

IV.H HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section addresses potential impacts associated with hazards and hazardous materials. The analysis includes an evaluation of the potential hazards associated with past and current uses of the Specific Plan area; the use, storage, and disposal of hazardous materials; and the potential presence of asbestos-containing materials, lead-based paint, and other potential hazardous materials within the Specific Plan area.

The analysis is based, in part, on four separate Phase I Environmental Site Assessments (Phase I ESAs) prepared by Andersen Environmental (AE) for the Specific Plan which include: 1) Jordan Downs public housing complex, 2) David Starr Jordan High School, 3) HACLA-owned 21.08-acre property adjacent to the Jordan Downs public housing complex, and 4) privately-owned properties along Alameda Street.¹ The purpose of the Phase I ESA process is to identify recognized environmental conditions associated with a property. In addition to the Phase I ESAs prepared for the Specific Plan area, AE also conducted environmental sampling and prepared a Phase II ESA for the HACLA-owned 21.08-acre property. The Phase I and Phase II ESAs referenced in this section are included as Appendix C.

Definitions

A recognized environmental condition is defined as "...the presence or likely presence of any hazardous substances or petroleum products on a property that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." This definition does not include "*de minimis* conditions that generally do not pose a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies" (ASTM, 2005).

The term "hazardous material" can have varying definitions for different regulatory programs. For the purpose of the proposed project, the term "hazardous materials" refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(K) defines hazardous materials as "...any material that because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment."²

Polychlorinated biphenyls (PCBs) are mixtures of up to 209 individual chlorinated compounds. There are no known natural sources of PCBs. PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they don't burn easily and are good insulators. The manufacture of PCBs was stopped in the U.S. in 1977 because of evidence they build up in the environment and can cause harmful health effects. Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, and old microscope and hydraulic oils.

¹Access was not granted to conduct a site reconnaissance for public and privately owned parcels; therefore knowledge of current hazardous material storage and/or handling conditions is unknown.

²Title 22 C.C.R. Section 66261.3, "Hazardous Waste"

Petroleum Hydrocarbons are the primary constituents in oil, gasoline, diesel, and a variety of solvents and penetrating oils. Because petroleum hydrocarbon products are complex mixtures of chemicals, risk assessments for these products generally focus on specific toxic constituents. The petroleum constituents of primary interest to human health have been the aromatic hydrocarbons (i.e., benzene, ethylbenzene, toluene, and xylenes), polynuclear aromatic hydrocarbons (PAHs), gasoline additives (e.g., MTBE, TBA), and combustion emissions from fuels (e.g., carbon monoxide, benzene, acetaldehyde, formaldehyde, diesel particulates).

Volatile Organic Compounds (VOCs) refers to organic chemical compounds which have significant vapor pressures and which can affect the environment and human health. VOCs are numerous, varied, and ubiquitous. Although VOCs include both man-made and naturally occurring chemical compounds, it is the anthropogenic VOCs that are regulated, especially for indoors where concentrations can be highest. VOCs are typically not acutely toxic but have chronic effects.

ENVIRONMENTAL SETTING

Prior Use of the Specific Plan Area

Current and past land uses within the Specific Plan area were identified with regard to their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials as part of the Phase I ESAs. These concerns are classified as recognized environmental conditions.

Publicly-Owned Properties

Jordan Downs Public Housing Complex and Recreation Center.³ The current Jordan Downs public housing complex and the Jordan Downs Recreation Center have been used for residential and agricultural purposes since before 1928.⁴ By 1947, this site included residential uses along the western portion with an organized housing development to the northeast and southeast. By 1953, the site was developed with the current housing development, which includes 700 attached two-story, townhouse-style residential units and ten picnic/children play areas located between the residential buildings. The Recreation Center includes two community center buildings, a building used as a daycare/preschool facility, a children's playground, picnic tables, barbecue pits, a baseball field, outdoor basketball courts, an indoor gymnasium, and a Teen Center.

David Starr Jordan High School. The site of the current Jordan High School has been used as a high school since before 1928, with the exception of the eastern portion, which was used for commercial purposes. The eastern portion of the site then was used as a lumber yard in 1928. By 1950, the eastern portion had been re-developed as a warehouse for paper and rags and an auto parts shed. From 1970 until the present, the entire site has been used as Jordan High School. The high school currently consists of 45 structures primarily in the southern portion, a parking lot in the eastern portion, and athletic fields including basketball courts, football field/track, tennis courts and a baseball field in the northern portion. The easternmost portion of the high school property fronting Alameda Street is currently occupied by a number of temporary school buildings, a gymnasium, and a surface parking lot.

HACLA-Owned 21.08-Acre Property (i.e., 9901 S. Alameda Street). HACLA owns three parcels of land totaling approximately 21.08 acres adjacent to the north and east of the Jordan Downs public housing complex. Prior to 1928 until at least 1938, this site was used for agricultural purposes. By the late 1930s

³The Phase I ESA prepared for the Jordan Downs Public Housing complex also covered the Jordan Downs Recreation Center.

⁴Andersen Environmental, *Phase I Environmental Site Assessment Report Performed at Jordan Downs Redevelopment Project Area – Jordan Downs Housing Development*, March 24, 2010.

to early 1940s, the site was developed for use as a steel mill. The site was first constructed for use by the Finkelstein Supply Company, who occupied the site until approximately 1949. By 1948, Southwest Steel Rolling Mills also began occupancy, leasing from Finkelstein Supply Company, until approximately 1976. By 1989, all structures at the site were demolished except for the structure at the northwest corner and three structures at the southeast corner. Becker Brothers Steel Supply used the site from approximately 1981 until 2000 as a steel mill facility. Other previous industrial uses also included, most notably, a World War II ammunitions assembly and storage facility.⁵ Currently, this property is vacant with an abandoned steel mill structure located at the northwest corner. A truck driving training school is will temporarily occupy the southeast corner of this property until construction of the proposed project begins. The truck driving school will consist of a temporary building, above ground planter boxes, parking lot, and aboveground utilities.

Privately-Owned Properties

The privately-owned properties within the Specific Plan area consist of three non-contiguous areas: 1) the central eastern properties, 2) the southeast corner properties, and 3) Mudtown Farms. The central eastern properties and the southeast corner properties are separated by the easternmost portion of Jordan High School that fronts Alameda Street. **Figure IV.H-1** depicts the Specific Plan area properties as described below.

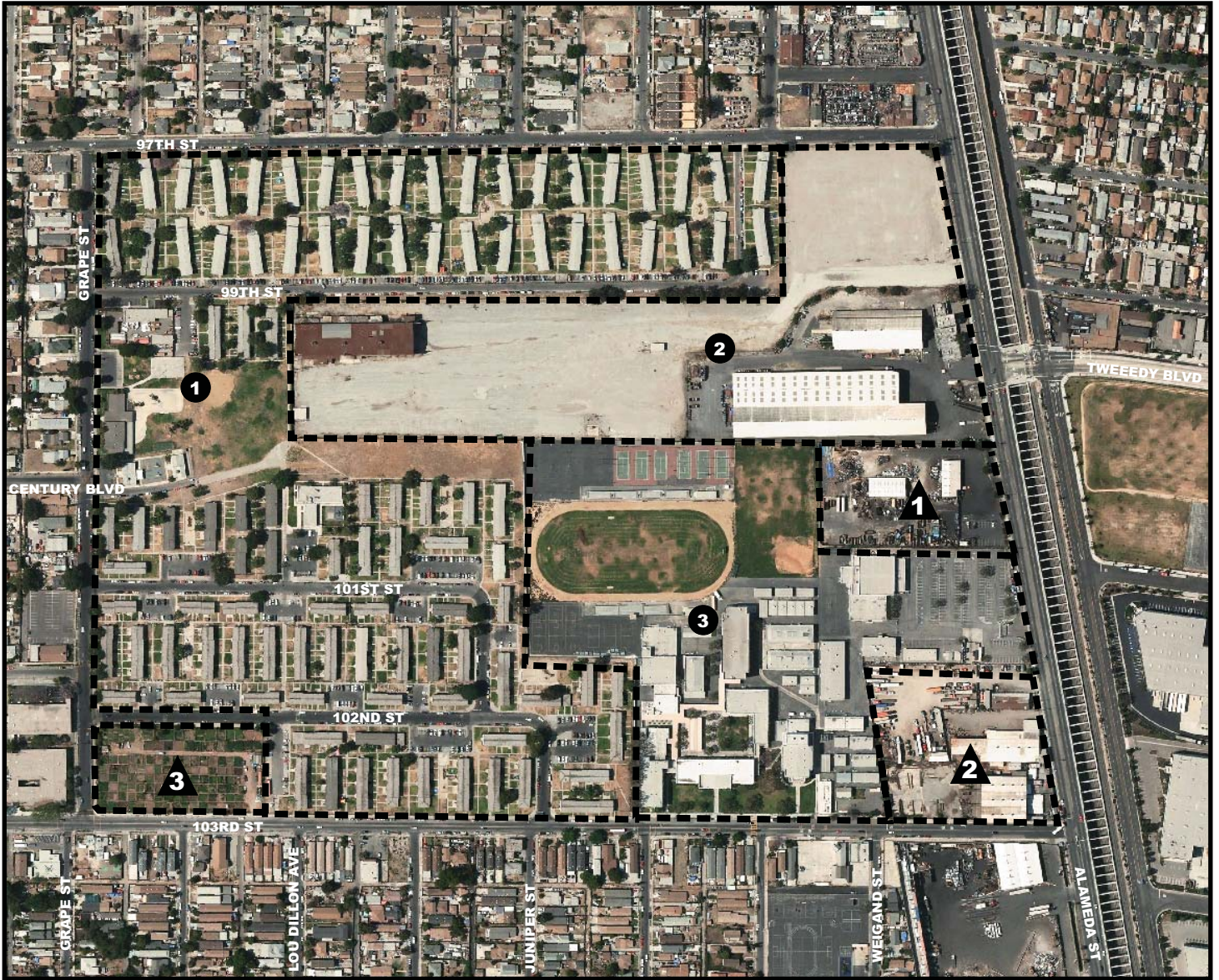
Central Eastern Properties (10019, 10035, and 10047 S. Alameda Street). Since 1928, the property has been developed for residential and auto body repair purposes. By 1947, this area was developed for use as a metals recycling center, occupied by Atlas Iron & Metal Company. From 1958 until 1962, LA Smelting Company, Super Refined Metals Company, and Electric Babbit Metals Company also operated within the property. Currently, this portion of the Specific Plan area is developed with two structures and a storage yard that remains in use by Atlas Iron and Metal Company.

Southeast Corner Properties (10127, 10220, and 100211 S. Alameda Street and 2401 and 2475 E. 103rd Street). Since 1928, the property has been used for mixed-use purposes, developed with both residential and commercial structures including a gas and oil service station. By 1947, the site was developed with light industrial uses, including a pipe and steel shop, welding activities, machine shop, auto repair with a gas and oil stored in the yard area, and aluminum casting. Since 1951, the northern portion has been used by Utility Material Supply Company, Phil's Junk Company, and Klein Company scrap metal through the late 1960s. After 1976, this portion was used by Hook Auto Wrecking Company until 1986, following which a truck repair shop operated at the site, most recently by Arellano Truck Repair.

The central portion of the southeast corner properties was occupied by Vulcan Pipe and Engineering Company from 1951 until 1986 and by Vulcan Manufacturing Company until 1976. Since 1996, Superior Pipe Fabricators has utilized the site for the fabrication of pipes and pipe fittings. Since 1951, the southwest portion of the southeast corner properties has been used by Sphinx Manufacturing Company, a metals plating facility. The facility consisted of several trench systems and two clarifiers to regulate effluent from plating. Operations at the site ceased in 1986, and the entire site was demolished, including the removal of the concrete foundations. Soil sampling and remediation was conducted between 1986 and 1994, identifying soil contamination that was excavated from southern portion of the site.

The corner of this southeast area has been primarily utilized for auto repair since 1928. A gas and oil station was observed in 1928, and gas and oils were observed in the yard in 1950. Currently, this area is still used for auto repair purposes.

⁵Housing Authority of the City of Los Angeles, *Jordan Downs Redevelopment Project Site and Study Area*, 2007.



LEGEND:



Specific Plan Area Properties



Publicly-owned Properties

- 1. Jordan Downs Public Housing Complex and Recreation Center
- 2. HACLA-owned 21-acres
- 3. David Starr Jordan High School



Privately-Owned Properties

- 1. Central Eastern Properties
- 2. Southeastern Corner Propertiest
- 3. Mudtown Farms



APPROX. SCALE



SOURCE: TAHA, 2010.



Jordan Downs Specific Plan
Environmental Impact Report

taha 2008-079

CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING

FIGURE IV.H-1

SPECIFIC PLAN AREA PROPERTIES

Mudtown Farms. Prior to 1938, the site was undeveloped. In 1947, the site was developed with residential uses and was indicated to be part of the Jordan Downs public housing complex in 1950. By the mid 1960s, this area was used as a multi-purpose health center until the mid 1980s. After 1989, all previous on-site structures had been demolished, and the site was undeveloped until approximately 2002. This site is currently occupied by a community garden.

Hazardous Materials Database Site Listing

As part of the Phase I ESAs, federal, State, local, tribal, and proprietary environmental databases were searched to determine the environmental regulatory status of the Specific Plan area, adjoining facilities, and facilities identified within the specified approximate minimum search distance. **Table IV.H-1** summarizes the databases reviewed and the approximate search distances, and indicates if the Specific Plan area, adjacent properties or surrounding sites are listed.

In addition to federal and State regulatory databases, research was conducted at the following agencies in order to evaluate environmental conditions associated with the Specific Plan area: the Los Angeles County Department of Health Services/Public Health Investigation (LA County DHS/PHI), the Los Angeles County Department of Public Works (LACDPW) Environmental Programs Division, Los Angeles City Fire Department (LAFD), Hazardous Materials Division and Underground Storage Tank Division, Los Angeles City Sanitation Department, California Department of Toxic Substances Control (DTSC) Chatsworth Office, the public database EnviroStor, California State Water Resources Control Board Los Angeles Region Office, and the public database GeoTracker.

TABLE IV.H-1: REGULATORY DATABASE RESEARCH				
Database Name	Database Search Distance (Miles from Specific Plan Area)	Specific Plan Area Listed in Database? (YES/NO)	Adjacent Sites to Specific Plan Area listed? (YES/NO)	Number of Other Sites Within Search Distance
Federal NPL	1.0	NO	NO	0
Federal De-listed NPL	1.0	NO	NO	0
Federal CERCLIS	0.5	YES	NO	0
Federal CERCLIS NFRAP	0.5	NO	NO	4
Federal RCRA CORRACTS	1.0	NO	NO	1
Federal RCRA non-CORRACTS TSD	0.5	YES	NO	1
Federal RCRA Generators	0.25	YES	NO	11
Federal Institutional/Engineering Controls	0.5	NO	NO	0
Federal ERNS	Property	NO	NO	0
State/Tribal Equivalent NPL	1.0	NO	NO	5
State/Tribal Equivalent CERCLIS	0.5	YES	NO	16
State/Tribal Landfill	0.5	YES	NO	6
State/Tribal UST	0.25	YES	NO	3
State/Tribal Leaking UST	0.5	YES	NO	7
State/Tribal Institutional/Engineering Controls	0.5	NO	NO	0
State/Tribal Voluntary Clean-up Sites	0.5	NO	NO	2
State/Tribal Brownfield Sites	0.5	NO	NO	0
SOURCE: Andersen Environmental, <i>Phase I Environmental Site Assessment Report Performed at Jordan Downs Redevelopment Project Area – Jordan Downs Housing Development</i> , March 24, 2010.				

Publicly-Owned Properties

Jordan Downs Public Housing Complex and Recreation Center. The site is listed on the Resource Conservation and Recovery Act (RCRA-SQG) and Facility Index System/Facility Registry System (FINDS) databases. Based on the information provided, the property is a small-quantity generator of hazardous waste that includes batteries, lamps, pesticides, and thermostats with no reported violations.

David Starr Jordan High School. Jordan High School is listed on the School Property Evaluation Program (SCH) and EnviroStor regulatory databases. According to the information provided, assessment at the high school property began in 2000 due to military explosives recycled at the metals recycling facility in the adjacent parcel. Metals and PCBs were detected at elevated levels on the sports field in 2004. Consequently, the contaminated soil was removed by a DTSC contractor and was certified via letter on May 4, 2005. As certification has been provided by the DTSC, no further action is required.






HACLA-Owned 21.08-Acre Property (9901 S. Alameda Street). The site is listed on the Industrial Waste and Underground Storage Tank Sites Street Number List (Los Angeles Co. HMS) database. According to the listing, the SW Steel Rolling Mills (a former business occupying the site) property was an industrial facility with a permit for industrial wastewater discharge that regulated 13.7 million gallons of annual wastewater flow which was issued in September 12, 1974. No violations were reported under this permit. No documentation of underground storage tanks (USTs) at the site was identified by the LACDPW; however, there was indication of historical USTs at the site through building permits. A 1996 environmental assessment of the property was conducted based upon the historical use of the entire site as a steel mill, in addition to the current use as a steel mill in the southeast corner. Petroleum hydrocarbons were detected in the samples collected in the areas of the former settling pond and areas of metal scrap storage.

More recently, a geophysical survey at the site was performed to evaluate whether any USTs are currently located at the site and to identify evidence of former USTs and other subsurface features that may have caused a negative impact at the site. Based on the number of anomalies identified by the geophysical survey, exploratory excavations were necessary to assess the nature and significance of the anomalies identified. No positive evidence of current or former UST locations was identified during the geophysical survey or exploratory excavations. Subsequent soil sampling on the site, which included 97 soil borings, was completed. The locations and details related to all soil samples taken at the site are included in the Phase II ESA contained in Appendix C. One boring to a maximum depth of 50 feet below ground surface (bgs) was done to evaluate groundwater depth. Groundwater was not encountered at the maximum depth explored. The rest of the soil borings were terminated at a depth of eight feet bgs. Laboratory analysis of soil samples revealed PCBs, metals, and extractable petroleum hydrocarbons exceeding their respective screening levels in certain areas of the site. Pesticides and VOCs were detected at below soil screening levels for residential soil.

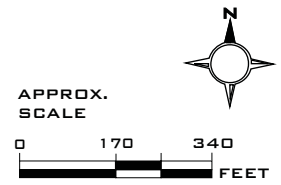
Metals Assessment. Based on the historical use of the property as a steel milling facility, AE analyzed soil samples from all areas of the property for metals. Due to the suspected limited migration potential of metals in soil, shallow soil samples were selected for metals analysis. Subsequent metals analysis was performed on the deeper soil samples collected from soil borings where elevated detections of metals were found. Laboratory results for metals were compared to regulatory guidelines California Environmental Protection Agency (Cal/EPA) California Human Health Screening Levels (CHHSLs) for residential and commercial properties (Cal/EPA, January, 2005). Detailed images depicting the extent of metals contamination in excess of these regulatory and commonly applied thresholds can be found in the Residential and Commercial Metals Diagrams included in **Figures IV.H-2 and IV.H-3**.



LEGEND:






-  HACLA-owned property
-  8-foot level
-  6-foot level
-  4-foot level
-  2-foot level

SOURCE: Andersen Environmental, 2010.

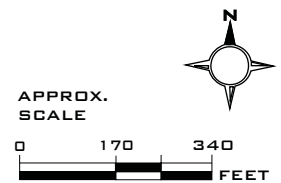




LEGEND:

-  HACLA-owned property
-  8-foot level
-  6-foot level
-  4-foot level
-  2-foot level

SOURCE: Andersen Environmental, 2010.



Antimony, arsenic, cadmium, copper, lead, and zinc were detected in the soil samples above the CHHSLs for residential or commercial properties set by the Cal/EPA. All other metals detected in the soil samples were found to be below the CHHSLs for residential properties.

Antimony was detected in soil samples analyzed at concentrations ranging from 2.7 to 431 mg/kg. Antimony was detected above the residential CHHSL (30 mg/kg) in soil samples collected and analyzed from 17 soil borings to a maximum depth of eight feet bgs. Antimony was detected above the commercial CHHSL (380 mg/kg) in 1 soil boring at two feet bgs.

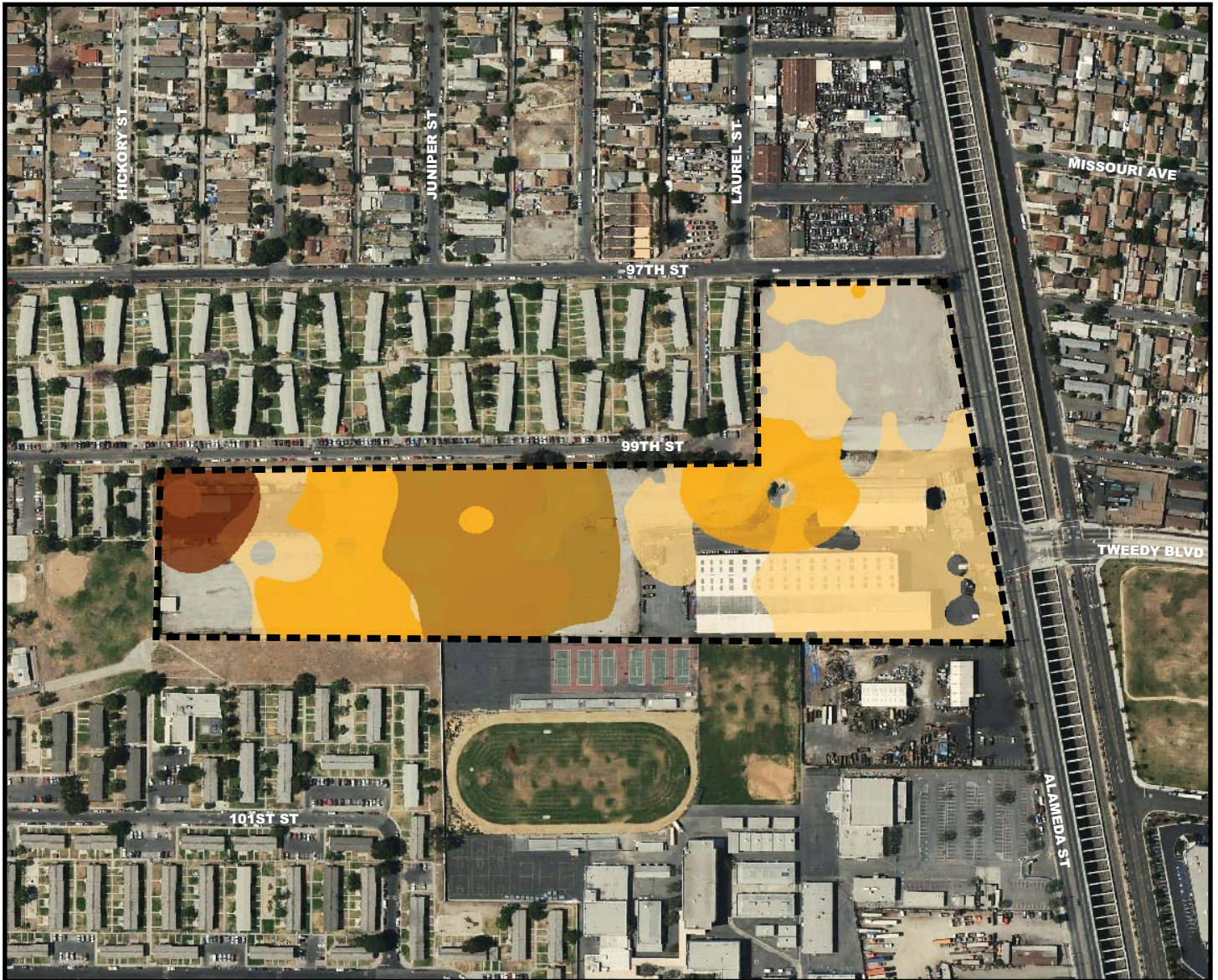
Arsenic was detected in soil samples analyzed at concentrations ranging from 1.1 to 44.2 mg/kg. The CHHSL for arsenic in soil at residential and commercial properties are 0.07 mg/kg and 0.24 mg/kg, respectively. Background levels of arsenic in California soils commonly exceed the regulatory risk-based screening levels, such as CHHSLs. In AE's experience, background arsenic concentrations in the Los Angeles and Orange County region are commonly in the range of 1 to 12 mg/kg. The arsenic detected in soil samples in this investigation were compared to the background level of 12 mg/kg. Arsenic was detected above background levels in soil samples collected and analyzed from 30 soil borings to a maximum depth of 8 feet bgs.

Cadmium was detected above residential and commercial CHHSLs in the many samples analyzed at concentrations ranging from 1.1 to 380 mg/kg. Cadmium was detected the above residential CHHSL (1.7 mg/kg) in soil samples collected and analyzed from 42 soil borings to a maximum depth of 8 feet bgs. Cadmium was detected above the commercial CHHSL (7.5 mg/kg) in soil samples collected and analyzed from 23 soil borings to a maximum depth of eight feet bgs.






Copper was detected above residential CHHSLs in the soil samples analyzed at concentrations ranging from 4.6 to 7,610 mg/kg. Copper was detected above the residential CHHSL (3,000 mg/kg) in soil samples collected and analyzed from two soil borings at a maximum depth of eight feet bgs. Copper was not detected above the commercial CHHSL (38,000 mg/kg) in any of the soil samples collected and analyzed.

Lead was detected above residential and commercial CHHSLs in the many samples analyzed at concentrations ranging from 0.8 to 22,000 mg/kg. Lead was detected the above residential CHHSL in soil samples collected and analyzed from 43 soil borings to a maximum depth of eight feet bgs. Lead was detected above the commercial CHHSL in soil samples collected and analyzed from three soil borings to a maximum depth of two feet bgs. The CHHSLs for lead in soil at residential and commercial properties are 150 mg/kg and 3,500 mg/kg, respectively.

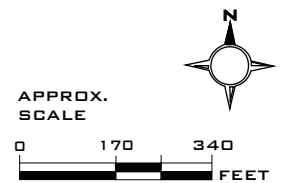
Petroleum Hydrocarbon Assessment. Based on the historical use of the property as a steel milling complex, soil samples were analyzed from all areas of the property for petroleum hydrocarbons. Petroleum hydrocarbon laboratory results were compared to Los Angeles County Fire Department (LACFD) residential screening level of 1,000 mg/kg for total petroleum hydrocarbons in surface soils and also to Soil Screening Levels (SSLs) as prescribed by the Los Angeles Regional Water Quality Control Board (LARWQCB) in the "Interim Site Assessment and Cleanup Guidebook". The SSLs for diesel and oil range hydrocarbons in soils where ground water is in excess of 20 feet bgs are 1,000 mg/kg and 10,000 mg/kg, respectively. Although the historical high groundwater in the vicinity of the site is reported to be approximately 10 feet bgs, for the purpose of AEs assessment this SSL has been applied based on AEs review of groundwater data for groundwater wells in close proximity to the site. Detailed images depicting the extent of petroleum hydrocarbon contamination in excess of these regulatory thresholds can be found in the Extractable Hydrocarbon Plans included in **Figures IV.H-4** and **IV.H-5**.

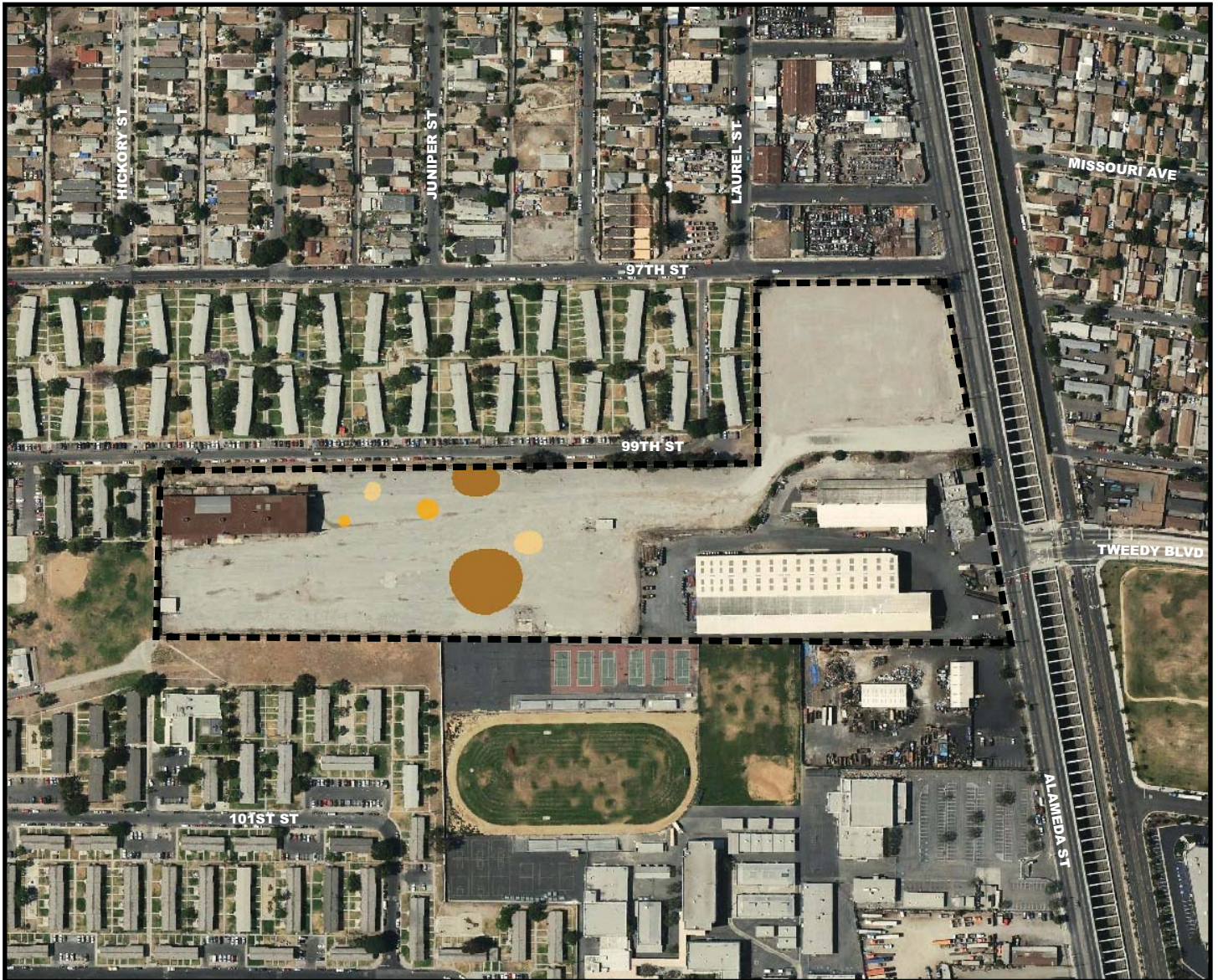


LEGEND:





-  HACLA-owned property
-  8-foot level
-  6-foot level
-  4-foot level
-  2-foot level

SOURCE: Andersen Environmental, 2010.





LEGEND:

-  HACLA-owned property
-  6-foot level
-  4-foot level
-  2-foot level

SOURCE: Andersen Environmental, 2010.

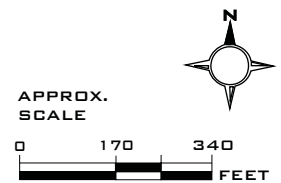


FIGURE IV.H-5

EXTRACTABLE HYDROCARBON PLAN
LARWQCB SOIL SCREENING LEVEL

No analyses for gasoline range hydrocarbons were performed for during this assessment based on the absence of positive evidence of a former UST location. Diesel range hydrocarbons were detected in the soil samples collected up to a maximum concentration of 1,830 mg/kg. Oil range hydrocarbons were detected in the soil samples collected up to a maximum concentration of 12,630 mg/kg. Petroleum hydrocarbons were detected in excess of the LACFD “rule of thumb” residential screening level of 1,000 mg/kg TPH for near-surface soils in 27 soil borings. Diesel range hydrocarbons were detected in excess of the LARWQCB SSL in soil samples collected and analyzed from four soil borings to a maximum depth of four feet bgs. Oil range hydrocarbons were detected in excess of the LARWQB SSL in soil samples collected and analyzed from three soil borings to a maximum depth of six feet bgs.

Volatile Organic Compound Assessment. Several locations were selected for soil sampling for laboratory analysis for VOCs. Subsequent VOC analysis was performed on deeper soil samples from borings where detections of elevated concentrations of VOCs were identified. VOC laboratory results were compared to soil cleanup screening levels derived in accordance with the LARWQCB “Interim Site Assessment and Cleanup Guidebook” and Regional Screening Level (RSLs) as prescribed by the USEPA for residential properties. All VOCs detected were below respective regulatory guidelines.

Pesticides and PCBs. The pesticides alpha-chlordane and gamma-chlordane and the PCBs Aroclor-1254 and Aroclor-1260 were detected in samples analyzed. PCB and pesticide detections were compared to Cal/EPA CHHSLs and USEPA RSLs for residential land use. Pesticides and PCBs detected in soil during this investigation were below their respective RSLs but slightly above the CHHSL of 89 µg/kg.

Privately-Owned Properties

Central Eastern Privately-Owned Parcels. The site currently occupied by Atlas Iron and Metal Company is listed on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), Statewide Environmental Evaluation and Planning System (SWEEPS UST), facility and manifest data (HAZNET), Los Angeles Co. HMS, and the Recycler Database (SWRCY) databases. Based on the CERCLIS database, the site is not a federal facility and is not listed on the national priority list. The facility is a “removal only site” with no site assessment work needed. According to the SWEEPS UST and Los Angeles Co. HMS databases, one UST was installed at the property in 1980. According the LACDPW, one 10,000-gallon UST was removed from the northern portion of the property under proper regulatory oversight and consequently granted closure on August 29, 2000. Additional information reviewed with the LACDPW and Los Angeles County Department of Health Services, Public Health Investigation (LA County DHS/PHI) indicated that the site had poor housekeeping and improper storage in the past, which additionally led to stormwater discharge violations in 2002. Hazardous materials stored at the site as of 2007 included waste oil, waste absorbers, oily water, oxygen, motor oil in a 550-gallon aboveground storage tank (AST), diesel fuel in a 750-gallon AST, hydraulic oil in a 200-gallon AST, and propane in a 4,065-cubic-foot tank. Based on the SWRCY database, the property has operated as a recycling facility since 1947.

The presence of a former UST at 10019 South Alameda Street within the Central Eastern Privately-Owned Parcels is considered a historical recognized environmental condition based upon the removal under regulatory oversight and regulatory closure in 2000. The property has been utilized for light industrial use with known hazardous materials on-site for over 50 years at the site.

Southeast Corner Privately-Owned Parcels. The northern portion of the Southeast Corner Privately-Owned Parcels contains Arellano Truck Repair, a local trucking business with storage. This business is also known to perform oil changes and parts cleaning on-site according to LA County DHS/PHI. This business was known as Lemus Trucking Company (1990 to 1999) and then as Konocho’s Truck Repair (1999-2006). Arellano Truck Repair has been a tenant since 2006 and, as of 2008, there have been no

changes to the inventory, which includes the storage of oxygen, acetylene, argon, grease, 10-gallons of diesel fuel, 24-gallons of motor oil and 220-gallons of used oil. No violations have been reported.

Several entities at 10211 South Alameda Street were identified for the central portion of the area. Superior Pipe & Supply, which fabricates pipe and fittings through welding processes, is listed to have Non-RCRA status with LA County DHS/PHI. A business plan has been recorded since 1998. As of 2006, oil absorbent, waste aerosols, and waste oil are stored on-site and disposed of through manifests. Soil samples were collected in March of 2008 for production dusts as requested by DTSC. According to the DTSC, the facility has no risk to the adjacent school. No violations have been reported.

The southwest corner of the area, Sphinx Manufacturing, is listed on the "Cortese" Hazardous Waste & Substances Sites List (CORTESE), SWEEPS UST, FINDS, Geotracker's Leaking Underground Fuel Tank Report (LUST), Resource Conservation Recovery Act (RCRA-TSDF & RCRA-NonGen), and Los Angeles Co. HMS databases. Based on the review of the FINDS, RCRA-TSDF, and RCRA-NonGen databases, the site is listed as a transporter, storage, and disposal (TSD) facility of hazardous waste not generated at the site. Administrative violations were reported for the property and have been abated. According to the CORTESE, SWEEPS UST, LUST, and Los Angeles Co. HMS databases, at least one UST was present at the site and removed under the proper regulatory oversight. A leak of an unknown substance occurred in 1987, impacting the soil. The LUST case at the site granted closure in 1994. The site had been occupied by a metal plating facility with an industrial waste permit for the plating effluent from 1956 until 1986 when operations ceased. In September 1989 the buildings at the site were demolished, and the interceptors and the concrete building foundations were removed. Remedial activities were conducted to identify negative impacts from the metal plating activities and to remove the contaminated soils from the site. According to a letter from the LACDPW dated August 24, 1994, the site was granted closure for the removal of two clarifiers and the remedial activities of the soil at the site.

Several entities at 10229 South Alameda Street were identified for the southeast corner of the area. Roberto's Body Shop is listed on the RCRA-SQG and FINDS databases. According to these databases, the property is a small-quantity generator of hazardous wastes. The owner/operator is listed as Trust Services of America, and no violations have been reported. A paint spray booth was formerly located within a previous building from as early as 1990 until 1996. The area was also formerly occupied by Northern Trust of California, including the site of the historic gas and oil service station. This facility is listed on the Geotracker's LUST and CORTESE databases. According to these databases, a gasoline leak occurred at the property affecting potable groundwater in 1993. The site was granted closure by the LARWQCB in 1996. Four USTs were indicated to have been removed in 1992, including one 5,000-gallon and two 1,000 gallon gasoline USTs, and one 1,000-gallon waste oil UST. Consequently, the site was granted closure by the LARWQCB by a letter dated June 25, 1996. No details of the site investigation or remedial action were identified in the LACDPW file, and the physical file at the LARWCB could not be located. As such, AE could not verify whether the soil samples collected during the closure of the former waste oil tank were analyzed for VOCs or metals.

The historical use of 2401 East 103rd Street as a metal plating facility is considered a historical recognized environmental condition. The former metal plating facility has been completely removed and provided regulatory closure in 1994 after remedial activities under the proper regulatory oversight.

The presence of former USTs at 10029 South Alameda Street (the location of the former gas and oil station) is considered a historical recognized environmental condition. The USTs associated with the former gas station were removed from the property in 1992 under the proper regulatory oversight and provided regulatory closure in 1996. The property has been utilized for light industrial and auto repair use with known hazardous materials on-site for more than 50 years.

Mudtown Farms. No listings were found for this portion of the Specific Plan area on the regulatory databases researched.

Adjacent Properties

Northern Adjacent Properties along East 97th Street. None of the northern adjacent properties were listed on the regulatory databases researched.

Eastern Adjacent Properties along South Alameda Street. Two occupants were identified for the eastern adjacent properties:

Pacific Motor Trucking Company (10250 South Alameda Street). The cross gradient adjacent property is listed on the RCRA-SQG, and the FINDS database. According to records, the site was a small-quantity generator of hazardous materials operated by General Motors Corporation with no violations reported. This listing is not considered an environmental concern with respect to the Specific Plan area as there is no indication of a release at the property and it is cross gradient to the Specific Plan area.

Southeastern Area New HS No. 2/MS No. 3 (Tweedy Boulevard/Alameda Street). The cross gradient adjacent property is listed on the SCH and EnviroStor databases. According these databases, historical uses of the site included a junkyard, manufacturing, and other retail operations. Environmental concerns identified at the site included possible PCB, arsenic, and lead contamination of the soil. A second SCH listing for the site indicated that approximately 1,940 cubic yards of arsenic- and lead-impacted soils were excavated from the site under a DTSC-approved Work Plan in 2002. A review of the investigation and site was performed by the DTSC and the site was issued a No Further Action (NFA) letter in 2004. This site is not an environmental concern as the remedial action for arsenic- and lead-impacted soils have been completed to the satisfaction of the appropriate regulatory agency.

Southern Adjacent Properties along East 103rd Street. Several occupants were identified for the southern adjacent properties:

Pacific Industrial Metals. The down-gradient south adjacent site is listed on the Los Angeles Co. HMS and SWEEPS UST databases. According to the Los Angeles Co. HMS database, the site was formerly a hazardous materials operations site. The database indicated that the site has been removed from this classification. According to the SWEEPS UST database, the site has utilized USTs of unknown capacity. The materials stored in USTs are unknown. This operator is not considered an environmental concern as there is no record of a release of hazardous materials.

Alameda Street Metals/Pacific. The down-gradient south adjacent site is listed on the HAZNET, CORTESE, Spills, Leaks, Investigations and Cleanup (SLIC), and LUST databases. The CORTESE and HAZNET databases indicated that up to 0.1 tons of PCBs and materials containing PCBs from this site were taken to a landfill in Kings County for disposal. The SLIC database indicated a release on the property that is involved in a cleanup program overseen by the LARWQCB Region 4 Division. The LUST database indicates that there was a release of aviation-related products on the property that impacted only the site soil .

According to the Geotracker database, the UST removed from the property in 1992 was a 10,000-gallon diesel tank. The site consequently was provided closure September 19, 1994. As the property is down-gradient from the Specific Plan area and has been provided closure, it is not a significant environmental concern for the Specific Plan area.

Jorgensen Company. The down-gradient south adjacent site is listed on the SLIC database. The SLIC database indicated a release on the property that is overseen by the Los Angeles County Fire Department

(LACFD). Based on review of Geotracker, this SLIC listing is open since January 1965. The review of the LACDPW file for the address indicated closure under Pacific Industrial Metals; however no file was found specifically for the Jorgensen Company. The listing is not a significant environmental concern to the Specific Plan area as it is down-gradient and thus unlikely that contamination would migrate to the site.

Western Adjacent Properties along Grape Street. None of the western adjacent properties were listed on the regulatory databases researched.

Surrounding Area. Two listings were identified for an up-gradient surrounding property located approximately 318 feet north of the Specific Plan area:

G K Disposal Inc. The surrounding up-gradient property to the north is listed on FINDS, Historical Hazardous Substance Storage Container (HIST UST), and RCRA-NonGen databases. According to the FINDS database, the site has the general description of “other pertinent environmental activities identified at the site.” According to the HIST UST database, the site has had three USTs of 6000-gallon capacity for the purpose of storing unleaded fuel. According to the RCRA-NonGen database, the site is a private generator of wastes that do not include hazardous materials. The site is not an environmental concern with respect to the Specific Plan area as there is no record of a release.

Costa Management Inc. The surrounding up-gradient property to the north is listed on the LUST database. According to the LUST database, the site is listed to as open with ongoing site assessment as of 2007. Potential contaminants are listed to be gasoline, benzene, and trichloroethylene (TCE) that potentially affect wells used for drinking water. Due to the limited information in the LUST database additional research was conducted for this site at the LARWQCB.

The LARWQCB file for this site contained the *Report of Additional Subsurface Investigation and Soil Excavation Following UST Removal, Commercial Property 9622 Kalima Street, Los Angeles, CA, 90002*, prepared by Gaston and Associates (G&A), dated February 15, 2007. At the time of the investigation, the site was vacant and was found to have two 6,000-gallon USTs and one 5,000-gallon UST. Former use of the USTs was not established by the investigation. Removal of the USTs and subsequent sampling of soil beneath the UST locations was performed under LACFD oversight. The report states that elevated concentrations of total recoverable petroleum hydrocarbons (TRPH) (up to 1800 mg/kg), TRPH as gasoline (up to 1300 mg/kg), toluene (up to 78 mg/kg), ethylbenzene (up to 120 mg/kg), and total xylenes (630 mg/kg) were detected beneath two of the USTs. Further investigation identified concentrations of gasoline-related compounds underlying the former tank locations from near-surface soils to groundwater, which was encountered at approximately 66 feet bgs. Gasoline-related compounds were identified in groundwater collected from the site including total petroleum hydrocarbons as gasoline (110 µg/L), benzene (40 µg/L), toluene (4.6 µg/L), and total xylenes (4.8 µg/L). Further soils analysis was performed to determine the vertical and lateral extent of soil impact prior to completion of the UST removal project and areas of impacted soils (of unspecified amount) identified were excavated from the site. Excavations reached as deep as 16 feet bgs in areas of the site and confirmatory sampling and laboratory analysis did not indicate the presence of gasoline-related compounds in sidewall or excavation bottoms. The excavations were backfilled and the case was forwarded to the LARWQCB. G&A has submitted a workplan for the installation of groundwater monitoring wells for this site was been submitted to the RWQCB on March 4, 2009 by the consultant working on behalf of the responsible party, which has been identified as Costa Management, Inc. Though this site is located up-gradient of the Specific Plan area, this site is not a significant environmental concern with respect to the Specific Plan area as the responsible party has been identified and regulatory oversight is currently being directed by the LARWQCB.

Use, Storage, and Disposal of Hazardous Materials

Publicly-Owned Properties

Jordan Downs Public Housing Complex and Recreation Center. Chemical storage has been observed within the maintenance area of the HACLA office, where supplies are stored for the maintenance of the housing units.⁶ Chemicals that were observed included several five-gallon and one-gallon containers of paint. Supplies observed included ovens and refrigerators in addition to tools for the maintenance of the housing units and the landscaping of the grounds. One clarifier has been observed in the maintenance yard near the storage shed, located along the south side of the office structure, associated with an area in which refrigerators and ovens are cleaned with potable water. The presence of the clarifier at the site is not considered a recognized environmental condition, as the clarifier is not associated with any chemical use at the site.

David Starr Jordan High School. Notable storage of hazardous materials has been observed in the science building (centrally located on the property), woodshop (at the eastern portion), and custodian space (at the eastern portion) at Jordan High School. In the science building laboratory, hazardous materials have been observed, as well as proper storage of small quantities of various chemicals with labels. The woodshop was observed to have a small enclosed spray paint booth for painting of projects. No drains were observed and the space appeared in good condition. In the same area, shelves of paints and finishes were observed. The custodian's space was observed to have various cleaning supplies and refills for soap dispensers. Gasoline in five-gallon containers was kept for maintenance vehicles and lawnmowers. None of these hazardous materials are expected to be of significant environmental concern for the property as they were properly stored, labeled, and kept in small quantities.

HACLA-Owned 21.08-Acre Property (i.e., 9901 S. Alameda Street). Notable features at the vacant portion of this property include abandoned transformers and three stormwater discharge pits. The transformers are a potential source of PCB contamination and the pits are a potential pathway for surface contamination to the subsurface. Current hazardous material storage at the site includes storage of approximately fifteen five-gallon containers of universal gear lube, gear oil, engine oil, and transmission fluid, and four 55-gallon drums of engine oil, lubricant, and motor oil. Storage of approximately eight 5-gallon containers of mineral spirits and two 55-gallon drums of waste oil were observed in the southern structure, in addition to an approximately 7,500-gallon AST of diesel fuel to the north of the structure. Previously, the site had been used to store large quantities of metals.

Privately-Owned Properties

Access was not granted to conduct a site reconnaissance as part of the Phase I ESA prepared for the privately-owned properties; therefore, knowledge of current significant hazardous material storage or recognized environmental conditions is unknown.

⁶Anderson Environmental, *Phase I Environmental Site Assessment Report Performed at Jordan Downs Redevelopment Project Area – Jordan Downs Housing Development*, March 24, 2010.

Asbestos Materials and Lead-Based Paint

Asbestos-containing materials (ACMs) were widely used in structures built between 1945 and 1980. Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Commercial/industrial structures are affected by asbestos regulations if damage occurs or if remodeling, renovation, or demolition activities disturb ACMs. Lead-based paint (LBP) was primarily used from the 1920s through 1978. Commercial/industrial structures are affected by lead-based paint regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb lead-based paint surfaces.

Methane

In response to growing concern regarding methane intrusion into buildings and to the potential for methane build-up underneath buildings, the City of Los Angeles Department of Building and Safety has established methane zones and methane buffer zones for the City based on the proximity to oil wells and landfills. The Specific Plan area is not located within a methane or methane buffer zone.

Regulatory Framework

Hazardous materials and hazardous wastes are regulated by many federal, State, and local laws. These include not only specific statutes governing hazardous waste, but also a variety of laws regulating air and water quality, human health, and land use.

Federal. The primary federal laws regulating hazardous wastes/materials are the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). The purpose of CERCLA, often referred to as Superfund, is to clean up contaminated sites so that public health and welfare are not compromised. RCRA provides for “cradle to grave” regulation of hazardous wastes. Other federal laws include:

- Community Environmental Response Facilitation Act (CERFA) of 1992,
- Clean Water Act,
- Clean Air Act,
- Safe Drinking Water Act,
- Occupational Safety and Health Act (OSHA),
- Atomic Energy Act,
- Toxic Substances Control Act (TSCA), and
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

In addition to the acts listed above, Executive Order 12088, Federal Compliance with Pollution Control, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

State. Hazardous waste in California is regulated primarily under the authority of the Federal Resource Conservation and Recovery Act of 1976, and the California Health and Safety Code. At the state level, authority for the statewide administration and enforcement of RCRA rests with the Cal/EPA DTSC. While the DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers state-wide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent

releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

Other California laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Worker health and safety and public safety are key issues when dealing with hazardous materials that may affect human health and the environment. Proper disposal of hazardous material is vital if it is disturbed during project construction. The California Occupational Safety and Health Administration program (Cal-OSHA) is administered and enforced by the Division of Occupational Safety and Health (DOSH). The Cal-OSHA program contains rules and procedures related to exposure to hazardous materials during demolition and construction activities.

Local. At the local level, the LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also has delegated authority to administer and enforce federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

Asbestos-Containing Materials and Lead-Based Paint

The USEPA has enacted strict requirements on the use, handling, and disposal of ACM under the TSCA. These regulations include the phase out of friable asbestos and ACM in new construction materials beginning in 1979. Thus, any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could potentially contain ACM. The Federal EPA has also established National Emission Standards for Hazardous Air Pollutants (NESHAP) that governs the use, removal, and disposal of ACM as a hazardous air pollutant. The NESHAP regulations mandate the removal of friable ACM before a building is demolished and includes notification requirements prior to demolition. Responsibility for implementing these requirements has been delegated to the State of California, which in turn has delegated the responsibility to the South Coast Air Quality Management District (SCAQMD).

The demolition of buildings containing LBP is subject to a comprehensive set of California regulatory requirements that are designed to assure the safe handling and disposal of these materials. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes through CCR, Title 8, Section 1532.1, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse health exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code.

Methane

The City of Los Angeles Methane Seepage Regulations sets forth minimum requirements to control methane for buildings and paved areas that are located in a City-designated methane zone or a methane buffer zone. Requirements for new construction within such zones may include site testing for methane gas, installing a barrier (i.e., a membrane shield) between the building and underlying earth, installing a vent system(s) beneath the barrier and/or within the building, and installing a gas (methane) detection system.

Emergency Response/Evacuation Plan

The Specific Plan area is located approximately eight miles south of downtown Los Angeles, one mile north of the Glenn Anderson Freeway (I-105) in the northeastern portion of Watts at the intersection of several different local jurisdictions that include the Cities of Los Angeles, Lynwood, and South Gate, and the County of Los Angeles. The Specific Plan area is generally bound by 97th Street to the north, Alameda Street to the east, 103rd Street to the south, and Grape Street to the west. According to the Safety Element of the City of Los Angeles General Plan, 103rd street is part of the City of Los Angeles selected disaster routes.⁷

The Specific Plan area is located in an urbanized area comprising primarily residential, commercial, and industrial uses. The Specific Plan area and surrounding uses are not located adjacent to any large forest or vegetated area which could increase fire hazards. According to the Safety Element of the City of Los Angeles General Plan, the Specific Plan area is not located within a wildfire hazard area.⁸ Thus, the potential danger resulting from wildfires is low to non-existent in the project area.

ENVIRONMENTAL IMPACTS

Significance Thresholds

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact on hazards and hazardous materials if the proposed project were to:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- 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;
- 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;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
- 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.

Project Design Features

The proposed project does not include any design elements specific to hazardous materials. However, all project activities including site remediation activities would occur in accordance with applicable federal, State, and local regulations.

⁷City of Los Angeles, *Safety Element of the City of Los Angeles General Plan*, 1996.

⁸*Ibid.*

Analysis of the Proposed Project Impacts

Prior Use of the Specific Plan area

The Phase I ESA revealed no evidence of recognized environmental conditions in connection with Jordan Downs Public Housing Complex and Recreation Center property or the David Starr Jordan High School properties. Access was not granted to conduct a site reconnaissance as part of the Phase I ESA prepared for the privately-owned properties; therefore, knowledge of current significant hazardous material storage or recognized environmental conditions is unknown. Additionally, a questionnaire was provided to be forwarded to those familiar with the site; however no responses had been received by the time of issuance of the Phase I ESA. This lack of access constitutes a limitation, and therefore, this data gap the report does not meet the ASTM and AAI standards of a complete Phase I ESA. This data gap is considered significant and due to the current use of the property as a light industrial facility with known hazardous materials use and storage in the past and is considered a recognized environmental condition for this portion of the Specific Plan area.

Given the prior uses of the HACLA-owned, 21.08 acre property, as well as the results of assessments performed at the site by AE, hazardous substances were used on portions of the Specific Plan area and within the surrounding area. As discussed above, several areas of concern were identified in connection with the historical steel milling at the HACLA-owned, 21.08-acre portion of the Specific Plan area. Specifically, metals were detected in the soil samples above residential CHHSLs in soil samples collected and analyzed from 53 soil borings to a maximum depth of eight feet bgs. Metals were also detected in the soil samples above the CHHSLs for commercial properties in soil samples collected and analyzed from 23 soil borings to a maximum depth of eight feet bgs. In addition, Arsenic was detected above background levels in soil samples collected and analyzed from 30 soil borings to a maximum depth of eight feet bgs. Petroleum hydrocarbons were detected in excess of the LACFD “rule of thumb” residential screening level of 1,000 mg/kg TPH for near surface soils in 27 soil borings. Diesel range hydrocarbons were detected in excess of the applicable Soil Screening Level SSL as prescribed by the LARWQCB in the “Interim Site Assessment and Cleanup Guidebook” for diesel and oil range hydrocarbons soil samples collected and analyzed from four soil borings to a maximum depth of four feet bgs. Oil range hydrocarbons were detected in excess of the LARWQB SSL in soil samples collected and analyzed from three soil borings to a maximum depth of six feet bgs. The PCBs Aroclor-1254 & 1260 were detected above the residential CHHSL in the soil samples analyzed.

Based on the conclusions of their investigation, AE has recommended that a feasibility study to assist in identifying appropriate remedial options and mitigations measures be employed prior to the redevelopment of the site. HACLA has since entered into a Voluntary Cleanup Agreement with DTSC. The purpose of the agreement is for DTSC to provide HACLA with oversight to develop and conduct a Remedial Investigation/Feasibility Study for any Hazardous substance on, or emanating from the 21.08-acre property. If necessary, and under the continued oversight of DTSC, HACLA will develop and conduct Removal Action. Upon the Satisfactory completion of the required work, DTSC will issue a “No further Action” letter and/or a “Remedial Action Certification.”

Mitigation measures have been identified to ensure remediation would occur, and appropriate clean-up measures to address soil contamination would be identified under DTSC’s direction. However, construction of the proposed project would result in a significant impacts related to the potential release of hazardous materials into the environment.

Hazardous Materials Database Site Listing

While portions of the Specific Plan area and surrounding area have been identified in the databases reviewed in the Phase I ESAs, the potential environmental impact from a majority of these listings is considered low due to the type of regulatory listings, the location of the property, and involvement of a regulatory agency in remedial efforts. Therefore, impacts related to hazardous materials database site listings is considered to be less than significant.

Use, Storage, and Disposal of Hazardous Materials

Construction of the proposed project would involve the temporary use of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. As discussed above, the Specific Plan area has been investigated, and contaminated soil is known to exist within the HACLA-owned, 21.08-acre property. Mitigation measures have been identified to ensure remediation would occur, and appropriate clean-up measures to address soil contamination would be identified under DTSC's direction. Construction activities would include the remediation of impacted soils and transporting them to a permitted facility for treatment and/or disposal in accordance with regulatory guidelines.

As a largely residential development, the proposed project would not generate large amounts of hazardous materials that would require routine transport, use, or disposal. Use of these materials is regulated by the County of Los Angeles Department of Environmental Health, LAFD, and Cal-OSHA. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Since construction and operation of the of the proposed project would comply with applicable regulations and would not expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, impacts related to the potential release of hazardous substances during construction of the proposed project would be less than significant.

Asbestos Containing Materials and Lead-Based Paint

Based on the years of construction for some of the buildings within the Specific Plan area, there is a potential that ACM is present on-site. The demolition of these buildings would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition activities. The removal of asbestos is regulated by SCAQMD Rule 1403; therefore, any asbestos found on-site would be required to be removed by a certified asbestos containment contractor in accordance with applicable regulations prior to demolition. Similarly, it is likely that lead-based paint is present in buildings constructed prior to 1979. Therefore, with implementation of mitigation measures the proposed project would result in a less than significant impact related to asbestos and lead-based paint.

HACLA does not have control of the re-use or demolition of any of the buildings located on either the LAUSD- or privately-owned properties. The Specific Plan provisions and guidelines only provide new development standards. Prior to any buildings on these properties being re-used or demolished, a Phase I ESA of these properties would be completed and follow through with any recommendations included in these reports.

Methane

The City of Los Angeles Methane Zone map was reviewed to determine if the Specific Plan area is within located in a methane zone or methane buffer zone. No portions of the Specific Plan area are located within a methane or methane buffer zone. Therefore, no impacts related to methane would occur.

Airport Hazards

The Specific Plan area does not contain any airports. The nearest regional airport, Los Angeles International Airport (LAX), is located approximately ten miles from the site, and the nearest general aviation airport to the Specific Plan area is the Compton Airport, located approximately five miles from the Specific Plan area. The proposed structures would not pose a hazard to approaching airplanes, and therefore, no impacts related to airport hazards would occur.

Emergency Response/Evacuation Plan

The proposed project would not impair or interfere with any emergency response plan or emergency evacuation plan. The City's emergency response needs are served by the City of Los Angeles Fire Department (LAFD). The extension of Century Boulevard would improve emergency access in and out of the project area, and implementation of the proposed project would not alter the configuration of, or access to, the major streets and highways in the project area, including designated evacuation routes. Further, the proposed project design would incorporate the requirements of the LAFD for emergency access. Therefore, the proposed project would have a less-than-significant impact on the circulation and accessibility of emergency response vehicles.

Wildland Fires

The proposed project would not pose a risk of wildfires, as Specific Plan area is located adjacent to or in the vicinity of wildlands. Therefore, there would be no impact related to wildland fires.

Schools

The Specific Plan identifies two potential locations for a new elementary school and an expansion to David Starr Jordan High School. There are also five other public and/or private schools within a quarter mile of the Specific Plan area. The schools include Southeast Middle School, Tweedy/Alameda International Studies Learning Community, Simon Rodia Continuation School, Weigand Avenue Elementary School, and Florence Griffith Joyner Elementary School.

The Specific Plan area has been investigated, and contaminated soil is known to exist within the HACLA-owned 21.08-acre property located adjacent to the Jordan High School. Mitigation measures have been identified to ensure remediation would occur, and appropriate clean-up measures to address soil contamination would be identified under DTSC's direction. Therefore, as construction activities would include the remediation of impacted soils and transporting them to a permitted facility for treatment and/or disposal in accordance with regulatory guidelines, the proposed project would not present a risk of student exposure to hazardous substances. In addition, the release of hazardous materials, substances, or wastes is not reasonably anticipated during the operation of the proposed project. Therefore, impacts related to hazardous emissions or handling of acutely hazardous materials in relation to schools would be less than significant.

CUMULATIVE IMPACTS

Any potentially significant impacts of the nine related projects that have been identified within one-mile of the Specific Plan area (shown in Table III-1 and Figure III-1 in Chapter III Environmental Setting of this Draft EIR) associated with hazards and hazardous materials, or the release, transport, and disposal of hazardous materials, particularly during the construction phase, would be assessed on a case-by-case basis. However, while impacts associated with hazards and hazardous materials are typically site-specific and do not cumulatively affect off-site areas, conditions such as contaminated groundwater can affect down-gradient properties. In addition, operation of the related projects can reasonably be expected to involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. However, all future development within the vicinity of the Specific Plan area would be subject to the same local, State, and federal regulations pertaining to hazards and hazardous materials. It is expected that all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. Therefore, with adherence to such regulations, impacts related to hazards and hazardous materials would not be cumulatively considerable.

MITIGATION MEASURES

HM1 HACLA shall retain a Certified Asbestos Consultant to determine the presence of asbestos and asbestos containing materials (ACM) within buildings to be demolished. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove ACM in accordance with the 1994 Federal Occupational Exposure to Asbestos Standards. ACM removal will be monitored by a Certified Technician.

HM2 For all buildings to be demolished, lead-based paint testing shall be conducted. If lead-based paint is discovered, a licensed lead-based paint/materials abatement contractor shall be retained to safely remove lead-based paint in accordance with HUD Lead-Based Paint Guidelines.

Mitigation Measures HM3 through HM19 implement the Voluntary Cleanup Agreement between HACLA and DTSC to develop and conduct a Remedial Investigation/Feasibility Study for any Hazardous substance on, or emanating from the HACLA-owned, 21.08-acre property.

HM3 HACLA shall not disturb the ground surface nor remove any foundations or other structures on the 9901 S. Alameda Street site without prior approval of the DTSC.

HM4 HACLA shall provide DTSC with all background information, sample analysis results, environmental assessment reports and any other information pertinent to the hazardous substance management and/or release, characterization, and cleanup of the site. DTSC will review the information to identify areas and media of concern, and to determine additional work, if any, required to complete the investigation/remediation of the site. Following DTSC's initial review a scoping meeting will be held to discuss whether further site characterization is necessary, and, if so, how the characterization will be conducted and implemented.

HM5 HACLA shall submit a Remedial Investigation Workplan that describes the activities to further characterize soil, soil gas, surface water, and/or groundwater. The workplan shall include a site health and safety plan, quality assurance/quality control plan, sampling plan, and implementation schedule.

- HM6** HACL A shall submit a Site Characterization Report that presents the data, summarizes the findings of the investigations, validates the data, and includes recommendations and conclusions.
- HM7** HACL A shall prepare a Feasibility Study to evaluate feasible remediation and response alternatives. Reasonable potential alternatives for the remediation of the site shall be evaluated, including the “no action” alternative. The evaluation shall (1) identify the goals for the cleanup based upon current and projected future land uses; (2) evaluate feasible alternatives to meet these goals, including their effectiveness, implementability and cost; and (3) recommend a preferred alternative.
- HM8** DTSC shall determine the appropriate removal action for the site, and HACL A shall prepare a Removal Action Workplan (RAW) in accordance with Health and Safety Code sections 25323.1 and 25356.1. If the proposed RAW does not meet the requirements of Health and Safety Code sections 25356.1(h), HACL A shall prepare a Remedial Action Plan (RAP) in accordance with Health and Safety Code sections 25356.1(c).
- HM9** In order to meet its CEQA obligation, DTSC shall prepare the necessary CEQA documents. If required, HACL A shall submit the information necessary for DTSC to prepare these documents.
- HM10** Upon DTSC approval of the final RAW or RAP, HACL A shall implement the removal action as approved.
- HM11** Within 30 days of completion of field activities, HACL A shall submit an Implementation Report documenting the implementation of the final RAW or RAP and noticing any deviations from the approved plan. During implementation of the final RAW or RAP, DTSC may specify such addition, modifications and revisions to the RAW or RAP as deemed necessary to protect human health and safety or the environment or to implement the RAW or RAP.
- HM12** HACL A shall work with DTSC to ensure that the interested public and community are involved in the DTSC decision making process. Public Participation activities shall be conducted in accordance with Health and Safety Code Section 25358.7 and DTSC’s Public Participation Policy and Procedures Manual.
- HM13** A Land Use Covenant may be required in the final RAW by DTSC pursuant to California Code of Regulation, Title 22 Section 67391.1 to ensure full protection of the environment and human health.
- HM14** HACL A shall comply with any and all operation and maintenance requirements in accordance with the final RAW or RAP or Operation and Maintenance Plan.
- HM15** Any remedial technology employed in implementation of the final RAW or RAP shall be left in place and operated by HACL A until DTSC authorizes HACL A to discontinue.
- HM16** HACL A shall retain a Certified Asbestos Consultant to determine the presence of asbestos and asbestos containing materials (ACM) within buildings to be demolished. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove ACM from the site in accordance with the 1994 Federal Occupational Exposure to Asbestos Standards. ACM removal will be monitored by a Certified Technician.

HM17 For all buildings to be re-used or demolished, lead-based paint testing shall be conducted. If lead-based paint is discovered, a licensed lead-based paint/materials abatement contractor shall be retained to safely remove lead-based paint in accordance with HUD Lead-Based Paint Guidelines.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures **HM1** through **HM17** impacts related to hazards and hazardous materials would be reduced to a less-than-significant level. Mitigation Measures **HM1** and **HM2** would ensure that impacts related to asbestos and lead-based paint as a result of the demolition of the existing buildings on the HACLA-owned property would be less than significant. Mitigation Measures **HM3** through **HM17** would ensure that the HACLA-owned, 21.08-acre property is properly remediated to DTSC's satisfaction, and impacts related to hazardous materials would be less than significant.