
IV.F. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section incorporates the results of an asbestos study prepared for the project site by Christo & Ganesh-M, Inc. on April 24, 2003 and an Engineering Observation Report prepared by Robert Mayer, Structural Engineer on May 18, 2003. The full reports are included in Appendix F of this EIR.

ENVIRONMENTAL SETTING

Project Site

The project site consists of a single lot containing 1.43 acres. The project site is currently occupied by the remains of a vacant single-family structure, several sheds/shacks in various states of disrepair and Los Angeles Cultural-Historic Monument No. 184; "Tower of Wooden Pallets" (see Figure II-4, Views of the Project Site, Views 1 and 2). The project site structures are vacant and not maintained. It is presumed that the single-family structure is built on a single concrete slab foundation and the majority sheds/shacks are also built upon a similar slab foundation, although some may be in direct contact with the ground. The Tower of Wooden Pallets has no foundation. It is constructed of wooden fork lift pallets placed directly on the ground, stacked in a brick-like fashion to a height of approximately 22 feet. The project site is bare dirt and overgrown weeds and shrubs. Disused junk and garbage is scattered over the entire site, ranging from rusted out cars and a tram, to clothes and furniture.

Hazardous Materials/Petroleum Products Storage and Handling

As the project site is currently unoccupied and not maintained, is unlikely that there is ongoing use or storage of hazardous materials. However, given the quantity of debris all over the project site it is probable that waste products and trash either remain on the site from previous use, or have been dumped on it in the past. Also several archaic canisters of solvents, cleansers and sundry chemical compounds have been observed on the project site.¹ These hazardous products and canisters may have degraded, leaked or spilled. In addition, fluids and materials from several abandoned vehicles, including a tram, may pose a hazard to people working on the project site.

Waste Generation, Treatment, Storage, and Disposal

The existing project site is not involved in the official treatment, storage or disposal of hazardous, regulated, or medical wastes. As the project site is currently unoccupied no trash is generated.

¹ Refer to *Tower of Wooden Pallets Initial Study, Case No. ENV 2003-0742, City of Los Angeles, 4 November, 2003.*

However, the project site contains a large quantity of trash and debris which spills over on to the adjacent sidewalk, at the main entrance to the site; there is an overflowing City trash receptacle.

Asbestos-Containing Materials (ACMs)

An asbestos survey was performed on April 15, 2003 by Christo & Ganesh-M, Inc. Twenty-two bulk samples were taken from the site and analyzed for ACMs. Small amounts of Chrysotile asbestos were found throughout the single-family structure and the sheds/shacks on the project site. As a result of these findings, all ACMs were removed from the project site. A Final Air Clearance procedure conducted on April 30, 2003 indicated that after the removal of all ACMs from the project site the concentration of fiber levels are below acceptable standards. With regard to ACMs, the single-family structure on the project site was deemed, "cleared for re-occupancy." No further action or investigation is recommended regarding ACMs at the project site.

Radon Gas

Review of the USEPA's Radon Map for Los Angeles County, California, indicated that the project site is located in Zone 2, an area with a predicted average indoor radon screening level between 2 and 4 pCi/L (picoCuries per liter of air). The USEPA uses 4.0 pCi/L as an action level at which remedial action is recommended. Based on this information, it is not anticipated that the average radon gas concentrations at the project site would be 4.0 pCi/L or greater. Based on propensity, sampling for radon gas was not conducted as part of the assessment. No further action or investigation is recommended regarding radon gas levels at the project site.

Lead-Based Paint (LBP)

Based on age of the buildings, lead-based paint (LBP) is suspected to be present. No previous reports were provided for review, and no existing O&M Programs were identified. A lead-based paint assessment of each existing structure will be required prior to demolition.

Mold

Molds can be found almost anywhere; they can grow on virtually any organic substance, as long as moisture and oxygen are present. There are molds that can grow on wood paper, carpet, foods and insulation. When excessive moisture accumulates in buildings or on building materials, mold growth will often occur, particularly if the moisture problem remains undiscovered or unaddressed. Many types of molds exist. All molds have the potential to cause health effects. Molds can produce allergens that can trigger allergic reactions or even asthma attacks in people allergic to mold. Others are known to produce potent toxins and/or irritants. Given that the single-family structure and sheds/shacks on the project site are unoccupied, not maintained and open to the elements, it is possible that mold is present. The wood

exposed to the elements is weathered, dry rotted and termite infested. It is possible that there is toxic mold within the confines of the Tower of Wooden Pallets.² This assessment does not constitute a comprehensive mold survey of the site, buildings or the wooden materials comprising the Tower of Wooden Pallets. Reported mold observations were solely based on remarks by civil/structural engineers.³

ENVIRONMENTAL IMPACTS

Thresholds of significance

Based upon criteria established in the City of Los Angeles CEQA Thresholds Guide (1998), the Project would result in a significant impact to hazards or hazardous materials if:

- The Project created a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.
- The Project created 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.
- The Project emitted hazardous emissions or handled hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Project Impacts

Demolition and Construction

Hazardous Materials/Petroleum Products Storage and Handling

Clearance of the project site may expose construction workers to hazardous materials or substances present in the trash and debris covering the project site. However, the services of properly trained and qualified hazardous waste handlers shall be used to perform hazardous waste cleanup or abatement, transportation and disposal prior to construction and appropriate protocol will be followed to ensure that construction workers are not exposed to toxic substances. Therefore, hazardous materials impacts relative to exposure to hazardous substances during disposal are less than significant.

² Refer to letter from Mr. Raymond Steinberg of Raymond E. Steinberg & Associates, Inc., Civil/Structural Consulting Engineers dated 20 May 2003 in Tower of Wooden Pallets Initial Study, Case No. ENV 2003-0742, City of Los Angeles, 4 November, 2003.

³ *Ibid.*

Waste Generation, Treatment, Storage, and Disposal

The existing project site is not involved in the treatment, storage or disposal of hazardous, regulated, or medical wastes. Therefore hazardous waste impacts relative to exposure to such wastes on-site are less than significant.

Asbestos-Containing Materials (ACMs)

Demolition of the project site structures would not release ACMs as asbestos removal and final air clearance activities have been completed. Therefore, hazardous materials impacts relative to exposure to asbestos are less than significant.

Radon Gas

Anticipated radon levels are below the action levels established by the U.S. EPA on the project site and in the vicinity of the project site. As such, no impacts are anticipated as a result of radon gas.

Lead-Based Paint (LBP)

Based on the age of the structures, the potential exists for such structures to contain lead-based paint. Exposure to workers to lead paint during demolition of the project site structures would be significant. 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.

Mold

During observations of the structural integrity of the Tower of Wooden Pallets, a structural/civil engineer exhibited signs of asthma related problem. It is possible the problem was due to unusual weeds growing on the property or due to possible mold within the confines of the wood pallets. As indicated previously, all molds have the potential to cause health effects and can produce allergens that can trigger allergic reactions or even asthma attacks in people allergic to mold. It is recommended that a survey be conducted to determine the presence of mold in the Tower of Wooden Pallets. If mold is found to be a hazardous condition on the property then remediation would be required in accordance with the recommendations of the survey. Provided that the recommended remediation guidelines are followed, hazardous materials impacts caused by exposure to mold would be less than significant.

Operation

The proposed project is not anticipated to result in a 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 5 related projects within a 1-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

1. Prior to issuance of permits for any demolition activity, a lead-based paint assessment of each existing 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.
2. The services of properly trained and qualified hazardous waste handlers shall be used to perform hazardous waste cleanup or abatement, transportation and disposal prior to construction.
3. Prior to issuance of building/demolition permits, a survey shall be conducted to determine presence of mold in the Tower of Wooden Pallets. Should a hazardous mold condition exist on the property, then the project applicant shall be required to remediate the condition in accordance with recommendations of the survey.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

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