should the suspected contaminated materials pose an imminent threat or impact human health or the environment, release reporting and notification procedures described in Section 4.2, *Notification Procedures*, will be followed.

- Once discovery of potentially contaminated soil has been made and it is safe to do so, Project personnel (i.e., first responder) will stop work in the area as needed and contain the area to assess the extent of contamination and prevent dispersion of contaminated material around the work zone.
- Sorbent and barrier materials will be utilized to prevent runoff from potentially contaminated areas and limit the spread of contamination.
- The area will be marked and secured using signing, flagging, fencing, cones, or similar devices to prevent exposure of personnel to the area and minimize the spread of contamination.
- The EM and/or Lead Environmental Inspector (LEI) will then be contacted by the first responder to inform the next steps for evaluation and compliance with the Plan.
- The EM or LEI will contact the Sunset Boulevard, LLC Project Manager (PM) and/or designated Geosyntec Hazardous Materials Specialist (HMS), as needed, to notify them of the discovery.

- The EM or LEI will determine next steps to properly sample, contain, clean up, store, and dispose of the material as described in this Plan.
- Should the discovery occur during active trenching or excavation, appropriate steps will be taken to properly evaluate the extent of contamination (using visual and olfactory indicators, or field screening), to determine if work in the immediate area can proceed.
- Excavated soil that is suspected to be contaminated will be segregated from clean material, placed on visqueen (or equivalent), bermed and covered pending coordination of containment in drums or covered roll-off bins for transportation to a Project storage area or to an appropriate disposal facility.
- Once containerized, contaminated materials will be brought to a Project storage area, containers will be properly placarded, signed and marked "Pending Characterization." Placarding will also include information related to the contents of the containers, generator information, and date the waste was generated and emergency contact information.
- Soils suspected of contamination will be sampled and characterized to determine proper disposal or reuse alternatives.
- In the event Project personnel become exposed to suspected hazardous materials, proper decontamination procedures, first aid, or medical response will be performed. Based on the typical hazardous materials that may be encountered during construction, this generally requires the use of washing (e.g., eye flush or hand washing). If the exposed individual believes they need immediate medical treatment, local emergency services (i.e., dial 911) will be contacted or the individual will report to a nearby medical facility for treatment.

4.2 Discovery of Potential Oil Wells

In the event of a discovery of a potential oil well during Project construction, the following procedures will be implemented immediately and also in compliance with MM HAZ-MM-1 and HAZ-MM-2. Should the suspected oil well pose an imminent threat or impact human health, or the environment, reporting and notification procedures described in Section 4.3, *Notification Procedures*, will be followed.

- Once discovery of a potential oil well has been made and it is safe to do so, Project personnel (i.e., first responder) will stop and/or limit work in the area as needed and to assess the oil well.
- The area will be marked and secured using signing, flagging, fencing, cones, or similar devices to prevent damage to the oil well.
- The PE, EM, and/or LEI will then be contacted by the first responder to inform the next steps for evaluation and compliance with the Plan.
- The PE, EM, and/or LEI will contact the Sunset Boulevard, LLC PM and/or designated Geosyntec HMS, as needed, to notify them of the discovery.
- The PE or PM will contact the California Geologic Management Division (CalGEM) in accordance with CalGEM notification protocols (CalGEM, 2020a) to assess the condition of

the encountered well and prescribe leak testing and abandonment procedures in compliance with current CalGEM standards (CalGEM, 2020b).

- Steps for implementing and performing oil well leak testing and abandonment procedures will be determined in collaboration with appropriate CalGEM personnel.

4.3 Notification Procedures

In the event that impacted soil and/or oil wells are encountered or suspected, the EM, PE, and/or first responder will notify the LEI, HMS, onsite Foreman, and instruct site workers to halt construction activities. For suspected impacted soil, site workers will be instructed to segregate impacted and unimpacted materials and coordinate the mobilization of required equipment to remove and store contaminated materials, if warranted. In the event that oil wells are encountered the PE will notify the PM and CalGEM personnel. Additionally, during routine safety meetings, site workers will be briefed on the potential to encounter impacted soil and/or oil wells and will be instructed to notify the EM, LEI, PE, or onsite Foreman if suspected. Contact information for the Project's designated personnel are provided in Appendix A, *Project Contact List*.

5. Plan Implementation

5.1 Training and Safety Requirements

All personnel working on the Project will be required to attend the Worker Environmental Awareness Training Program (WEAP), which will include training on known and potential environmental contamination as well as potential oil wells that may be encountered during construction, proper management of impacted soil and response measures, relevant Project plans, and the Storm Water Pollution Prevention Plan (SWPPP), as applicable. This will include information procedures for identifying the types of contamination (e.g., volatile organic compounds [VOCs], petroleum hydrocarbons and metals) that may be encountered during construction activities.

Appropriate health and safety precautions will be implemented to protect employees and the public to prevent or minimize exposure to potentially contaminated materials. Work shall be performed in accordance with California Occupational Safety and Health Administration (Cal OSHA) standards. Proper personal protection equipment (PPE) will be utilized by all Sunset Boulevard, LLC and contractor personnel who may encounter contaminated soil in compliance with Cal OSHA standards. Appropriate PPE, first aid, and emergency supplies will be available to contractor personnel at hazardous material and waste storage areas, which may include Project staging areas, active work sites and on construction vehicles or equipment. Specialized contractors responsible for management and disposal of impacted soil will be responsible for maintaining the minimum PPE requirements and first aid resources and be prepared to escalate PPE levels on an as-needed basis.

In addition, a project-specific Health and Safety Plan (HASP) will be prepared and the Primary Construction Contractor(s) will prepare and implement a Health and Safety program for the Project. Daily Tailgate meetings will be conducted throughout construction and will address the daily on ongoing safety concerns and required mitigation(s). The EM, PE, LEI, contractors, and other onsite personnel will participate in the Daily Tailgate meetings as needed, and issues pertaining to contaminated soils or oil wells will be discussed where appropriate. Personnel responsible for managing contaminated materials will be trained in proper handling, storage, and transportation requirements, as well as appropriate emergency response procedures in accordance with local, state and federal regulations.

5.2 Soil Management

This section describes the measures that will be taken during construction of the Project to address the proper procedures for the monitoring, testing, storage, management, transportation and disposal of contaminated soil in accordance with Project mitigation measures and permit conditions, as well as applicable state and federal regulations (CCR Title 22 Sections 66261.1–66261.7, Title 24; Part 9, and 40 CFR 260, et seq.).

5.2.1 Monitoring for Impacted Soil

Visual Monitoring and Field Screening

Construction contractors will continuously monitor soil conditions during excavation/trenching activities. Visual identification of impacted soil will be based on the presence of staining or discoloration and olfactory indicators (odorous soil) will be utilized as preliminary indications of potential impacts. Following identification of potentially impacted soil, the construction contractor will halt excavation activities, segregate and cover all excavated materials suspected of contamination, and immediately notify the onsite EM or LEI to facilitate confirmation screening.

Upon preliminary confirmation of the presence of impacted soil by the EM or LEI, the PM and Sunset Boulevard, LLC HMS will be notified. Following notification to the PM and HMS and in addition to visual monitoring, a properly calibrated photoionization detector (PID) will be used by the EM or LEI to screen excavated soils in the field to support identification and delineation of impacts within the work zone. Field screening of soil samples for contamination will be conducted using a PID and the head-space screening method, as follows:

- Approximately 2 to 4 ounces of soil will be placed in a sealed plastic bag, shaken gently, and allowed to equilibrate for approximately 3 minutes.
- Following equilibration, the PID probe tip will be inserted into the bag to collect a headspace reading. The screening level for considering soil to be impacted is 50 parts per million (ppm) as measured by a PID calibrated to isobutylene at a concentration of 100 ppm.
- Soil identified with visual or olfactory indications of contamination, or PID readings exceeding 50 ppm will be considered impacted and segregated from unimpacted material for future characterization and transportation for disposal.

The identification and segregation of soil potentially impacted by other contaminants which cannot be determined with the PID will be done at the discretion of the onsite EM. Monitoring observations and the results from soil screening with the PID will be recorded in a field notebook. The location(s) where impacted soils were identified, estimated volumes of impacted soil excavated, soil staging location, and project personnel notified of the conditions will also be documented.

5.2.2 Displaced Soil Management

Unimpacted excavated soils will be stockpiled or containerized and staged at a secure location within the project site or at a project staging area pending reuse or offsite disposal. Excavated material suspected or confirmed to be impacted soil will be segregated from unimpacted material, stockpiled (temporarily) or containerized (and covered), and stored at a project staging area, pending characterization. All stockpiled materials are required to implement the specific soil stockpiling requirements described in Section 5.4. Procedures for characterization and disposal of impacted soil is described in the following subsections.

5.2.3 Soil Sampling

Prior to disposal or reuse, stockpiled and/or containerized soils will be sampled and analyzed in accordance with this Plan. Excavated soil that is designated for disposal to a permitted hazardous waste or specified waste facility, or to a treatment/recycling facility, must also be sampled and analyzed in accordance with the receiving facility's requirements. If reuse of excavated soils is proposed, analytical results will be compared to applicable conservative screening levels, including USEPA - Regional IX - Regional Screening Levels for Residential Soils (RSLs) [USEPA, 2021], California Department of Toxic Substances Control (DTSC) Modified Screening Levels (residential) [DTSC, 2020], to confirm that soils are appropriate for reuse.

Common soil contaminants may include, but not limited to metals, total petroleum hydrocarbons (TPH), polychlorinated biphenyls (PCBs), semi-volatile organic compounds (SVOCs) and volatile organic compounds (VOCs). Based on the field screening described in Section 5.2.1, the onsite EM will evaluate the potential constituents of concern (COCs), collect an appropriate number of soil samples (based on the soil volume) and submit them for laboratory analysis. The EM will also document the location and contents and of stockpiled and containerized soils, track the waste generation and storage retention times for compliance with small quantity or large-quantity generator storage requirements and assist Sunset Boulevard, LLC with coordinating proper waste disposal.

Characterization samples will be collected and analyzed utilizing industry standard testing methods (e.g., United States Environmental Protection Agency [USEPA] or American Society for Testing and Materials International [ASTM] Methods). Based on historical activities within the site area and previous analytical results of soil samples collected for the Project (ADR, 2015), potential sources of contamination at the Project site, the suite of analysis to characterize soil for offsite disposal will include (at a minimum) the following COCs listed in Table 1 on the following page. The COC, analytical methods, preservation, and hold times are also provided.

Table 1: Soil Analytical Suite

CONSTITUENT OF CONCERN	ANALYTICAL METHOD	PRESERVATIVE	SAMPLE CONTAINER	HOLD TIME
Ignitability	EPA Method 1030	4-deg. C	4 oz glass jar w/ Teflon lid	14 days
pH (Corrosivity)	EPA Method 9045D	4-deg. C	4 oz glass jar w/ Teflon lid	24 hours
TPH – extended range (C10-C44)	EPA Method 8015B (M)	4-deg. C	4 oz glass jar w/ Teflon lid	14 days ¹
Title 22 Metals/Mercury (total)	EPA Method 6010B/7471A	None	4 oz glass jar w/ Teflon lid	180 days / 28 days
PCBs	EPA Method 8082A	4-deg. C	4 oz glass jar w/ Teflon lid	14 days ¹
SVOCs	EPA Method 8270-PAH SIM	4-deg. C	4 oz glass jar w/ Teflon lid	14 days ¹
VOCs + Oxygenates	EPA Method 8260B	4-deg. C	4 oz glass jar w/ Teflon lid	14 days
1 – Day for extraction, 40-day hold time following laboratory extraction.				

Following receipt and evaluation of preliminary results, supplemental testing may be required to satisfy disposal facility-specific acceptance criteria, or to further evaluate the hazardous nature of these materials.

5.2.4 Waste Characterization

Laboratory analytical results for soil samples will be compared to hazardous waste criteria in accordance with federal and state regulations (40 CFR Parts 261 and 22 CCR Division 4.5, Chapter 11, Article 3, §66261.24). Wastes may be classified as non-hazardous, non-Resource Conservation and Recovery Act (RCRA) or RCRA hazardous waste based on the following:

- Should concentrations for any given parameter exceed their respective Total Threshold Limit Concentration (TTLC; where established), then the soil is considered non-RCRA (California) hazardous waste.
- Soluble Threshold Limit Concentration (STLC) analysis is required if the TTLC result equals or exceeds STLC by a factor of 10 or more. If the STLC result is equal to or greater than the STLC limit, then the waste considered California (non-RCRA) hazardous waste.
- Toxicity Characteristic Leaching Procedure (TCLP) testing is required for federal hazardous waste characterization if the TTLC result equals or exceeds the TCLP thresholds (where established) by a factor of 20 or more. If the TCLP result is equal to or greater than the TCLP limit, then the waste is considered a federal (RCRA) hazardous waste.

Where established, regulatory threshold limits for common metals and volatile organic contaminants are presented in Table 2 and 3, respectively. A complete list of regulatory threshold limits for various COCs are provided in California Code of Regulations (CCR), Title 22 (State of California, 2020).

Table 2: Metals Regulatory Limits

PARAMETER	TTLIC LIMIT (mg/kg)	STLC LIMIT (mg/L)	TCLP LIMIT (mg/L)
Arsenic	500	5.0	5
Barium	10,000	100	100
Cadmium	100	1	1
Chromium	2,500	5	5
Lead	1,000	5	5
Mercury	20	0.2	0.2
Selenium	100	1	1
Silver	500	5	5

Notes:

mg/kg – milligrams per kilogram

mg/L – milligrams per liter

Table 3: Volatile Organics Regulatory Limits

PARAMETER	TTLIC LIMIT (mg/kg)	STLC LIMIT (mg/L)	TCLP LIMIT (mg/L)
Benzene	NE	NE	0.5
Carbon Tetrachloride	NE	NE	0.5
Chlorobenzene	NE	NE	100.0
Chloroform	NE	NE	6.0
1,4-Dichlorobenzene	NE	NE	7.5
1,2-Dichloroethane	NE	NE	0.5
1,1-Dichloroethylene	NE	NE	0.7
Methyl ethyl ketone (MEK)	NE	NE	200.0
Tetrachloroethylene (PCE)	NE	NE	0.7
Trichloroethylene (TCE)	2,040	204	0.5
Vinyl chloride	NE	NE	0.2

Notes:

mg/kg – milligrams per kilogram

mg/L – milligrams per liter

NE – Not Established

5.3 Oil Well Management

Based on the findings from review of available records and desktop evaluation performed for the Project (Geosyntec, 2021), historical aerial photographs suggest that multiple oil derricks were situated primarily along the eastern and southern Project site boundaries, which may now be within the current road right of way (Figure 3). Removal of the oil derricks and evidence of disturbed ground and darker surface materials (potential hydrocarbon-stained soil) are visible in subsequent historical aerial photographs. Magnetic and electromagnetic geophysical surveys were performed to locate and/or confirm the locations of the potential oil wells; however, the geophysical surveys did not identify the location of potential oil wells on the area of the site surveyed (Geosyntec, 2021).

5.3.1 Monitoring for Oil Wells

In the event the oil wells are encountered during construction activities, evaluation and management of the wells will be performed in accordance with the following procedures:

- A licensed PE will be responsible for continuous monitoring during construction activities within the eastern and southern portions of the Project site to document the presence of an oil well and for preliminary evaluating the conditions of the encountered well.
- During construction activities outside the potential oil well locations, the PE will be on-call in the event an unexpected oil well or visual indications of a well is encountered.
- Visual indications of an oil well may include, but not limited to; a wooden box or circular metal casings; open circular holes in the graded surface; square or circular soil or other plugs of differing color, material, texture from the surrounding soil.
- Following identification of the encountered oil well, the PE will immediately instruct the construction contractor to halt work activities. The PE will evaluate the oil well, collect photo documentation of the well, and facilitate notifications to the PM and CalGEM.
- If an oil well or visual indications of oil well are encountered in areas outside the potential oil well locations the EM, LEI, or HMS will instruct the construction contractor to halt work activities. The EM, LEI, or HMS will immediately notify the on-call PE to facilitate visual inspection of the potential well and notifications to the PM and CalGEM, if needed.
- If the presence of an oil well is determined by the PE, CalGEM personnel will evaluate the existing conditions of the well and prescribe leak testing and abandonment procedures on a case-by-case basis.

5.4 Waste Staging and Disposal

5.4.1 Waste Storage

The storage and containment of contaminated materials will be conducted in compliance with the following requirements:

- Contaminated soil will be stored at temporary Project staging areas, within secondary containment, away from drainage areas, if possible.
- Soil stockpiles will be located away from surface waters as described in Section 5.4.2.
- Implementation of effective BMPs as described in Section 5.4.2.
- Work areas will be kept clean to minimize the potential for an inadvertent release.
- Incompatible materials will be stored in segregated areas. Materials that are incompatible will not be placed in the same tank/container or in an unwashed container that previously held such incompatible material.

5.4.2 Best Management Practices

BMPs will be implemented during construction activities to ensure that discharges do not enter the Municipal Separate Storm Sewer System (MS4) or any surface waters. Locations of soil stockpiles with known or suspected contaminated materials shall meet the following minimum general site conditions:

- Surface drainage shall be diverted away from the soil stockpiles and storage containers;
- Implementation of effective BMPs (e.g., fiber rolls, gravel bags, plastic sheeting) to prevent soil stockpiles from contacting surface water run-on, and the erosion and transport of stockpiled soil by surface water runoff;
- Soil stockpiles shall be located more than 100 feet from any surface waters of the State; and
- Soil stockpiles shall be protected against 100-year peak stream flows as defined by the local flood control agency.

Temporary BMPs (if needed) employed during Project construction activities will be in accordance with the Project's SWPPP.

5.4.3 Transportation

For each applicable phase of construction, a staging area will be identified for temporary storage of soil stockpiles. Access and egress routes for delivering soil to the specific staging areas will be developed by the construction contractor when staging areas are identified. Access and egress routes will be provided to the waste hauler by the construction contractor to allow for rapid and efficient delivery of roll-off bins to the staging area and/or disposal facility. During transport, roll-off bins containing soil shall be covered. The loaded trucks will proceed directly to a designated disposal facility as described in Section 5.4.4 of this Plan. For impacted soils, the transportation company will be responsible for having proof of valid hauler registration with the California EPA (Cal EPA) and shall ensure that all vehicles are properly registered, operated, and placarded in compliance with local, state, and federal requirements.

Loading and transporting of soil will be conducted in such a manner that the generation of dust is minimized. Dust suppression will be managed through the application of water spray and/or suspending loading activities. If at any time, dust emissions are observed to be causing adverse effects offsite, the EM will suspend field activities until the problem is corrected. The transportation

contractor will be required to follow Spill Response Guidelines in compliance with Federal regulations 49 CFR 172.602. The transportation contractor will ensure that each driver is equipped with an Emergency Response Guidebook and is properly trained to respond to an emergency. The onsite EM will observe the contaminated soil loading and other related activities and will follow the requirements of the HASP. The excavation contractor will be responsible for ensuring that transportation activities are in accordance with this Plan, relevant Project plans, and their Health and Safety Program.

Sunset Boulevard, LLC, a contractor for Sunset Boulevard, LLC or a designated agent will sign disposal manifests prior to offsite transportation for disposal.

5.4.4 Soil Disposal

Once laboratory analytical data for a specific stockpile is received, the data will be forwarded to a waste transportation and disposal contractor for profiling and manifesting. The concentrations of COCs in soil will be used for waste classification and identifying an appropriate disposal location on a case-by-case basis. For disposal of non-hazardous materials, soils may be transported to the selected Class III Landfill. If excavated material is characterized as California-hazardous or RCRA hazardous waste, the disposal contractor will be consulted to determine the transportation route from the specific staging yard to the disposal facility.

Non-impacted soil generated during construction activities is anticipated to be disposed at the following:

Vulcan Sun Valley Landfill
11520 Sheldon Street
Sun Valley, CA 91352
(818) 768-4157

Non-hazardous, impacted soil generated during construction activities is anticipated to be disposed at an approved local Class III landfill such as:

Azusa Land Reclamation Landfill
1211 West Gladstone
Azusa, CA 91702
(800) 963-4776

OR

Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342
(818) 362-2124

Soil characterized as California-Hazardous or RCRA hazardous waste is anticipated to be disposed at an approved Class I landfill such as:

Clean Harbors
2500 W. Lokern Road
Buttonwillow, CA 93206
(661) 762-6200

5.5 Record Keeping and Reporting

The EM and PE will maintain records of monitoring and sampling activities conducted during the monitored activities. The locations of impacted soil and/or oil wells and where soil is stored will be recorded in daily summary logs. The EM will also document the potential COCs in each stockpile and designate the sampling methodology to characterize for disposal (Section 5.2.4). Field monitoring results, observations, and analytical data will be tabulated at the conclusion of the construction activities. Sunset Boulevard, LLC, or their authorized representative will report the findings of field monitoring and laboratory analyses to the City of Los Angeles, Department of City Planning and appropriate agency as required.

In accordance with the Project's SWPPP, weekly site inspections (visual observations) will be conducted at the Project site by the QSP or a trained individual directed by the QSP. For each inspection required for the Project, the QSP shall complete a Site Inspection Form, which will be maintained on site within the SWPPP. Inspections will include all BMPs implemented on site at the time of inspection, including stockpiles and containerized wastes. If failures or other shortcomings are identified, the QSP will notify the contractor and LEI so that BMPs will be repaired or design changes will be implemented within 72 hours of identification and completed as soon as possible.

5.6 Security Requirements

The soil generated during construction will be stored at a project storage area. and will be secured through compliance with the following requirements:

- Soil stockpiles will be stored in a secured (gated, locked, and/or guarded) location to prevent risk of damage, vandalism, theft, and exposure to the public.
- Impacted soil may be temporarily stored within the Project site during construction hours but will be returned to a secured location for overnight storage and/or during non-construction periods.

6. Limitations

This Plan has been prepared in accordance with current practices and the standard of care exercised by scientists and engineers performing similar tasks in this area. The measures contained in this Plan are based solely on the analysis of the conditions observed by Geosyntec and others, and in accordance with relevant and applicable federal, state, and local regulations. We cannot make any assurances concerning the completeness of the data presented to us. Environmental characterization was beyond the scope of this investigation.

No warranty, expressed or implied, is made regarding the professional opinions expressed in this report. If actual conditions are found to differ from those described in the Plan, or if new information regarding the site conditions is obtained, Geosyntec should be notified and additional recommendations, if required, will be provided. Geosyntec is not liable for any use of the information contained in this Plan by persons other than Sunset Boulevard, LLC or their subconsultants, or the use of information in this Plan for any purposes other than referenced in this Plan without the expressed, written consent of Geosyntec.

7. Closing

Geosyntec appreciates this opportunity to provide Sunset Boulevard, LLC this Plan. If you have any questions or require additional information, please contact the undersigned.

Sincerely,

Sincerely,

A handwritten signature in blue ink, appearing to read 'Yonas B. Zemuy', written over a horizontal line.

Yonas B. Zemuy, P.E.,
Senior Engineer
(714) 465-1256

A handwritten signature in blue ink, appearing to read 'Jared J. Warner', written over a horizontal line.

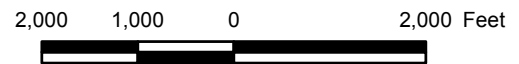
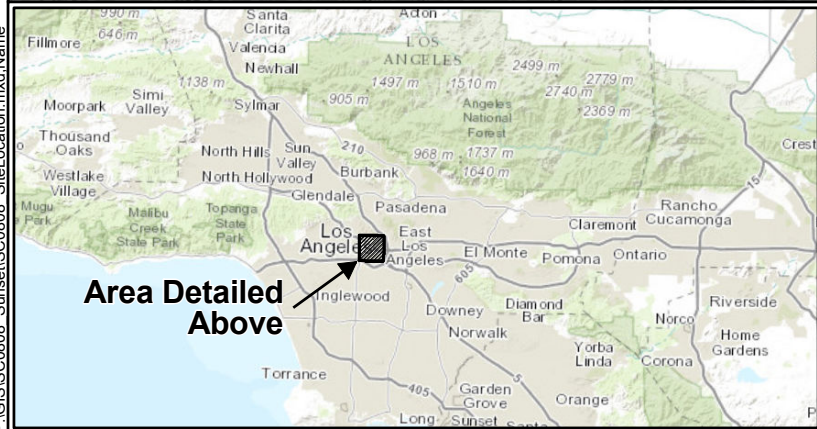
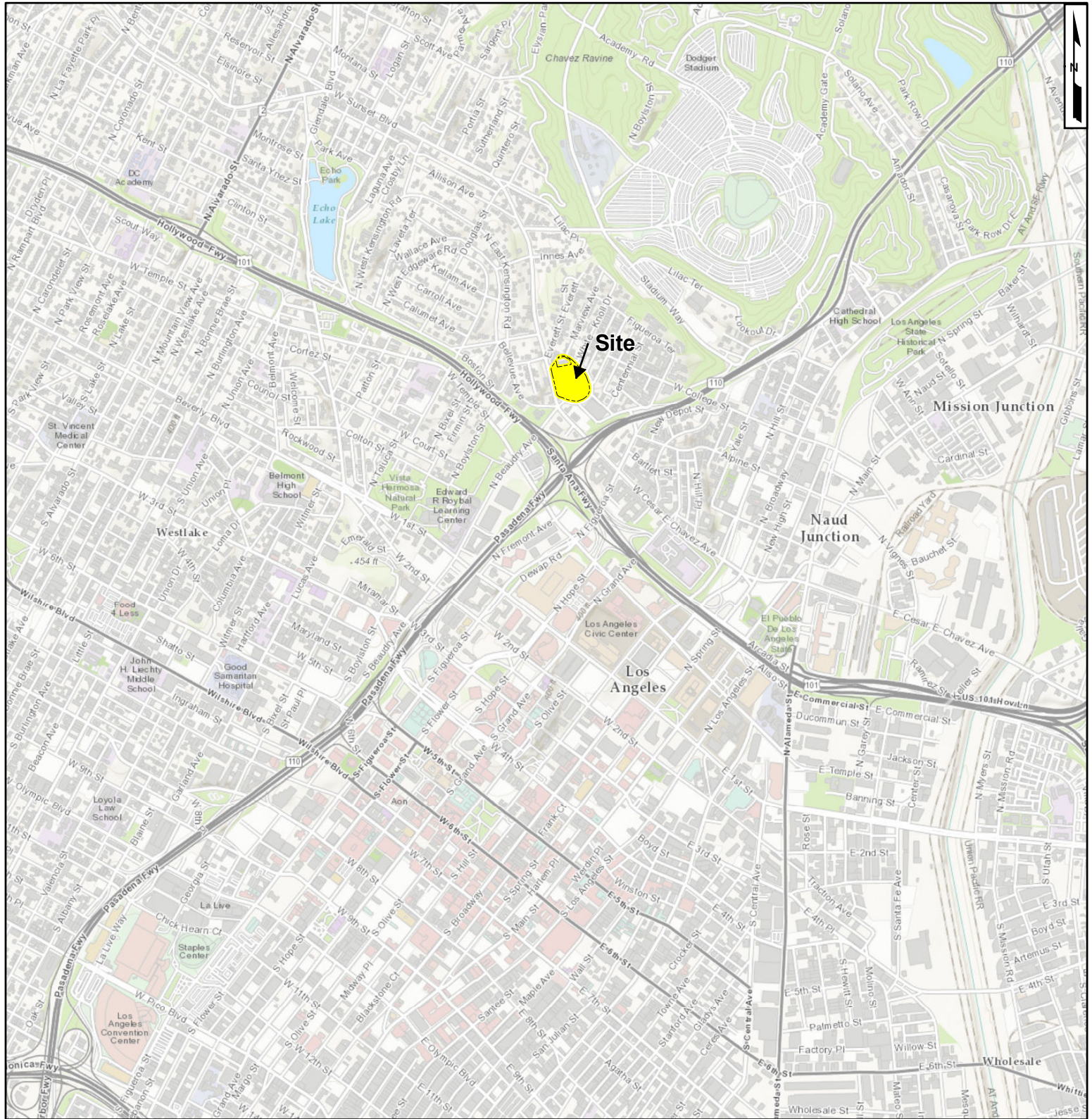
Jared J. Warner, P.G., C.E.G.
Project Engineering Geologist
(858) 716-2885

8. References

- ADR Environmental Group, Inc. (ADR), 2015. Subsurface Investigation Report for Commercial Property, 1111 West Sunset Boulevard, Los Angeles, CA, 90012. Project Number: LINE 01-15-006-CA (A). 7 May.
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- State Water Resources Control Board (SWRCB). 2009. Order 2009-0009-DWQ – Construction General Permit, 2 September 2009.
- United States Environmental Protection Agency (USEPA), 2021. Regional Screening Levels for Resident Soil, Region IX, May.

Figure 1: Project Location Map

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Project Location Map Soil and Site Management Plan 1111 Sunset Boulevard Los Angeles, California 90012

Geosyntec
 consultants

Figure

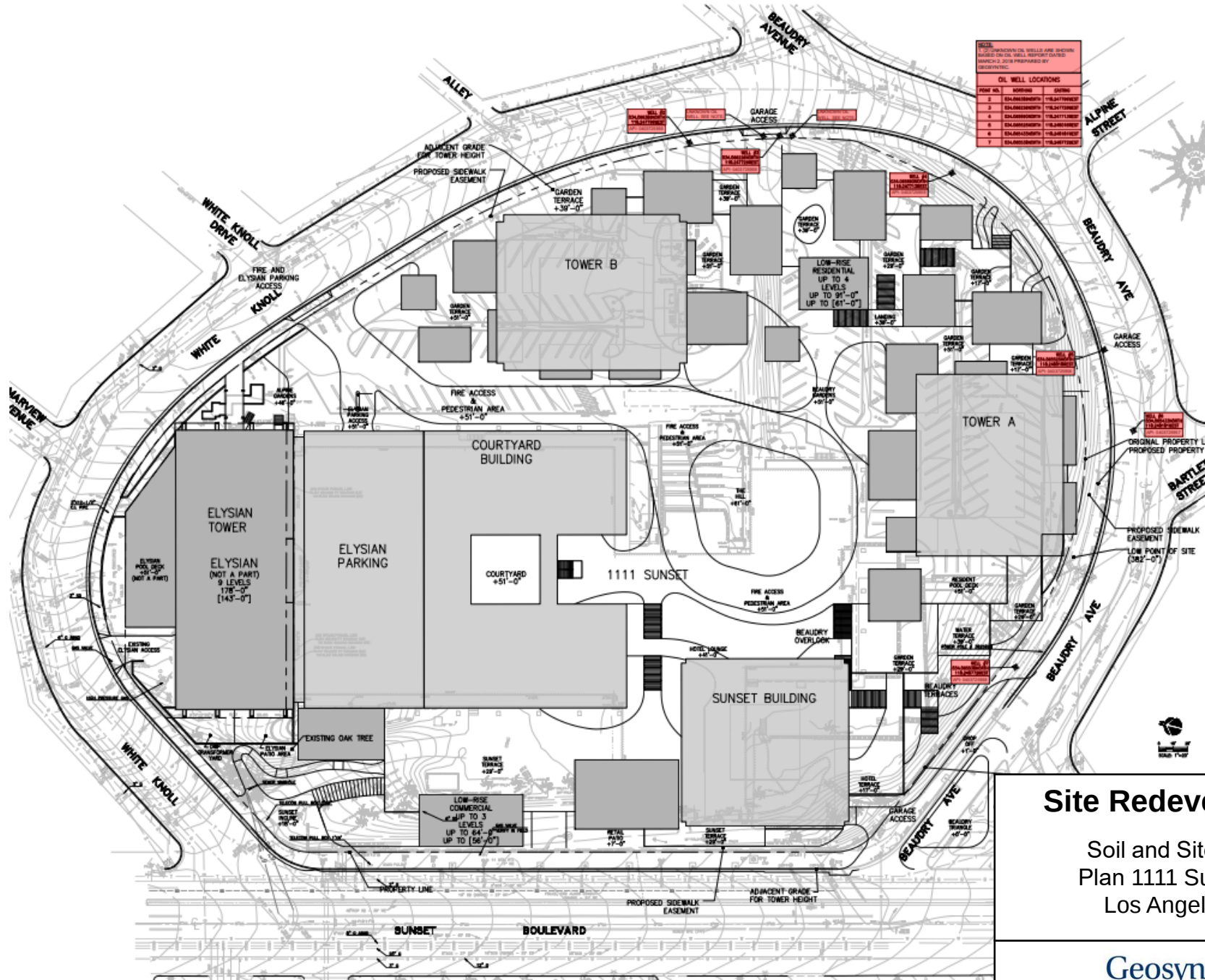
1

Huntington Beach

June 2021

Figure 2: Site Redevelopment Plan

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Site Redevelopment Plan

Soil and Site Management
Plan 1111 Sunset Boulevard
Los Angeles, California

Geosyntec
consultants

Huntington Beach

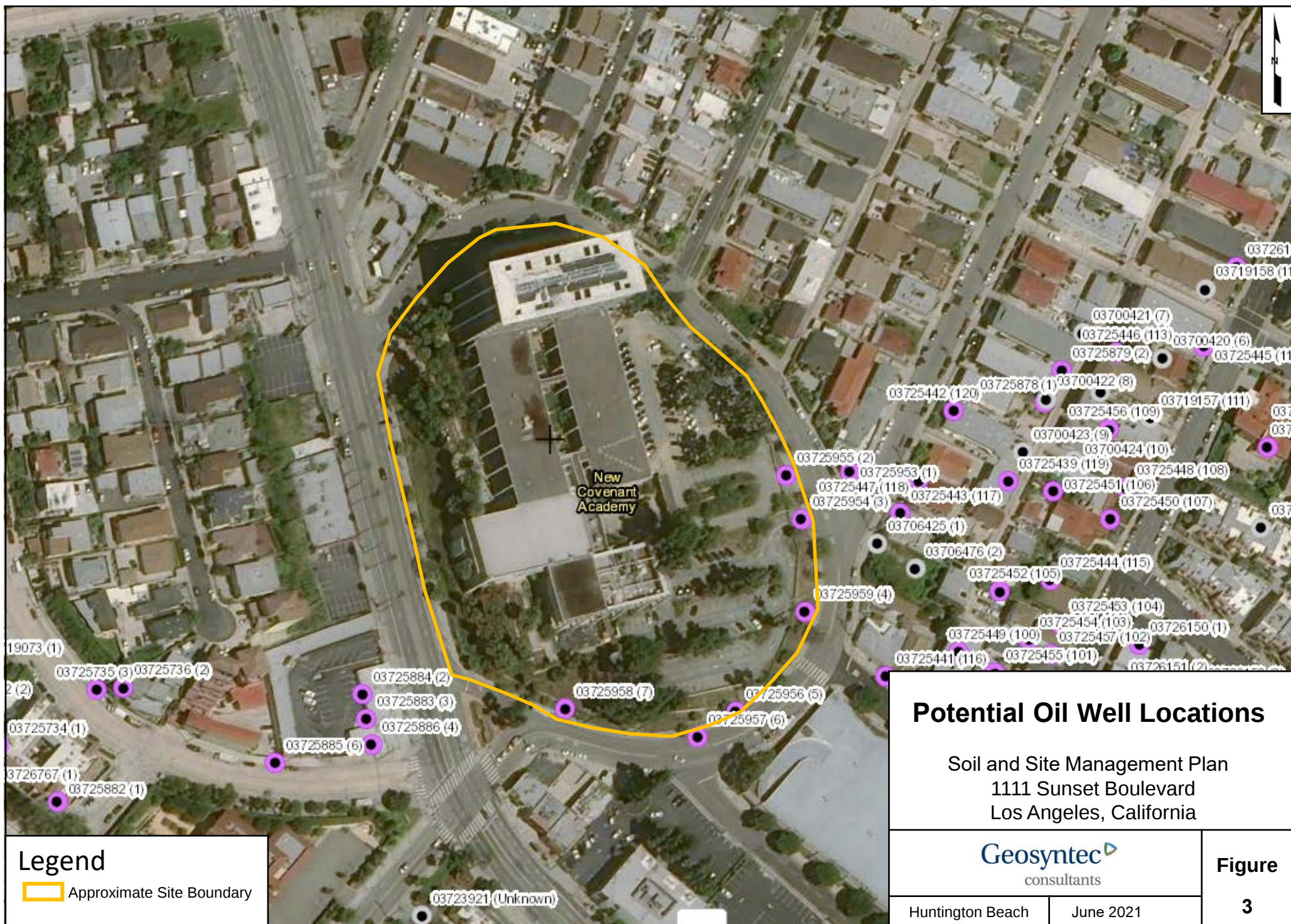
June 2021

Figure

2

Figure 3: Potential Oil Well Locations

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Appendix A Project Contact List

Appendix A Project Contact List

Company/ Organization	Title	Applicable Project Component	Name/Address	Telephone Number
Company Contacts				
Sunset Boulevard, LLC	Project Manager	Project Wide	TBD	TBD
TBD	Environmental Project Manager	Project Wide	TBD	TBD
TBD	Lead Environmental Inspector	Project Wide	TBD	TBD
TBD	Petroleum Engineer	Project Wide	TBD	TBD
Geosyntec Consultants	Hazardous Materials Specialist	Project Wide	TBD	TBD
Geosyntec Consultants	Environmental Monitor	Project Wide	TBD	TBD
Geosyntec Consultants	Lead Qualified SWPPP Practitioner	Project Wide	TBD	TBD
Federal and State Contacts				
Department of Toxic Substances Control	Cypress Field Office	Project Wide	5796 Corporate Avenue Cypress, CA 90630	(714) 484-5300
Regional Water Quality Control Board – Region 4	TBD	Project Wide	320 W 4 th Street, Suite 200 Los Angeles, CA 90013	(213) 576-6600
United States Environmental Protection Agency	National Response Center	Project Wide	N/A	(800) 424-8802
California Geologic Energy Management Division – Southern	Associate Oil and Gas Engineer	Project Wide	Grace Brandt 3780 Kilroy Airport Way, Suite 400 Long Beach, CA 90806	(562) 637-4400
Local Contacts				
City of Los Angeles	Department of City Planning	Project Wide	221 North Figueroa St, Suite 1350 Los Angeles, CA 90012	TBD

Company/ Organization	Title	Applicable Project Component	Name/Address	Telephone Number
TBD	TBD	TBD	TBD	TBD
Disposal Facilities				
Clean Harbors	Class I Disposal – RCRA	As-Needed	2500 W. Lokern Road Buttonwillow, CA 93206	(661) 7626200
Azusa Land Reclamation Landfill	Class III Disposal – Non-RCRA	As-Needed	1211 West Gladstone Azusa, CA 91702	(800) 963-4776
Sunshine Canyon Landfill	Class III Disposal – Non-RCRA	As-Needed	14747 San Fernando Road Sylmar, CA 91342	(818) 362-2124
Vulcan Sun Valley Landfill	Landfill	As-Needed	11520 Sheldon Street Sun Valley, CA 91352	(818) 768-4157