

Technical Memorandum

To: Lauren Rhodes and Jan Green Rebstock, Environmental Management Group, Bureau of Engineering, Department of Public Works, City of Los Angeles; Kari Derderian and Clare Lahey, Bureau of Transit Services, Los Angeles Department of Transportation, City of Los Angeles

From: Andrew Leavitt, P.G., Principal Geologist, Parsons
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Date: July 28, 2022

Re: Los Angeles Department of Transportation Electric Bus Maintenance Facility - Hazardous Materials Analysis

1.0 PURPOSE AND ORGANIZATION OF THIS MEMO

The purpose of this memorandum is to document the results of the hazardous materials analysis as it relates to the potential environmental impacts associated with the construction and operation of the Los Angeles Department of Transportation's (LADOT) Electric Bus Maintenance Facility (EBMF or project) in South Los Angeles. This technical memo is prepared in support of the Initial Study to be prepared in compliance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines and the Environmental Assessment to be prepared in compliance with the National Environmental Policy Act (NEPA). The information presented in the technical memo is based on the *Phase I Environmental Site Assessment* (Phase I ESA) and the Phase II Environmental Site Assessment and Additional Site Assessment Report (Phase II ESA) completed for the proposed project site by Stantec Consulting Services (Stantec) in May 2019 and October 2019, respectively.

2.0 PROJECT DESCRIPTION

2.1 Project Location and Setting

The City of Los Angeles (the City) is proposing to construct the EBMF on the 5.5 acre land located at 740 and 800 East 111th Place in South Los Angeles (Assessor's Parcel Numbers [APNs] 6071-022-009 and 6071-022-013). The project site is located on light industrial zoned land and has been recently utilized as a logistics warehouse for solar panels. The site is within Council District 8's jurisdiction in the Southeast Los Angeles Community Planning Area of the City (Figures 2-1 and 2-2). The proposed project will be operated by the Los Angeles Department of Transportation (LADOT).

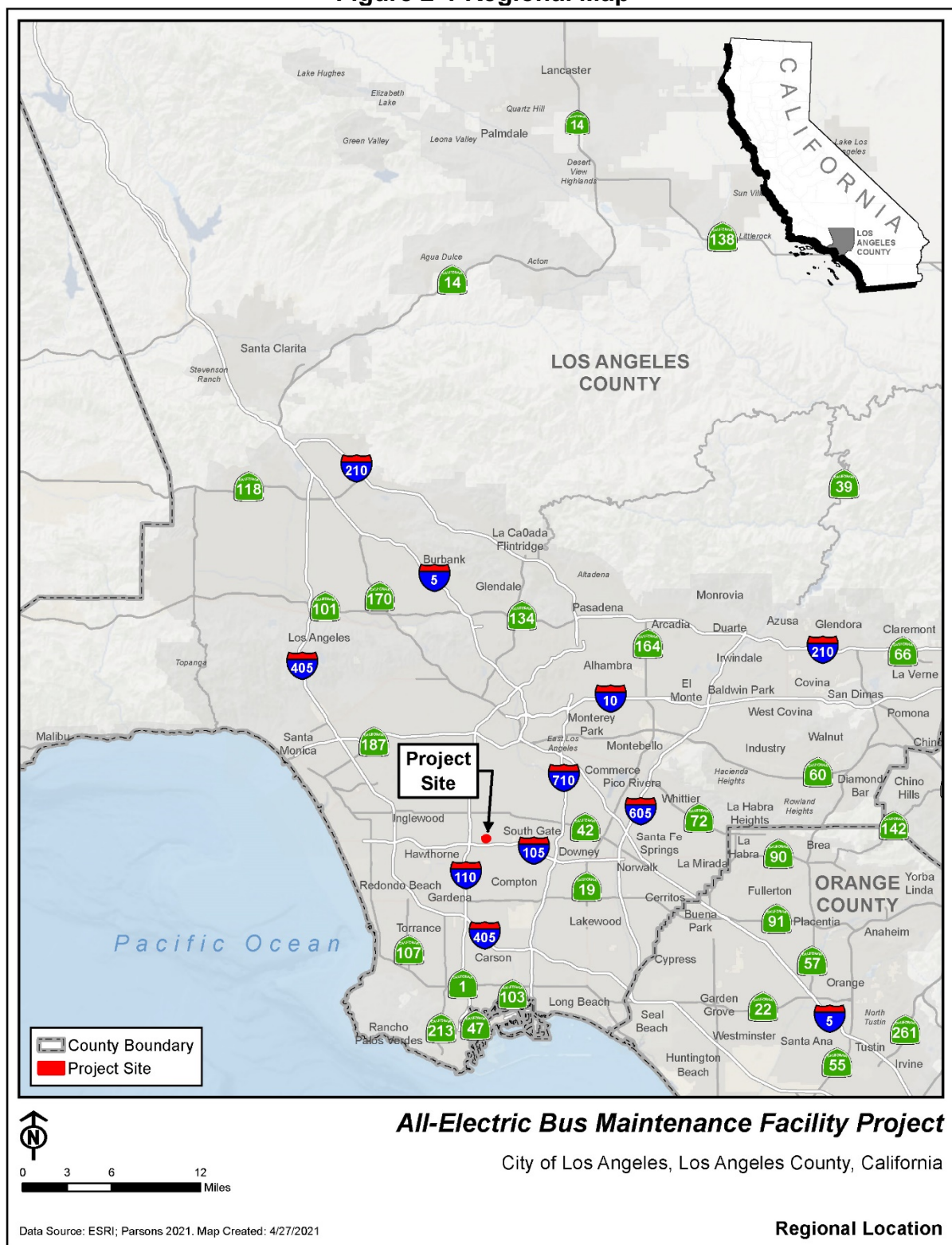
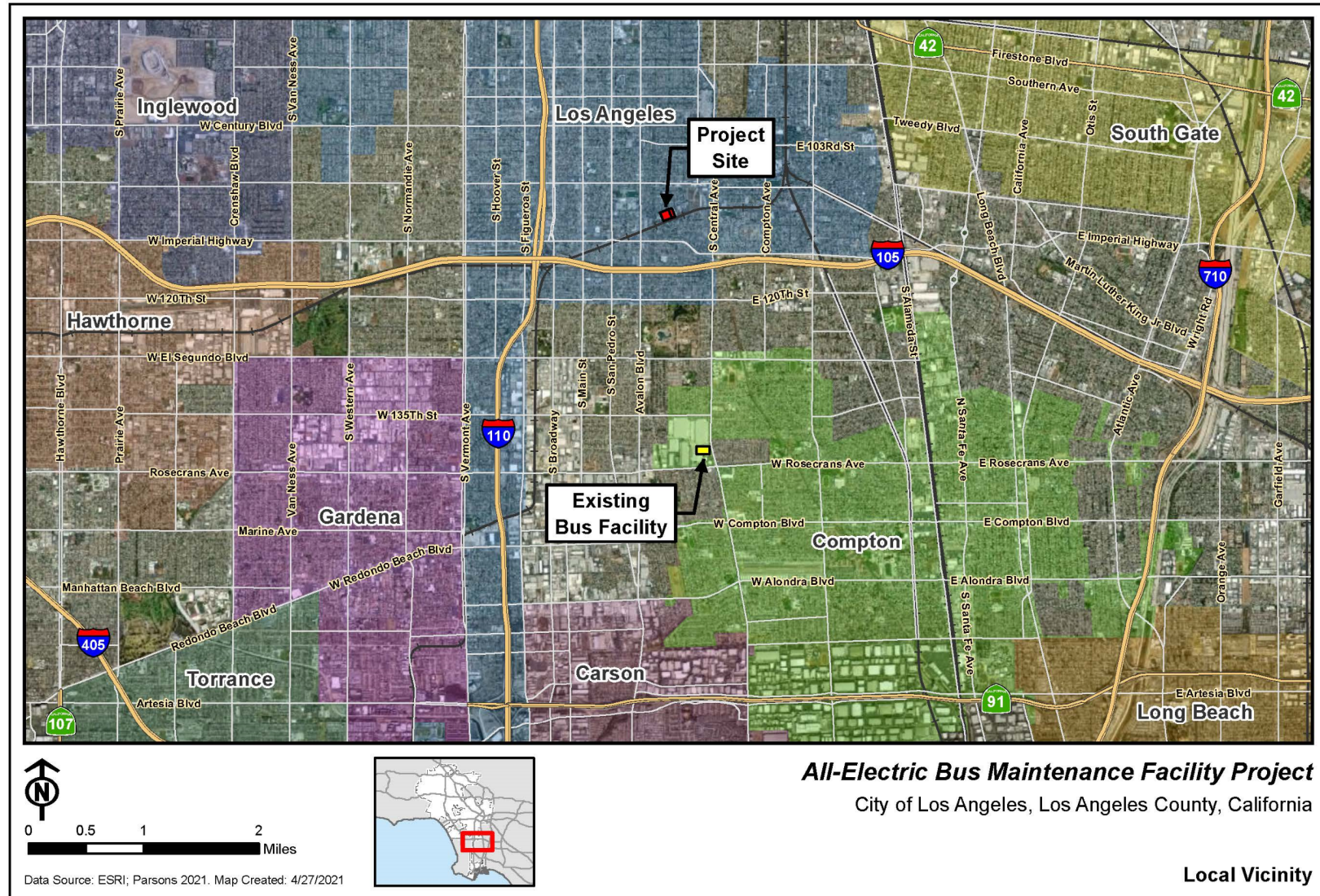


Figure 2-2 Project Location Map



The project site is located between East 111th Place and East Lanzit Avenue, east of South Avalon Boulevard, and has a relatively flat topography. Small clusters of light-industry land uses can be found in the immediate vicinity of the project site, with adjacent land uses surrounding the project site comprised mostly of multi-family and single-family residences but also encompassing land supporting other activities, including commercial and community-oriented social services, such as education and health facilities. The area is largely urbanized and nearly built-out with little remaining vacant land. There are no natural features or major land formations, surface water bodies, or waterways near the project site.

The site is bounded by East 111th Place to the northwest, with single family residences across the street and by the Union Pacific Railroad (UPRR) tracks and Lanzit Avenue to the south, with single family residences beyond the tracks and street. Two buildings exist on the site: a 32,000-square-foot warehouse built in 1957 at the eastern section and a 118,800-square-foot warehouse built in 1956 at the central and western sections. The buildings sit back to back and the eastern and western ends of the site are paved as internal driveways and parking areas. The Animo James B. Taylor Charter Middle School is immediately to the east and the Kedren Health Community Center (which provides primary care, mental health care, and a Headstart/State preschool) is immediately to the west.

The project site is designated as Limited Industrial in the Southeast Los Angeles Community Plan and is zoned M1-1-CPIO (Limited Industrial Zone, Height District 1, Community Plan Implementation Overlay District). This site is in Section 5, Township 3 South, Range 13 West and specifically at the following latitude/longitude: 33 56' 4.65"N 118 15' 35.9"W.

Access to the site is provided by two driveways off East 111th Place, a street that is designated as a local collector with one lane in each direction and allows daytime on-street parking on each side. The UPRR rail line runs parallel to East Lanzit Avenue south of the project site. Imperial Highway and Interstate 105 (I-105) are located approximately three and seven blocks south of the project site, respectively.

Figure 2-3 presents an aerial view of the project site and its general vicinity.

Figure 2-3 Aerial View of Project Site and its Immediate Vicinity

2.2 Proposed Project Description

LADOT operates and maintains its existing bus fleet from its South Los Angeles Bus Maintenance Facility, located at 14011 South Central Avenue in Compton. This current facility is not owned by the City and is leased through LADOT's operations services contractor. The existing facility does not have sufficient capacity to accommodate the additional maintenance and storage requirements of the proposed transition to electric buses and expanded charging needs of an all-electric bus fleet.

LADOT proposes to build a bus maintenance facility at the project site to serve its future electric bus fleet. The proposed EBMF is planned as a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet, consisting of 130 all-electric battery bus vehicles for the DASH and Commuter Express services provided by LADOT. The EBMF would be used to store and dispatch electric buses for daily service and would provide repair and maintenance services, parking, charging, and inspection functions. The proposed facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility).

After demolition of the existing buildings on the site, the City proposes to construct several buildings and structures, including a two-story operations building to provide dispatch and administrative functions, a maintenance building with 10 bus maintenance bays, a service building, a bus wash building, Battery-Electric Bus (BEB) parking/charging area, and a

second-story parking deck for up to 360 employee/visitor vehicles, with the canopy above the parking deck topped with a 2,000-kilowatt photovoltaic (PV) system. Electrification equipment, including electrical transformers, switch cabinets, and bus chargers, is also proposed.

The EBMF would provide preventive maintenance inspections, BEB charging, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It would also accommodate administrative and operations functions and be used as a report base for bus operators. It would include space for employee parking, conference meeting rooms, operations and maintenance staff offices, dispatcher workstations, employee report and recreation rooms, and areas with lockers, showers, and restrooms for operations and maintenance personnel.

The proposed project facility would accommodate as many as 70 of the 30-foot-long DASH buses and 60 of the 45-foot-long Commuter Express buses, comprising a total of 130 BEBs that would be assigned to the new South Los Angeles EBMF. The facility would include surface parking spaces for 130 BEBs in an area located east of the Maintenance Building. The BEBs running easterly from Avalon Boulevard would enter the site through the west entrance driveway on East 111th Place, check in with the onsite security guard, and proceed into the site to the southern section for service and washing. Otherwise, BEBs requiring repairs would park at the bus bays along the western section. Other BEBs may directly run in a counterclockwise direction and park at the central area for charging. The BEBs would leave the site through the east exit driveway and run westerly on East 111th Place to Avalon Boulevard. Vehicles driven by bus operators, proposed project staff, other employees, and visitors would enter and exit through the center driveway that connects to a ramp leading to the second-level parking deck.

The construction schedule for the proposed project has not been determined. For environmental analysis purposes, it is assumed construction would be completed in 24 months following the final engineering design and bidding process in 2023. Any required remediation would be completed prior to the start of construction activities. Assuming no or limited remediation is necessary, project construction is tentatively scheduled to begin in mid-2024 and would be completed by mid-2026. Construction activities at the proposed project site would include mobilization and staging; building demolition; site clearing, grading and paving; new structure construction, equipment installation, and minor landscaping and finishing.

Approximately 312 employees would be working onsite, and the facility is planned to be open 24 hours per day, 7 days per week. Staff would be onsite on two or three shifts, which would be staggered depending on their work responsibilities.

3.0 EXISTING CONDITIONS

The following subsections summarize the Phase I ESA and Phase II ESA reports.

3.1.1 Phase I ESA

The Phase I ESA was completed for the properties located at 740 and 800 East 111th Place in Los Angeles, California, on behalf of the Department of Public Works, LA Sanitation & Environment (LASAN). The Phase I ESA was conducted in accordance with the requirements of American Society for Testing and Materials (ASTM) Designation E 1527-13, and All Appropriate Inquiry (AAI) as defined by the USEPA in Title 40 of the Code of Federal Regulations, Part 312.

As reported in the Phase I ESA, the project site comprise a total area of approximately 5.37 acres and is located in a primarily residential area of Los Angeles. Both residential and commercial developments surround the site, including the Kedren Head Start (a preschool) to the west and the Animo James B. Taylor Middle School to the east. Residential properties are adjacent to the site on both the north and south.

The 740 East 111th Place property (APN 6071-022-009) is developed with an approximately 118,800 square-foot single-story warehouse building (circa 1956), which is partitioned into two storage areas separated by a solid wall and an office space in the northwestern corner. At the time of the Phase I ESA site reconnaissance visit, the northern two-thirds of the warehouse was reportedly being used to store goods arriving from the Port of Los Angeles and/or Port of Long Beach, while the southern third was vacant. Two 350-gallon polyethylene totes with unknown contents were observed in the driveway. Small oil-like stains were observed in the southern warehouse. However, most of the floor space in the active warehouse was obscured by merchandise stacked on pallets, making it impossible to identify staining in these areas. Two electrical transformers were located inside warehouse structures; however, it is unknown if these units contain polychlorinated biphenyl (PCB). A sump that potentially captures surface water runoff was also identified on the northwest corner of the warehouse, near the loading dock. Numerous asphalt patches were observed in the exterior, some of which, appeared large enough to potentially indicate former soil excavations. The areas were large enough for an underground storage tank (UST) to have been previously present.

The 800 East 111th Place property (APN 6071-022-013) is developed with an approximately 32,250 square-foot single-story warehouse building (circa 1957) divided into three portions. At the time of the Phase I ESA site reconnaissance visit, the northern third of the building contained abandoned office space, the southern third was vacant, and the central third of the building was being used to store unused furniture, office supplies, and empty cardboard boxes. The southernmost third of the warehouse area was covered with bird droppings. An electrical transformer owned by LADWP was observed in the northeast corner of the driveway, however it is unknown if it contains PCBs. The granular sorbent was spread out over a large area in the driveway; however, it was unclear what had spilled. Most of the parking areas were being utilized for miscellaneous storage, however, the visible areas were generally oil stained. The miscellaneous storage included the following wastes:

- Roll-off bins containing soil and/or items to be segregated for recycling
- 55-gallon drums and 5-gallon buckets filled with used transmission fluid, used motor oil, other automotive lubricants, and used oil filters
- 350-gallon totes (some were empty) containing unknown liquid material
- Used metal fuel tanks
- Universal waste
- Obsolete set lighting (unknown if they contain PCBs)
- Inoperable vehicles and trailers at various states of decay

The Phase I ESA identified the following recognized environmental conditions (RECs) associated with the site:

- The historic presence of USTs used for fuels with a documented release, as well as the current use of the site for chemical storage with evidence of spills.
- Two environmental cases have previously been opened for 740 East 111th Place (Formerly Bell Industries Reliable Steel), both relating to unauthorized releases from on-site diesel USTs. The impacts to soil were identified during the removal of both USTs; first, the 7,000-gallon diesel UST tank in 1988, followed by the removal of the 10,000-gallon diesel UST in 1994. Remedial action (excavation) was completed for both cases. No record of a 'No Further Action' designation for the case related to the 7,000-gallon UST was found. However, the Phase I ESA concluded that this was related to incomplete records rather than a continued violation. The case related to the removal of the 10,000-gallon UST did receive a 'No Further Action' notice from the City of Los Angeles Fire Department following the completion of excavation activities in 1994. These two former cases were identified as RECs due to the potential for residual contamination to remain in the soil and the potential to have created a potential vapor intrusion issue.
- Records identified several fuel USTs as having been present at 800 East 111th Place (formerly Aircraft & Component Equipment Suppliers). Based on these records, the potential exists for at least two of the USTs to remain in place.
- Chemical and waste storage were identified at both properties during the site reconnaissance visit, including, but not limited to, totes with unidentified liquids, soil bins, vessels with petroleum hydrocarbons, and various solvents. Additionally, distressed asphalt, as well as evidence of surface releases (staining, sorbent materials, etc.) were observed throughout the exteriors of both properties. The presence of this combination of chemicals and the stained, distressed asphalt were identified as a REC. The distressed surfacing presents a potential pathway for those chemicals to migrate into the underlying soil.

Based on these RECs, the Phase I ESA recommended the completion of a Phase II ESA, including the collection of soil and sub-slab soil vapor samples for laboratory analyses, to

assess the presence of any subsurface impacts from potential chemicals of concern (PCOCs). Additionally, it was recommended that a geophysical survey be completed to evaluate if any of the USTs remained at the two properties.

Finally, based on the years of construction (1956-1957), both buildings on the two properties have a higher risk of containing asbestos-containing materials (ACMs), PCBs in caulk, transformers, and other old electrical equipment, and/or lead-based paint. In accordance with South Coast Air Quality Management District (SCAQMD) Rule 1403, a pre-demolition building survey for ACM is required before demolition. Therefore, a pre-demolition survey is recommended for ACMs, lead-based paint, PCBs, and other hazardous materials before any on-site demolition.

3.1.2 Phase II ESA and Additional Site Assessment

A Phase II ESA was completed for the 740 and 800 East 111th Place properties, including soil and sub-slab soil vapor sampling, to evaluate the potential for impacts to the subsurface from volatile organic compounds (VOCs), metals, and total petroleum hydrocarbons (TPH). As part of the Phase II ESA, 16 soil borings were drilled to a maximum terminal depth of 25 feet below ground surface (ft bgs). A total of 49 soil samples were submitted for laboratory analysis for VOCs, TPH, and total metals. Additionally, 13 sub-slab soil vapor samples were collected from 12 Cox-Colvin Vapor Pins[™] that were installed in the slabs of both the existing buildings. The 13 sub-slab soil vapor samples were analyzed for VOCs, fixed gases, and methane.

TPH in both the diesel (DRO) and waste oil (ORO) ranges, as well as four VOCs (acetone, benzene, toluene, and tetrachloroethene [PCE]), were detected in soil samples. However, all concentrations were below regulatory screening levels. Additionally, several metals were detected in the soil samples that were analyzed. Arsenic was the only metal with concentrations that exceeded screening levels. All detected concentrations were below background levels (12 mg/kg) typical of southern California as accepted by the Department of Toxic Substances Control (DTSC). All other metal detections were below their corresponding regulatory screening levels.

The soil vapor analytical results were compared to screening levels published by the DTSC HERO Note Number 3 – Modified Screening Levels for Ambient Air. The commercial use screening levels were calculated by applying the DTSC recommended attenuation factor of 0.03 for sub-slab soil gas and ‘near-source’ exterior soil gas (DTSC 2019) to the ambient air screening level. Several VOCs were detected in the 13 sub-slab soil vapor samples. Apart from PCE, all were below their corresponding screening levels. PCE was detected in seven of the sub-slab soil vapor samples submitted for laboratory analysis at concentrations ranging from 91 to 1,200 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). All seven of these detected concentrations of PCE exceeded the calculated (commercial) soil vapor screening level of $66.7 \mu\text{g}/\text{m}^3$. The highest concentrations of PCE were observed beneath the 800 East 111th Place building.

Based on the concentrations of PCE in sub-slab soil vapor along with the age and condition of the buildings, the Phase II ESA concluded that the potential exists for

impacted soil vapor to be intruding into the buildings. As such, an additional site assessment at the 800 East 111th Place property is recommended to further characterize the extent of PCE impacts to the project site.

The Additional Site Assessment included the drilling of 10 soil borings on the 800 East 111th Place property for the collection of soil and soil vapor samples. A total of 59 soil samples were submitted for laboratory analysis of VOCs. Borings SV-1 through SV-7 were drilled to 15.5 ft bgs and completed as dual-nested soil vapor probes. Borings SV-8 through SV-10 were drilled to 30.5 ft bgs and completed as triple-nested soil vapor probes. A total of 17 soil vapor samples were collected from the newly installed vapor probes and analyzed for VOCs.

Four VOCs (acetone, benzene, toluene, and PCE) were detected in the soil samples analyzed as part of the Additional Site Assessment, however, all at concentrations below regulatory screening levels.

Several VOCs were detected in the 17 soil vapor samples, however, apart from PCE, all were below their corresponding screening levels. PCE was detected in all 17 of the soil vapor samples submitted for laboratory analysis at concentrations ranging from 11 to 2,100 $\mu\text{g}/\text{m}^3$. Fifteen of these detected concentrations of PCE exceeded the calculated soil vapor screening level of 66.7 $\mu\text{g}/\text{m}^3$. Elevated PCE concentrations were observed at all depth intervals that were sampled. The highest PCE concentrations were observed along the central southern boundary of 800 East 111th Place. The plume of impacted soil vapor appears to extend north beneath the on-site building, west beneath the 740 East 111th Place building, and east beneath the Animo James B. Taylor Charter Middle School.

Based on the combined investigations, the Phase II ESA made the following conclusions:

- While VOCs, TPH, and metals were identified in soil, all concentrations were below regulatory screening and/or established background levels. As such, the soil does not appear to pose a risk to human health at the project site.
- Soil vapor beneath the site is impacted with PCE at concentrations above the screening level of 66.7 $\mu\text{g}/\text{m}^3$, which poses a potential risk to human health. Impacts extend vertically to at least 30 ft bgs and laterally beneath the building located on 740 East 111th Place and potentially beneath the eastern-adjacent building of the Animo James B. Taylor Charter Middle School.
- Neither the lateral nor the vertical extents of the PCE plume were identified during these two investigations.
- Based on the historic use of 800 East 111th Place as an aircraft component and equipment supplier, and the (then) current use as a waste storage facility, the PCE impacts are likely a result of undocumented release(s) of chemicals into the soil.
- The potential exists for the PCE impacts to have migrated vertically into groundwater. If this is the case, there is also the potential for the PCE

impacts to have comingled with a solvent-impacted groundwater plume that was generated at a site approximately 1,000 feet east of the property, known as the Lanzit Project.

- The solvent-impacted groundwater was likely the source of the PCE impacts in soil vapor.
- Other impacts to soil may exist beneath the site, but the current storage of waste, equipment, and other debris prevented these areas from being tested.

4.0 REGULATORY SETTING

4.1 Federal

4.1.1 Toxic Substances Control Act/ Resource Conservation and Recovery Act/ Hazardous and Solid Waste Act

The Toxic Substances Control Act (TSCA) of 1976 and the Resources Conservation and Recovery Act (RCRA) of 1976 established the U.S. Environmental Protection Agency (U.S. EPA)-administered program to regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. TSCA authorized the U.S. EPA to secure information on new and existing chemical substances, and to control the substances that were determined to cause unreasonable risk to public health or the environment. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” systems of regulating hazardous wastes.

4.1.2 Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the U.S. EPA is given the power to seek out those parties responsible for any release and assure their cooperation in the cleanup. The U.S. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, U.S. EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. U.S. EPA also recovers costs from financially viable individuals and companies once a response action has been completed (U.S. EPA, 2018).

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. SARA reflected the U.S. EPA's experience in administering the complex Superfund program during its first six years and made several important changes and additions to the program. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites; required

Superfund actions to consider the standards and requirements found in other State and Federal environmental laws and regulations; provided new enforcement authorities and settlement tools; increased State involvement in every phase of the Superfund program; increased the focus on human health problems posed by hazardous waste sites; encouraged greater citizen participation in making decisions on how sites should be cleaned up; and increased the size of the trust fund to \$8.5 billion.

SARA also required U.S. EPA to revise the Hazard Ranking System to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the National Priorities List (NPL) (U.S. EPA, 2018).

4.1.3 Clean Water Act

The Clean Water Act (CWA) of 1977 (33 U.S.C. 1251 et seq.), which amended the Federal Water Pollution Control Act of 1972, established the basic structure for regulating discharges of pollutants into the waters of the United States (not including groundwater) and was designed to restore and maintain the chemical, physical and biological integrity of the waters of the United States. The CWA delegates authority to the U.S. Environmental Protection Agency (U.S. EPA) to implement pollution control programs. Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters. In addition, the CWA requires that states adopt U.S. EPA-approved water quality standards for water bodies. Water quality standards consist of two components: 1) designated beneficial uses for a receiving water body (e.g., wildlife habitat, agricultural supply, fishing) and 2) the water quality criteria necessary to support those uses. The 1987 amendments to the CWA added Sections 401 and 402, which establish a framework for regulating municipal and industrial storm water discharges under the National Pollution Discharge Elimination Systems (NPDES) program, as discussed below.

Section 303: Impaired Water Bodies (303[d] List) and Total Maximum Daily Loads

Section 303(d) of the CWA requires each state to identify and list impaired surface waters that do not meet, or that the state expects will not meet, state water quality standards. This is a subset of the 305(b) list, which contains information on all water bodies. The water quality standards are promulgated under the National Toxics Rule (NTR) or the California Toxics Rule (CTR) after minimum technology-based effluent limitations have been implemented for point sources. For these waters, the local jurisdictions are required to develop total maximum daily loads (TMDLs) of pollutants for impaired water bodies and a program of implementation to meet the TMDLs. The TMDL must account for the pollution sources that caused the water bodies to be listed by the state. The TMDL is a calculation of the maximum amount of a pollutant that a water body can receive while still meeting water quality standards. TMDLs also define an allocation of that load among the various sources of that pollutant (i.e., municipalities, other permitted entities).

Additionally, the TMDL can act as a plan to reduce pollutant loading, which improves water quality. After implementation of a TMDL, it is anticipated that the problems that led to placement of a given pollutant on the Section 303(d) list would be remediated.

Section 401: Water Quality Certification

Section 401 of the CWA certification provides for the protection of the physical, chemical, and biological integrity of waters. Section 401 requires that when applying for a federal permit for proposed activities that may discharge into waters of the United States, the applicant is required to obtain certification from the state that the discharge will comply with the provisions of the CWA. Applicants are required to meet the effluent limitations and monitoring requirements necessary to ensure compliance with the federal license or permit.

Section 402: National Pollutant Discharge Elimination System (NPDES) Permits

Section 402 of the CWA establishes the NPDES permit program to regulate all point source discharges to waters of the United States, including stormwater associated with construction activities, industrial operations, and municipal drainage systems, to protect surface water quality. The NPDES permit program controls, minimizes, or reduces surface water impacts. Two types of the NPDES program stormwater permits would be relevant to the project, the Municipal General Permit and Construction General Permit.

4.1.4 Occupational Safety and Health Administration

The Occupational Safety and Health Administration's (OSHA) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in 29 CFR 1910.

4.2 State

4.2.1 California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought the California Air Resources Board (CARB), State Water Resources Control Board (SWRCB), RWQCB, CalRecycle, Department of Toxic Substances Control, Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed under the CalEPA "umbrella" for the protection of human health and the environment to ensure the coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

4.2.2 California Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) is the primary state agency with jurisdiction over hazardous chemical materials management. Through the enforcement of hazardous waste laws and regulations, DTSC is committed to protecting residents and their environment from exposure to hazardous waste (DTSC, 2020). The DTSC takes enforcement action against violators; oversees cleanup of hazardous wastes on

contaminated properties; makes decisions on permit applications from companies that want to store, treat or dispose of hazardous waste; and protects consumers against toxic ingredients in everyday products. The DTSC is committed to engaging the public in a way that gives those most affected by its decisions opportunities to voice their concerns and ask questions.

4.2.3 Cortese List

Government Code 65962.5 requires CalEPA to develop a hazardous waste and substances site list (Cortese List), which includes: hazardous waste sites according to DTSC and the Health and Safety Code; contaminated public drinking water wells sites listed by the State Department of Health Services; Underground Storage Tank (UST) leaks, solid waste facilities, and hazardous waste sites listed by the SWRCB; and other sites as designated by various other state and local governments. Section 6592.5 requires that the Cortese list be at least annually updated. The Cortese List complies with the CEQA requirements in providing information about the location of hazardous materials release sites.

4.2.4 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act restricts the disposal of wastes or any other activity that may degrade the waters of the state. The Porter-Cologne Water Quality Control Act requires cleanup of wastes that are below hazardous concentrations but could impact ground and surface water quality (Section 13002). The Porter-Cologne Water Quality Control Act established nine Region and State Water Boards, which are primarily responsible for protecting water quality in California. The Regional Water Boards regulate discharges by issuing permits through NPDES for waste discharge requirements for non-point source discharges. Anyone discharging materials or proposing to discharge materials that could affect water quality must file a report of waste discharge unless the discharge would be into a community sewer system (SWRCB, 2019).

4.2.5 Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (California Health and Safety Code, Chapter 6.11, Sections 25404–25404.9) provides authority to the Certified Unified Program Agency (CUPA). The CUPA for the City is the Los Angeles Fire Department (LAFD) Haz Mat Program.

The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the following hazardous materials programs: Site Mitigation Unit (SMU), Hazardous Materials Business Plan (HMBP) Program, California Accidental Release Prevention (CalARP) Program, UST Program, Above ground Storage Tank (AST) Program, Hazardous Waste Generator Program, and Hazardous Waste Tiered-Permitting Program.

4.2.6 California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal OSHA) and the federal OSHA are the agencies responsible for assuring worker safety in the workplace. Cal OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards would apply to construction activities.

4.2.7 California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The California Labor Code is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who oversee handling hazardous materials are appropriately trained and informed with respect to the materials they handle. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

4.3 Local

4.3.1 South Coast Air Quality Management District (SCAQMD) Rules

The SCAQMD has also established various rules to manage and improve air quality in the South Coast Air Basin (SCAB). The proposed project shall comply with all applicable SCAQMD Rules and Regulations pertaining to construction activities, including, but not limited to:

- **Rule 402 (Nuisance)** states that a person should not emit air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 (Fugitive Dust)** controls fugitive dust through various requirements including, but not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, limiting vehicle speeds on unpaved roads to 15 miles per hour, and maintaining effective cover over exposed areas. Rule 403 also prohibits the release of fugitive dust emissions from any active operation, open storage piles, or disturbed surface area beyond the property line of the emission source and prohibits particulate matter deposits on public roadways.

- **Rule 404 (Particulate Matter - Concentrations)** states that person shall not discharge into the atmosphere from any sources, particulate matter more than the concentration provided in the Table 404(a)28. A person shall not discharge into the atmosphere from any source, particulate matter more than 450 milligrams per cubic meter (0.196 grain per cubic foot) in discharged gas calculated as dry gas at standard conditions.
- **Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil** was adopted by the SCAQMD on August 5, 1988, and subsequently amended in 1995 and 2001. The rule sets requirements to control the emission of Volatile Organic Compounds (VOC) during the excavating, grading, handling, and/or treating of VOC-contaminated soil. Before these activities, an approved mitigation plan must be obtained from SCAQMD.
- **Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities** specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM), such as underground utility pipes, which may be applicable in some instances on the project site. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures, and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. Applicability of this rule, in whole or in part, applies to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos.

4.3.2 Los Angeles Fire Department (LAFD) Haz Mat Program

The LAFD provides emergency response and guidance to hazardous materials incidents within the City. The LAFD Haz Mat Program utilizes a unified approach with allied agencies (i.e. Los Angeles County Fire Department or LACFD) and many stakeholders to provide preparedness, prevention, response, mitigation, and resiliency to hazardous materials emergencies. The LAFD is an all-hazards response organization, and the Haz Mat Program is designed to address the natural, technological, or purposeful response challenges, including chemical, biological, radiological, nuclear, and explosive (CBRNE) threats to our community and national security.

In compliance with California state guidelines, each governmental agency designated by the State of California as a CUPA is authorized to apply statewide standards to each facility within its jurisdiction that treats hazardous waste on site or generates hazardous waste, USTs, or stores hazardous materials. In May of 2008, DTSC delegated corrective action oversight authority under Chapter 6.5 of Division 20 of California Health and Safety Code to implement corrective action under consent agreement at CUPA facilities within its jurisdiction. CUPAs are mandated by the State to establish a single billing statement

process for the collection of the fees and surcharges associated with the practices of each of the regulated businesses. LAFD is concerned with public safety and the environment as it relates to the management of hazardous materials and hazardous waste.

LAFD and the Los Angeles Police Department (LAPD) are first responders if a hazardous material or a hazardous-waste release incident is reported via 911. They work with many partnering and supportive agencies. A step by step notification, the Hazardous Materials Incident Contingency Plan protocol is published by the California Office of Emergency Services (OES). An OES checklist form is available online at <https://www.caloes.ca.gov/cal-oes-divisions/firerescue/hazardous-materials/hazmat-publications>. The notification process begins with calling 911 whereby the LAFD is notified of all releases and includes other agency notifications, as necessary. Some of the key partnering and supportive agencies are described further below.

LASAN's Watershed Protection Division assists the LAFD in ensuring that the quality of surface water and the watershed are protected during any hazardous materials incidents and response, including chemical and biological releases.

Other partnering support comes from the LACFD, with Deputy Health Officers assisting the LAFD in matters regarding public health and hazardous materials and waste release per a 1997 Memorandum of Understanding (MOU) between the LAFD and the LACFD. Various CUPA responsibilities are outlined in this MOU; the LACFD is identified as a CUPA Partnering Agency, in the areas of site mitigation, criminal investigations, and emergency response. In addition, the LA County Public Health Department continues to provide the City with expertise in other areas of public health such as communicable diseases, pathogens, vector and rodent control, severe biological and toxicological threats (e.g., anthrax, etc.). The LA County Public Health Department has been "Health Officer" for the City since 1964. In addition, the LA County Fire Department, Health and Hazardous Materials Division provides Tier 2 hazardous waste assessment and mitigation services (LACFD, 2020).

4.3.3 City of Los Angeles General Plan Safety Element

The City's General Plan Safety Element (Safety Element), which was adopted in 1996, addresses public safety risks due to natural disasters, including seismic events and geologic conditions; and sets forth guidance for emergency response during such disasters. The Hazard Mitigation section of the Safety Element includes the following goals and policies:

- Goal 1- A City where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water-related hazard, seismic event, geologic conditions or release of hazardous materials disasters is minimized.
- Policy 1.1.4 - Health/environmental protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of

the environment and public from potential health and safety hazards associated with program implementation.

4.3.4 City of Los Angeles Emergency Operations Organization and Hazard Mitigation Plan

The Department of Emergency Operations Organization (EOO) within the City is responsible for the City's emergency preparations (planning, training, and mitigation), response and recovery operations. The EOO is comprised of all agencies of the City's government and centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The 2018 Hazard Mitigation Plan (HMP) is prepared to lessen the vulnerability to disasters and to reduce 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 integrates 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.

5.0 IMPACT ANALYSIS

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines and the City's Thresholds, project impacts are analyzed for significance as follows:

- a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Reference: L.A. CEQA Thresholds Guide (2006) (Sections F.1 and F.2); Phase I ESA, Phase II ESA and Additional Site Assessment.

Comment: A significant impact may occur if the proposed project utilizes substantial amounts of hazardous materials as part of its routine operations and could potentially pose a hazard to the public under accidental or upset conditions

Less than significant impact with mitigation incorporated. Project construction would include the demolition of the existing buildings on the site, followed by the construction of several buildings and structures, including a two-story operations building to provide dispatch and administrative functions, a maintenance building with 10 bus maintenance bays, a service building, a bus wash building, and a second-story parking deck for up to 360 employee/visitor vehicles, with the canopy above the parking deck topped with a 200-kilowatt photo-voltaic system. The project would not introduce new land uses that would involve or require the routine transport, use, or disposal of hazardous materials. Lithium iron phosphate batteries would be present on the electric buses, but additional batteries would not be stored on-site. Instead, they would be replaced, as needed, with new ones brought to the site and old ones hauled away (anticipated to be every 12 years). Solvents,

oil, grease, and other cleaning products would also be needed for bus maintenance and repair activities but would be used, stored, and disposed of in accordance with current regulations.

The 800 East 111th Place property is listed as having up to two 7,500-gallon USTs and an unknown quantity of 2,000-gallon USTs containing regular unleaded fuel installed in 1975. The CA FID UST status is reported as “Active” and there is no indication that the USTs have been removed. Although there were no reported violations or releases, the storage, use, and disposal of petroleum hydrocarbons, as well as the potential presence of fuel USTs on-site was identified as a recognized environmental concern (REC) in the Phase I ESA. As presented in the Phase I ESA, several other containers containing potentially hazardous material and/or wastes are currently located on the property.

The 740-780 East 111th Place property is listed as generating and recycling approximately 12.51 tons of waste oil and mixed oil in 1994. This facility is also listed as having had two 9,940-gallon USTs containing regular unleaded fuel and an unknown quantity of 7,000-gallon USTs containing diesel fuel installed in 1956. The CA FID UST status is reported as ‘Inactive’. A review of UST information collected from local UST databases (Los Angeles Fire Department) indicates multiple releases of diesel from the former on-site USTs. The documented unauthorized release of two former USTs with potential for residual impacts to remain was identified as a REC in the Phase I ESA.

Based on these RECs, two subsequent subsurface investigations were completed at the site. Samples of soil and soil vapor were collected and analyzed for potential chemicals of concern (PCOCs). Volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) were identified in the soil at a concentration below human health risk (HHR) screening levels. However, the extent of impacts to soil was not delineated due to access issues. Tetrachloroethylene (PCE) was identified in soil vapor at concentrations exceeding HHR screening levels. Concentrations of PCE in soil vapor beneath both properties are considered hazardous to human health. Therefore, while the properties are not currently listed as hazardous waste/material cleanup sites, they likely will be once this data is reported to a regulatory agency in accordance with the state and federal related to reporting unauthorized releases. Once reported, additional characterization and subsequent remedial and/or mitigation measures will fall under the oversight of state or local agencies, such as the RWQCB, DTSC, and LAFD. LADOT would comply with any measures to be put in place by the designated oversight agency. It is anticipated that all hazardous wastes currently located on the project site would be removed before the construction of the proposed facility (MM-HAZ-1 to MM-HAZ-3). These measures would limit the exposure of the underlying contamination to the public, and therefore the short-term construction impact would be less than significant after mitigation.

It is anticipated that all hazardous wastes currently located on the project site would be removed prior to the construction of the EBMF facility. Implementation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Both project construction and post-construction operation would involve the transportation, use, storage, and disposal of limited quantities of hazardous materials such as paints, solvents, adhesives, fuel,

lubricants, grease, asphalt, and concrete materials. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the DTSC, the U.S. EPA, the OSHA, the LAFD, and the Los Angeles County Department of Public Health. Additionally, the project would comply with applicable federal, state, and local regulations related to hazardous materials (SC-HAZ-1 through SC-HAZ-5). The potential for the release of hazardous materials during project construction is considered low, and if a release was to occur, it would not result in a significant hazard to the public, surrounding land uses, or the environment due to the small quantities of materials being used at the site. Therefore, the short-term construction impact would be less than significant.

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?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and F.2); DTSC EnviroStor Data Management System (www.envirostor.dtsc.ca.gov/public); SWRCB listings on Geotracker (geotracker.swrcb.ca.gov).

Comment: A significant impact may occur if the proposed project involved a risk of accidental explosion or used substantial amounts of hazardous materials as part of its routine operations that could pose a hazard to the public under accidental or upset conditions.

Less than significant impact . As discussed above in *CEQA Analysis question (a)*, both project construction and post-construction operation would involve the transportation, use, and disposal of limited quantities of hazardous material such as paints, solvents, adhesives, fuels, lubricants, grease, and asphalt. Employees may be exposed to hazardous materials during construction. Exposure of construction/operational workers, the public, or the environment to contaminated materials can be minimized by implementing the measures required by federal, state, and local laws and regulations including, but not limited to the regulatory requirements listed herein, SC-HAZ-1 through SC-HAZ-5, the potential impacts to the public or environment would be less than significant. The potential for the release of hazardous materials during project construction is considered low, and if a release was to occur, it would not result in a significant hazard to the public, surrounding land uses, or the environment due to the small quantities of materials being used at the site. Therefore, the short-term construction impact would be less than significant. No mitigation would be required.

According to DTSC's EnviroStor and SWRCB's GeoTracker, the project site is not a hazardous materials site. The project would not be located on a site included on any list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. Additionally, it is anticipated that all potentially hazardous materials that are currently being stored at the properties will be removed before the construction of the EBMF (SC-HAZ-1). Therefore, the impacts related to foreseeable or accidental release of hazardous materials is less than significant.

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?*

Reference: L.A. CEQA Thresholds Guide (Section F.2); NavigateLA.

Comment: A significant impact may occur if the proposed project were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which pose a hazard beyond regulatory thresholds.

Less than significant impact. There are existing or proposed schools within a one-quarter mile (0.25 miles) of the project site, including

- Animo James B. Taylor Charter Middle School, located directly east of the project site
- Kedren Head Start (preschool), located directly west of the project site
- 109th Street Elementary School (10915 McKinley Avenue), located 0.11 miles to the north-northwest
- Animo Locke College Preparatory Academy Blue and Dot Green Public Schools (both at 325 East 111th Street), located 0.25 miles to the west

As discussed above in *CEQA Analysis question (a)*, both the construction of the proposed EBMF and post-construction operations would involve the transportation, use, and disposal of limited quantities of hazardous material such as paints, solvents, adhesives, fuels, lubricants, grease, and asphalt. The project would not involve the transportation, emission or handling of hazardous or acutely hazardous materials that could result in a danger to a nearby school. Because such activities would comply with applicable federal, state, and local regulations, including, but not limited to the regulatory requirements listed herein, SC-HAZ-1 through SC-HAZ-5, the potential project impacts to nearby schools would be less than significant. Thus, no mitigation would be required.

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 it create a significant hazard to the public or the environment?*

Reference: L.A. CEQA Thresholds Guide (Section F.2); DTSC EnviroStor Data Management System; SWRCB's GeoTracker.

Comment: California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste. Currently, the Cortese List consists of the following:

- Sites listed on the DTSC Envirostor database
- LUST sites on the SWRCB's Geotracker database

- Solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit as identified by SWRCB
- “Active” Cease and Desist Orders (CDO) and Cleanup and Abatement Order (CAO) from SWRCB
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 for the Health and Safety Code as identified by DTSC

A significant impact may occur if the proposed project were included on an agency list of un-remediated hazardous or contaminated sites.

Less than significant impact. The proposed project would not be located on a site included on any list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. The project site is not on the Cortese List, however, there are nearby facilities that are on the Cortese List. Construction near a site on the Cortese List is not necessarily an impact that would create a significant hazard to the public or the environment. Due to the nature of the proposed construction, only soils adjacent to possibly contaminated soils would be disturbed and these soils are not necessarily contaminated because of their vicinity to a contaminated site. The following sites are located close to the project site and are listed on the Cortese List according to CalEPA, the LA RWQCB, and the DTSC:

- **WR Admin & Truck Yard:** According to SWRCB’s Geotracker, this site, located at 850 111th Place, approximately 647 feet east-northeast of the proposed project site, has an active permitted for an underground storage tank (UST). The permitting agency is the LACFD (Permit #FA0038754). The facility is identified as a generator/hauler of solid waste and as an active industrial facility that treats and/or disposes of liquid or semisolid waste. The type of waste is not reported. Construction of the EMBF is not anticipated to affect this UST site, nor pose an environmental hazard related to hazardous materials used at this facility.
- **Lanzit Project:** According to SWRCB’s Geotracker, Lanzit Project (former Caltrans Site) is listed as a WDR site (WDR100001910) located at 930 East 111th Place, approximately 787 feet (ft.) east-northeast of the EBMF project. The Lanzit Project site operated as a Caltrans facility between 1947 and 1991. Since 1991, several subsurface investigations and subsequent remedial actions have been completed. The site has been identified to have soil, groundwater, and soil vapor impacted with total petroleum hydrocarbons (TPH) and several volatile organic compounds (VOCs, including trichloroethylene (TCE). Several sources were identified, including a 550-gallon UST. The facility remained listed as a Leaking UST (LUST) cleanup site with an ‘Open-Case Begin Date’ status as of September 1990 and an ‘Open-Remediation’ status as of August 2011. In October 2011, a general WDR permit was issued by the Executive Officer of this Regional Board (Order No. R4-2007-0019, CI No. 9760, Series No.176) to inject 30 Microemulsion (3DMe) and a hydrogen release compound (HRC) primer solution to mitigate volatile organic compounds

(VOCs) contamination in the groundwater. Between November 2011 and August 2012, two injection events were conducted at the site. The last injection was completed in August 2012. A total of 78,400 pounds of 3DME solution and 10,135 pounds of HRC primer were injected into the subsurface. Groundwater near the Lanzit Project site is approximately 60 to 65 ft bgs with a gradient of 0.001 feet per foot to the north-northwest, putting the EBMF project site cross gradient. Additionally, construction of the EBMF is not anticipated to involve soil excavation that will expose contaminated groundwater. Construction of the EBMF is not anticipated to affect this WDR site, nor will the construction of the project pose an environmental hazard related to hazardous materials on the public or environment.

Exposure of construction and operational workers to contaminated materials can be minimized by implementing the measures required by federal, state, and local laws and regulations, including, but not limited to SC-HAZ-1 through SC-HAZ-5. As such, potential impacts associated with the excavation of contaminated materials would be less than significant. Therefore, the project's design, the implementation of regulatory requirement listed herein, and adherence to federal, state, and local laws regarding hazardous materials sites would ensure that the project's impact would be less than significant.

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 for people residing or working in the project area?

Reference: L.A. CEQA Thresholds Guide (Section F.1); City of Los Angeles General Plan, including Southeast Los Angeles Community Plan; Los Angeles County, Department of Regional Planning, Airport Land Use Commission.

Comment: A significant impact may occur if the proposed project site were located within a public airport land use plan area, or within 2 miles of a public airport, and would create a safety hazard.

No impact. The closest public airport is Hawthorne Municipal Airport (also known as Jack Northrop Field) located at 12101 South Crenshaw Boulevard in Hawthorne, California (approximately 3.9 miles to the west/southwest of the EMBF project site). Additionally, the Los Angeles International Airport (LAX), located at 1 World Way in Los Angeles, California is 8.4 miles west of the EMBF project site. The project site is not located within the Airport Planning Boundary or Influence Area for these airports (ALUC, 2003, 2015). As such, no impact would occur, and no mitigation is required.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Reference: L.A. CEQA Thresholds Guide (Section F.1); City of Los Angeles General Plan, including Southeast Los Angeles Community Plan; Los Angeles County, Department of Regional Planning, Airport Land Use Commission.

Comment: A significant impact may occur if the project would result in a safety hazard for people residing or working in the project area because of its location near a private airstrip.

No impact. The project site is not located within the vicinity of a private airstrip. The closest private airstrips are Compton/Woodley Airport in Los Angeles, approximately 3.3 miles south of the project site, and the Prairie Gate at the Hawthorne Airport in Hawthorne, approximately 3.9 miles east of the project site. The site is not located within the Airport Planning Boundary or Influence Area for these private airstrips (ALUC, 2003, 2015). As such, no impact would occur, and no mitigation is required.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Reference: L.A. CEQA Thresholds Guide (Section F.1); City of Los Angeles General Plan, including Southeast Los Angeles Community Plan.

Comment: A significant impact may occur if the proposed project were to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan.

No impact. The City's Safety Element has identified disaster routes used to bring in emergency personnel, equipment, and supplies to impacted areas. Disaster routes are used during times of crisis to save lives, protect property, and minimize the impact on the environment. The project site is not located on disaster routes, which include Avalon Boulevard, Imperial Highway, and Central Avenue, and do not include . This includes East 111th Place, East Lanzit Avenue, and McKinley Avenue.

The construction and operation of the project would not impact permanent access to emergency response or evacuation routes. The construction of the EBMF is not anticipated to take place on roadways mapped and listed as disaster routes. No temporary lane closures or traffic pattern modifications are anticipated on East 111th Place as most of the construction will occur on the 740 and 800 East 111th Place properties. Improvements on East 111th Place would be conducted in accordance with the Traffic Management Plan (TMP) that would maintain access to all properties and provide detours for lane closures (MM-CC-1 through MM-CC-3), as discussed in the Community Impact Assessment. Emergency access and evacuation routes would be maintained and provided during both construction and operations

As discussed above in *Section 5.0 Regulatory Setting*, the LAFD and other City agencies are implementing the appropriate emergency procedures outlined in the City's Hazard Mitigation Plan to reduce risks from disasters to people, property, economy, and the environment within the City. As the project site is not located on a public right-of-way, the project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts would be anticipated and no mitigation is required.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Reference: L.A. CEQA Thresholds Guide (Section K.2); City of Los Angeles General Plan, including Southeast Los Angeles Community Plan; Planning Department Parcel Profile Reports; NavigateLA; ZIMAS.

Comment: A significant impact may occur if the proposed project were located in a wild land area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

No impact. The project site is located within a highly urbanized area of the City and do not include wildlands or high fire hazard terrain or vegetation. The site is not identified by the City as being located in an area susceptible to fire hazards and according to ZIMAS, the project site is not within Very High Fires Hazard Severity Zones (VHFHSZ). The project involves the demolition of the existing buildings, followed by the construction of several EBMF buildings and structures, and does not propose any alteration that would exacerbate the risk of wildfire. Furthermore, the project does not involve the construction of structures in which people would reside or recreate. Therefore, the project would not subject people or structures to a significant risk of loss, injury, or death because of exposure to wildland fires. No impacts would occur, and no mitigation is required.

6.0 RECOMMENDED MEASURES

Standard Conditions

The following Standard Conditions shall be implemented, as standard measures for compliance with existing regulations:

SC-HAZ-1: All hazardous materials and wastes shall be handled and disposed of in accordance with applicable regulations, including South Coast Air Quality Management District (SCAQMD) Regulations.

SC-HAZ-2: Workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with Occupational Safety and Health Administration (OSHA) Hazardous Waste Operation Standards (29 CFR 1910.120), and Cal-OSHA “Hazardous Waste Operations & Emergency Response” (HAZWOPER) (8 CCR 5192). The Contractor, qualified subcontractor, or an industrial hygienist shall prepare a site-specific health and safety plan. The plan shall appoint a site safety officer and establish responses to contaminants, including methane gas, known to exist in the area based on the site knowledge and the Phase II Environmental Site Assessment (ESA) and Additional Site Assessment Report.

SC-HAZ-3: Soils that have visible staining or an odor shall be tested in the field by the Contractor or qualified environmental subcontractor with an organic vapor

analyzer (OVA) for volatile components, which require additional considerations in their handling and disposal. Soil with OVA readings exceeding 50 parts per million (ppm) volatile organic compounds (probe held 3 inches from the excavated soil face), or which is visibly stained or has a detectable petrochemical odor shall be stockpiled by the Contractor separately from non-contaminated soils. If volatile compounds are present at concentrations exceeding 50 ppm, the South Coast Air Quality Management District (SCAQMD) Rule 1166 permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution.

SC-HAZ-4: Any contaminated material (i.e., soil, asphalt, concrete, railroad ballast, trash fill, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or non-hazardous waste under all criteria by both State and Federal Codes before disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will be prepared by the Contractor or its qualified representative, and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation or is not needed on the site, a less costly nonhazardous transporter and soil recycling facility shall be used if no hazardous constituents are present above their respective action levels.

SC-HAZ-5: In accordance with South Coast Air Quality Management District (SCAQMD) Rule 1403, a pre-demolition building survey for asbestos-containing materials (ACMs) is required before demolition. Therefore, a pre-demolition survey is recommended for ACMs, lead-based paint, polychlorinated biphenyl (PCB), and other hazardous materials before any on-site demolition.

Mitigation Measures

Based on the analysis above, mitigation measures to reduce the significant adverse impacts pertaining to hazardous materials associated with the implementation of the proposed project include:

MM-HAZ-1: Additional site characterization to identify the lateral and vertical extents of tetrachloroethene (PCE) impacted soil vapor and assess if groundwater beneath the site has been impacted shall be conducted. Following completion of site characterization, the City of Los Angeles shall report the "unauthorized release" to the appropriate agency for regulatory oversight. Once a case is opened, the City of Los Angeles shall comply with any additional characterization activities and subsequent remedial actions to the satisfaction of the regulatory oversight agency to protect construction workers, facility workers, and neighboring residences from exposure to impacted media (i.e. soil, groundwater, and/or soil vapor).

MM-HAZ-2: Before construction, a Soil Management Plan (SMP) shall be developed to provide construction workers with guidelines from a health and safety perspective (e.g., use of personal protective equipment, action levels, etc.) on handling impacted media that is encountered during any subsurface disturbance activities. The SMP shall describe site- and project-specific protocol to be followed in the event of encountering chemically impacted soil. The SMP shall also facilitate excavation activities by having a structured plan in place for the handling, characterization, and disposal of impacted soil wastes.

MM-HAZ-3: Additional measures, as recommended in the Phase II Environmental Site Assessment (ESA) and/or the additional Site Characterization to be performed for the project site, shall be taken to protect the proposed facility's workers. These measures may include, but are not limited to:

- All stored chemicals, equipment, underground storage tanks (USTs), and waste/debris shall be removed from both properties before purchase. Once removed, a pre-acquisition inspection should be performed to confirm the removal of all hazardous materials and other solid and liquid wastes stored on the properties.
- Due to the contaminant plume potentially extending offsite, consultation with legal counsel is needed to determine if notification to the Los Angeles Regional Water Quality Control Board (LARWQCB) of the potential unauthorized release is warranted. Should a case be opened with the LARWQCB, additional action may likely be required, including detailed site characterization, active remediation, and the designation of a responsible party.
- Measures (i.e., engineering controls such as vapor barriers) shall be installed within new construction, to address residual impacts of tetrachloroethene (PCE) in soil vapor in the event remediation is not pursued or completed. These measures typically consist of the installation of either an active or passive venting system and/or the application of a vapor barrier that is chemically resistant to chlorinated solvents..

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