
IV. ENVIRONMENTAL IMPACT ANALYSIS

F. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section summarizes the results of four Phase I Environmental Site Assessments (ESAs) prepared for the various properties at the Project Site. A Phase I ESA is a report that provides a detailed description of the history of uses at a given site, the building materials used at the site, and the potential existence of hazardous materials at a site and in the vicinity of a site. The Phase I ESAs prepared for the Project Site included an assessment of the individual properties, interviews with facility personnel for the apartment complex, and a review of historical records to evaluate the potential for hazardous substances or contamination at each property. The full ESAs are included in Appendix F of this EIR.

The ESA reports, corresponding addresses and preparation dates are as follows:

- SECOR International, Inc., 5601 Santa Monica Boulevard (Site I), northeast corner of St. Andrews Place and Virginia Avenue (Site II), and the southeast corner of St. Andrews Place and Virginia Avenue (Site III), Los Angeles, California, August 13, 1998.
- DCI Environmental Services, 5637 Santa Monica Boulevard, Los Angeles, California, May 31, 2001.
- Altec Testing and Engineering, Inc., 5643 and 5647 Santa Monica Boulevard, Los Angeles, California, November 1, 2001.
- Altec Testing and Engineering, Inc., 5661 and 5667 Santa Monica Boulevard, Los Angeles, California, November 8, 2001.

A Phase I ESA was not provided for the property located at 5653-5657 Santa Monica Boulevard. This property is located in the middle of the Project Site. Aerial photographs indicated that the property usage is consistent and the ages of buildings are similar throughout the site. Therefore, the impacts and mitigation measures associated with the other properties are considered to be applicable to this property as well.

ENVIRONMENTAL SETTING

Existing Project Site Development

The Project Site consists of three properties with 161,550 sq. ft. of retail development and surface parking on Site I, surface parking on Sites II and III with temporary trailer on Site II. All three sites total 208,320 sq. ft. or 4.7 acres.

On Site I, the earliest retail building, the 3-story (above grade) department store building that currently occupied by Sears (5601 Santa Monica Boulevard), was initially developed in the mid to late 1920s. The exact date of construction is currently unknown as conflicting dates of construction are identified in the applicable ESA. This 3-story building is constructed of reinforced concrete and steel frame with a brick and stucco exterior. It has been occupied by Sears, Roebuck and Company since its original construction.

The other five buildings were developed in the late 1930s, 1940s and 1950s. These properties had been utilized for residential uses prior to their retail/commercial development. The buildings are constructed of brick masonry with concrete slabs. One building is divided into two tenant occupancies (5643 and 5647 Santa Monica Boulevard). One building is occupied by two tenants, one at 5661 Santa Monica Boulevard and one at 5665 Santa Monica Boulevard. There is a vacant space at 5663 Santa Monica Boulevard. This building has three addresses (5661, 5663 and 5665 Santa Monica Boulevard) associated with it, as it is divided into three separate tenant spaces. The address of 5661 Santa Monica Boulevard for the entire building will be referred to by this address throughout this section.

The Sears Automotive Service Center is located at 5667 Santa Monica Boulevard. City of Los Angeles Building Department records indicate a portion of the existing building was constructed in 1936, and was permitted as a store and auto service center. Sears, Roebuck and Company purchased the property in 1952, and altered the facility to include the remaining existing structures. Therefore, this property has been utilized as an automotive service center since 1936.

The remaining portion of Site I, located along the northern side of Santa Monica Boulevard, is asphalt covered and utilized as surface parking areas for the retail/commercial businesses.

Site II is located at the northeast corner of St. Andrews Place and Virginia Avenue; and Site III is located at the southeast corner of St. Andrews Place and Virginia Avenue. Neither property has any permanent structures; however, a trailer was parked at the northeast corner of Site II. This property was being utilized as a day laborer workstation at the time of the site assessment. A chain link fence enclosed Site II, while a 3-foot concrete block wall enclosed the north, east and west borders of Site III.

Site Reconnaissance

Hazardous Materials/Petroleum Products Storage and Handling

Visual observation for the use and/or storage of hazardous materials and petroleum products was performed.

The ESA's identified small quantities of paints, household cleaning supplies and maintenance products at the buildings corresponding with addresses 5643, 5647, 5661, and 5667 Santa Monica Boulevard. Material Safety Data Sheets were not identified for the products; however, material safety information is available on the container labels. The Sears Automotive Site at 5667 Santa Monica Boulevard previously contained two 5,000-gallon underground storage tanks (USTs) that were removed in 1986.¹

The 3-story (above grade) department store, currently occupied by Sears, offers a variety of products for retail purchase, including garden supplies, paint and paint-related products, and has a photography department. The retail products were observed in their sealed original containers, which provide material safety information on the container labels. The ESA did not specify whether the photography department offered on-site photo development service, which would require chemicals for photo development. This location has a basement with one aboveground storage tank (AST). The AST was reported to contain hot water. Two steel covered trenches were observed during the ESA that housed piping extending from pumping equipment to the boilers.

One 55-gallon metal drum was identified at the 5637 Santa Monica Boulevard address. According to the ESA, the drum belonged to a neighboring property and contained adhesive glue material. The drum was unopened and the product appeared to be new. Evidence of illegal dumping was not identified in the ESA report and no other chemicals or chemical containers were observed on site.

A retail gift shop operates at 5661 Santa Monica Boulevard. At the time the ESA for 5661 Santa Monica Boulevard was prepared, the ESA reported that chemicals and products observed to be used and stored on site included: disinfectants, antiseptics, prescription and non-prescription drugs, and x-ray processing and development chemicals. The x-ray development system was located on site in a small room. Several different film developers and fixers chemicals were stored within this room in quantities that totaled less than 55-gallons. The area beneath the sink associated with this system and walls adjacent to the area beneath the sink were stained with chemical residue indicating spillage had occurred. Although some spillage appears to have occurred, the potential impact appears to be limited. The medical use ceased to operate several years ago.

¹ *Hanks Service Station Maintenance, Inc., documentation, 1986.*

There were many different chemical products observed in association with the use at 5667 Santa Monica Boulevard (occupied by Sears Automotive Service Center). Three aboveground storage tanks, one suspected underground storage tank, nine hydraulic lifts, and one multi-stage wastewater clarifier are located at the property. Chemical products observed for retail purchase included: oil, transmission fluid, antifreeze, lubricants, grease and batteries. Chemical products observed for the maintenance and operation of the service center included: waste oil, waste antifreeze, solvent parts cleaner, brake cleaner, hydraulic fluid, used oil filters, and welding gases. A battery storage room was located at the northeast corner of the building. According to the ESA, the floor area within this room was observed to be stained and indicated a build-up of oil and other chemical residues. A storage area was observed to contain 55-gallon drums of segregated used oil filters, waste oil and waste antifreeze. Some of the drums were unlabeled, and the asphalt surrounding the drums was observed to be stained from oil/chemical spillage. Nine hydraulic lifts were observed within the service bays along the west side of the building. Evidence of excessive leakage was not observed for any of the lifts and the onsite manager reported that no mechanical repairs or replacement to any of the lifts had occurred. Surplus hydraulic fluid was not observed to be stored at the property.

During the site visit by SECOR, chemicals were not observed at the Site II location. However, small quantities of used motor oil were abandoned on a small grass area along the northern property border of Site III. Motor oil staining was observed on the asphalt paved parking areas. The amount of staining was limited and is unlikely to present a concern.

Waste Generation, Treatment, Storage, and Disposal

Visual observation for the generation, treatment, storage and disposal of wastes was performed.

The ESAs prepared for the 3-story department store (currently occupied by Sears) and 5637 Santa Monica Boulevard addresses identified solid waste disposal containers at each of these properties. No excessive odors, or overflowing or excessive ground trash were noted in the vicinity of the dumpsters. No hazardous, regulated or medical wastes were noted in the dumpsters. No further action or investigation is recommended regarding wastes at the Project Site.

The United States Environmental Protection Agency (USEPA) prepares a list of small and large quantity hazardous waste generators in accordance with the Resource Conservation and Recovery Act (RCRA). According to the ESA prepared by SECOR, the Sears Department Store was listed as a small quantity hazardous waste generator. However, the existing operations at the Sears retail store are unlikely to have an adverse effect on the site. The 5667 Santa Monica Boulevard building (occupied by the Sears Automotive Service Center) was not identified as a hazardous waste generator.

Polychlorinated Biphenyls (PCBs)

Electrical transformers, hydraulic equipment capacitors, fluorescent light fixtures, and similar equipment may contain polychlorinated biphenyls (PCBs) in the hydraulic fluids or dielectric insulating fluids within the units. The federal Toxic Substances Control Act (TSCA) generally prohibited the domestic manufacture of PCBs after 1979. However, there is the potential that dielectric fluid in electrical and hydraulic equipment manufactured and installed prior to that date may contain PCBs.

Electrical transformers were identified throughout the Project Site. One concrete pad-mounted transformer was identified adjacent to the loading dock alongside the northeast side of the 3-story department store building. Visible signs of leakage or spillage were not observed. The City of Los Angeles Department of Water and Power reportedly owned this transformer. One dry transformer was observed inside the building. Dry power transformers do not contain dielectric fluids. Therefore, a concern is not presented.

Several small transformers were observed behind the 5637 Santa Monica Boulevard property. Visible signs of leakage or spillage were not observed on the transformer bases. Tenant buildings located at 5643, 5647, and 5661 and 5667 Santa Monica Boulevard are supplied with overhead electrical service from pole-mounted transformers located along an alley transecting the subject property.

Fluorescent light fixtures were observed within the buildings located at 5643, 5647, 5661, and 5667 Santa Monica Boulevard. Leaks and/or spills associated with the light ballasts were not observed. The fluorescent light fixtures were not included in the ESAs for the subject buildings located at 5601 and 5637 Santa Monica Boulevard. Based on the pre-1979 construction date of all the subject buildings located at the Project Site, it is likely that the light ballasts utilize PCB-containing dielectric fluids. Additionally, some of the fixtures were observed to use mercury-containing fluorescent bulbs. The bulbs require special handling and disposal practices due to the mercury content.

Asbestos-Containing Materials (ACMs)

Based on age of the buildings, asbestos-containing materials (ACMs) are likely to be present. Asbestos sampling surveys have been conducted for some of the subject buildings; however, the results were not presented in the ESAs provided for review.

Radon Gas

Exposure to radon gas has been attributed to an increased risk of lung cancer. Typically, buildings with basements located in colder climates over granite-rich soil are prone to increased levels of radon gas. The subject property is not located in a high-risk radon gas zone. The 3-story department store building has a basement foundation. The remaining five buildings have concrete slab foundations.

According to data compiled by the USEPA, 69 houses were sampled for radon gas levels in Los Angeles County through December 1993. The USEPA's recommended action level for radon gas is 4.0 picoCuries per liter, and the average radon gas concentration was identified at 0.7 picoCuries per liter. Los Angeles County was identified within a Low Radon Potential area. Based on this propensity, sampling for radon gas was not conducted as part of the ESAs and no further action or investigation was recommended regarding radon gas levels at the Project Site.

Lead-Based Paint (LBP)

Based on age of the buildings, lead-based paint (LBP) is likely to be present. Paint samples were collected and analyzed for lead content for some of the subject buildings; however, the results were not presented in the ESAs provided for review.

Facility Storage Tanks and Pipelines (above or below ground)

The 3-story department store building contains a basement with one AST. The California Office of Environmental Information maintains an inventory of registered USTs and ASTs. The 3-story department store building was listed as containing one unknown UST. Two steel covered trenches were identified during the ESA that house piping extending from pumping equipment to the boilers.

Two subsurface structures were also identified in the basement of the 3-story department store building. The structures were partially filled with water and are most likely associated with the sewer system. Construction plans reviewed by SECOR identified the structures as an ejector and blow off basin.

The building located at 5667 Santa Monica Boulevard (currently occupied by Sears Automotive Service Center) contains three ASTs, one suspected UST, and one multi-stage wastewater clarifier. One 1,000-gallon AST containing waste oil, and two 500-gallon ASTs containing product oil were observed. The condition of the ASTs and whether staining was observed from previous spills was not identified in the ESA report. One possible UST was observed by Altec to have been abandoned in place in the tire room. Information regarding this UST or the presence of any USTs, past or present, located at the site was not identified in LAFD records. One multi-stage wastewater clarifier was observed in the battery storage room.

Surface Areas

Visual observation of the Project Site identified oil/chemical stained areas of asphalt pavement in storage areas located at 5667 Santa Monica Boulevard (occupied the Sears Automotive Service Center).

Small amounts of used motor oil were identified to be abandoned on a small grass area along the northern border of Site III. Based on the limited amount of release observed, it is unlikely that a concern was presented.

Visible evidence of on-site surface impoundment facilities, pits, or dry wells was not observed at the Project Site. Surface water features were not observed at the Project Site, including any evidence of lagoons, ponds or other bodies of water.

Parking facilities consist of asphalt-paved surface parking areas and street parking. Minor oil discharges were observed on the parking areas; however, the discharges are incidental in nature and corrective action is neither practical nor warranted.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Based upon criteria established in the City of Los Angeles Draft L.A. CEQA Thresholds Guide, the Project would result in a significant impact to hazards or hazardous materials if:

- (a) The Project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation).

Project Impacts

Accidental Explosion or Release of Hazardous Substances

Demolition and Construction

Soils

Based on the nature of the automotive service business, the length of time in operation, the types of chemicals handled on site, and storage tanks used for the various chemicals, the potential exists for underlying soils to contain hydrocarbons. Due to the staining and chemical residue around and under the sink in the x-ray development room in the 5661 Santa Monica Boulevard location, the potential exists for the underlying soils to contain hazardous chemicals. Hydrocarbons and hazardous chemicals in soils present a potential significant impact to the environment as they can emit these pollutants into the air or surface water runoff when disturbed during construction activities. They could also leach into underground aquifers causing contamination to ground water supplies, and permanent damage to the aquifer. Soil sampling and analysis would be required to identify the presence of hydrocarbon or other hazardous chemicals in the soil. If contamination is present, the affected soils would need to be removed and disposed

of according to the appropriate federal and State regulations. Once the affected soils are removed, the environmental impacts would be less than significant.

Polychlorinated Biphenyls (PCBs)

Based on the age of the structures, the potential exists for the pad-mounted and pole-mounted transformers, and fluorescent light ballasts to contain PCBs. Exposure of workers and underlying soils to PCBs during the demolition of the Project Site structures would be a significant impact. A qualified PCB abatement contractor would be required to comply with applicable state and federal rules and regulations governing PCB removal and disposal. Provided that removal and disposal rules and regulations are followed, hazardous materials impacts caused by exposure to PCBs would be less than significant.

Asbestos-Containing Materials (ACMs)

Demolition of the five commercial buildings and associated asphalt-paved parking areas on site, which were built prior to the ban on use of asbestos as building insulation, could release asbestos-containing materials present in the structures. Exposure to workers to ACMs during demolition or renovation of the Project Site structures would be a significant impact.

Prior to the demolition activities, a complete asbestos survey will be conducted to identify all sources of asbestos. This activity is required by the USEPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation and the South Coast Air Quality Management District's (SCAQMD's) Rule 1403. Bulk samples of all materials which are suspected of containing asbestos will be collected and analyzed for asbestos content. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished.

In accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials, which are identified as ACMs would be removed by a trained and licensed asbestos abatement contractor. The asbestos removal operations would be conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. The contractor selected for the removal process would be chosen based on experience, reputation, and relationship with local agencies such as SCAQMD and OSHA regional offices.

Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The SCAQMD has very specific regulations for asbestos emissions. Provided the removal and disposal of ACMs from the Project Site follows the various required guidelines described above, hazardous materials impacts relative to exposure to asbestos would be less than significant.

Lead-Based Paint (LBP)

Based on the age of the structures, the potential exists for such structures to contain lead-based paint. Exposure of workers to lead paint during demolition or renovation of the Project Site structures would be a significant impact. A qualified lead-paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing lead paint abatement. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Provided that abatement rules and regulations are followed, hazardous materials impacts caused by exposure to lead-paint would be less than significant.

Operation

The Proposed Project is not anticipated to result in a substantial release of hazardous materials into the environment. The Project would utilize limited quantities of common cleaning and maintenance materials, which would be shipped, stored, used and disposed of in accordance with applicable statutes. All land uses and materials would be in accordance with City zoning and local, state, and federal regulations. Based on the amount stored, nature of packaging, materials involved, and the Proposed Project's required compliance with applicable regulations, the risk from use of these materials is considered to be low. Therefore, accidental conditions involving the release of hazardous materials into the environment during Project operation is considered to be less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project and the related projects could result in potentially cumulative hazardous materials impacts resulting from: a) the use, storage or generation of hazardous substances; and b) the proximity of the Proposed Project Site and related projects to existing facilities which use, store, or generate hazardous materials. There are a total of 45 related projects within a 2-mile radius of the Project Site. Based on the distance between the related projects and the Proposed Project Site; existing regulations regarding the use, storage, transport, and disposal of hazardous materials; laws governing underground storage tanks; and the location of the related projects; impacts of the Proposed Project and related projects are not cumulatively considerable, and therefore, are less than significant.

MITIGATION MEASURES

Code Required

- F-1 Prior to the issuance of the demolition permits, the Applicant shall have all USTs and associated piping/equipment identified at the Sears Automotive Service Center and removed under a proper Los Angeles City Fire Department Permit. The soils underlying the USTs and associated

pipng/equipment shall be assessed for the presence of hydrocarbons to determine whether soil contamination has occurred. If soil contamination is identified, proper abatement procedures shall be conducted according to Los Angeles Fire Department, federal, State and other local regulations to remove or remediate the contaminated soils.

- F-2 Prior to the issuance of the demolition permits, the Applicant shall have soils under heavily stained asphalt pavement at the Sears Automotive Service Center shall be assessed to determine whether soil contamination exists. If soil contamination is identified, the Applicant shall have the soils properly removed or abated according to the Los Angeles Fire Department and applicable federal, State and other local regulations.
- F-3 Prior to the issuance of demolition permits, the Applicant shall have the ASTs located at the Sears Automotive Service Center properly removed for disposal at an appropriately licensed facility. The ASTs shall be cleaned, degassed and removed. Soils located underneath the ASTs shall be assessed to determine whether any soil contamination has occurred. If soil contamination is identified, proper abatement procedures shall be conducted to remove the contaminated soils according to the Los Angeles Fire Department and applicable federal, State and other local regulations.
- F-4 Prior to the issuance of demolition permits, the Applicant shall have the soils located adjacent to or near the multi-stage wastewater clarifier, and under any areas of oil/chemical-stained pavement at the Sears Automotive Service Center, inspected for staining, collected and analyzed for the presence of hydrocarbons. If soil contamination is identified, proper abatement procedures shall be conducted to remove the contaminated soils according to the Los Angeles Fire Department and applicable federal, State and other local regulations.
- F-5 Prior to the issuance of demolition permits, the Applicant shall have the small transformers observed behind the 5637 Santa Monica Boulevard property tested for the presence of PCB-containing dielectric fluids. If PCBs are identified, the dielectric fluid shall be collected and properly disposed of as hazardous waste at an appropriate disposal facility in accordance with applicable federal, state and local regulations. The transformers shall also be disposed of as hazardous waste in accordance with applicable federal, state and local regulations.
- F-6 Prior to the issuance of demolition permits, the Applicant shall have the pole-mounted transformers located along the alley transecting the Project Site tested for the presence of PCB-containing dielectric fluids. If PCBs are identified, the dielectric fluid shall be collected and properly disposed of as hazardous waste at an appropriate disposal facility in accordance with applicable federal, state and local regulations. The transformers shall also be disposed of as hazardous waste in accordance with applicable federal, state and local regulations.

- F-7 Prior to the issuance of demolition permits, the Applicant shall identify PCB-containing light ballasts in each building throughout the Project Site. These ballasts shall be recycled through a reputable company to prevent environmental contamination upon renovation, demolition or change-out.
- F-8 Prior to the issuance of demolition permits, the Applicant shall identify all mercury-containing fluorescent bulbs used in light fixtures throughout the buildings on the Project Site. These bulbs shall be recycled through a reputable company to prevent environmental contamination upon renovation, demolition or change-out.
- F-9 Prior to the issuance of the demolition/renovation permits, the Applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403, as well as other state and federal regulations. Specific requirements of Rule 1403 include:
- Implementation of a thorough survey of the affected facility prior to issuance of permits for any demolition or renovation activity, including inspection, identification, and quantification of all friable and certain non-friable asbestos-containing materials.
 - Surveys which include collection and analyses of representative asbestos building material samples, and quantification of these materials for asbestos abatement purposes prior to or during demolition/renovation.
 - Notification of the SCAQMD of the intent to demolish or renovate any facility at least ten days prior to commencing with the activity.
 - Removal of all asbestos-containing materials prior to any demolition or renovation activity that would break up, dislodge, or similarly disturb the material.
 - Use of legally required procedures when removing asbestos-containing materials.
 - Placement of all collected asbestos-containing materials in leak-tight containers or wrapping.
 - Disposal of asbestos-containing materials as required by applicable regulations.
- F-10 Prior to issuance of permits for any demolition/renovation activity involving a particular structure, a lead-based paint assessment of each existing apartment structure shall be conducted. Lead-based paint found in any buildings shall be removed and disposed of as a

hazardous waste in accordance with all applicable regulations. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the code required mitigation measures, Project impacts associated with hazards and hazardous materials would be less than significant.