

4.0 ENVIRONMENTAL IMPACT ANALYSIS

F. HAZARDS AND HAZARDOUS MATERIALS

1. INTRODUCTION

This section analyzes the potential impacts associated with hazards and hazardous materials that could result from implementation of the Project. The analysis considers potential impacts associated with the historical use of hazardous materials on the Project Site and the transport, use, or disposal of hazardous materials that could occur during construction and operation of the Project. The analysis included in this section is based on the Phase I Environmental Site Assessment (Phase I Assessment) and Hazardous Building Material Survey prepared for the Project, which collectively identify the potential environmental concerns (PECs) and recognized environmental conditions (RECs), as defined in established professional standards, on the Project Site. The Phase I Assessment and Hazardous Building Material Survey contain more detailed information than is summarized below and are provided in Appendix E of this Draft EIR.

One other hazards-related topic, groundwater, is addressed in detail in Section 4.G., Hydrology and Water Quality, of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Historical Site Uses

The Harbor-UCLA Medical Center, originally named the Los Angeles County Harbor General Hospital from 1951 to 1978, was founded in 1943 as the U.S. Army's Port of Embarkation Station Hospital, a receiving point and hospital for servicemen returning from the Pacific during World War II. Facilities included an administration building, a collection of Army barracks and cottages, and a hospital that provided medical services for servicemen and their families living in the area. By 1946, the facility was sold as war surplus by the federal government to the County for the development of Los Angeles County Harbor General Hospital (Harbor General Hospital), to provide County-based medical care and hospital services to the increasingly populous southwestern part of the County.

The existing hospital building (Existing Hospital Tower), located in the eastern portion of the Campus, was developed on previously vacant land and completed in 1962. The Hospital replaced a number of the original Army facility's wooden barracks and cottages. Nearly one-third of the original barracks remain in use today as clinics, offices, shops, storage, laboratories and related facilities, augmented by temporary modular buildings and trailers.

The first major expansion of the 1962 Hospital building, the Surgery and Emergency Room Replacement Project, was completed in 2013. The Project increased the size of the existing emergency room and added surgery suites, adult and pediatric triage, a new entrance lobby, and a waiting area, as well as a new helistop and 544-space parking structure.

b. Existing Conditions

The existing 72-acre Harbor-UCLA Campus is currently developed with approximately 1,279,284 square feet of developed floor area. The central campus facilities were constructed prior to 1960, including the wood-frame barracks and temporary buildings. The Project Site still closely follows the original east-west-oriented street grid established in the 1940s. The Hospital, related treatment facilities, and the majority of Campus support facilities (i.e., facilities management and utilities) occupy the eastern third of the Harbor-UCLA Campus, while outpatient services, including MFI and the related Imaging Center, CII, and other facilities, occupy the western end of the Campus. Patient diagnostic facilities, administration offices, and facilities management functions are scattered throughout the Campus.

Tenants on the Harbor-UCLA Campus include LA BioMed, the Harbor-UCLA Professional Building, and the Children's Institute, Inc. (CII). LA BioMed occupies a number of older buildings throughout the 16.5-acre area encompassing the central portion of the Harbor-UCLA Campus and is consolidating its operations within a smaller 11.4-acre leasehold (LA BioMed Campus) in the south-central portion of the Campus. The Harbor-UCLA Professional Building houses nine clinical departments that provide a range of clinical specialties, a laboratory, radiology, nuclear medicine and a pharmacy. CII occupies a 23,435-square-foot facility known as the Burton E. Green Campus in the northwestern corner of the Campus.

Harbor-UCLA Medical Campus is surrounded by urban uses. Commercial uses (mostly neighborhood retail businesses), medical/dental services, the Harbor-UCLA Medical Center Employee Children's Center, a multifamily residential apartment complex, and single-family residential neighborhoods are located to the north, across Carson Street. Neighborhood retail uses, medical services, condominium complexes, two mobile home parks, and wholesale and light industrial uses are located east of the Project Site. Single-family and multi-family residential neighborhoods, the abandoned Union Pacific Railroad right-of-way, and an off-site surface parking lot serving LA BioMed are to the south and west of the Project Site.

(1) Hazardous Materials Database Site Listings

As part of the Phase I Assessment, environmental agency databases that log known hazardous site conditions were reviewed to ascertain whether the Project Site or any adjacent properties were listed on Federal, State, or local databases. These databases list properties by location and provide historic information regarding past use and presence of hazardous conditions. Identification of the databases searched and the findings regarding the Project Site and adjacent sites follows.

(a) Project Site

The Harbor-UCLA Medical Center was listed in the Federal Resource Conservation and Recovery Act (RCRA) Large-Quantity Generator (LQG) list in 2008 for several chemicals including metals, nitroglycerine, formaldehyde, ignitable hazardous wastes, acids, and non-halogenated solvents. There were no violations for this listing. Harbor-UCLA Diagnostic Imaging at 21828 South Normandie Avenue, which is on the Harbor-UCLA Campus, was listed as a small quantity generator (SQG) by RCRA in 1996. The listing showed no violations.

The State Water Resources Control Board GeoTracker lists several Leaking Underground Storage Tanks (LUSTs) on the Harbor-UCLA Campus. Regulatory activities related to these LUSTs, including tank removals,

UST sampling reports, soil and water investigation work plans, and site assessment reports, date back to 1994 and continued until 2000.

Specifically, the GeoTracker database identifies a site on the eastern side of the Harbor-UCLA Campus, near the central plant (aka power plant) with a cleanup status of “Open – Site Assessment” as of March 17, 2015. Additional reports and investigations cited in the database between 1994 and 2000 identify additional soil contamination associated with diesel USTs near the then-proposed Emergency Room expansion loading dock; at a fuel station near Building T-1; near the diesel and amber fuel USTs associated with the central plant; near five USTs located near the Hospital’s hazardous waste storage area that were removed in 1994; and in several other on-site locations. Soil detection levels ranged from non-detect to low to moderate, and while site closures, soil excavations, and soil vapor remediation were recommended for some of these sites in the regulatory documentation cited by the GeoTracker database, it is not known whether all recommended actions were taken and therefore the closure status of these sites is uncertain, as discussed further below.

The Emergency Response Notification System (ERNS) List cites two listings for an approximately 30-gallon gasoline storage tank leak in 1994. Based on the date and activity, it is assumed these were related to the removal of five USTs in 1994.¹

The Harbor-UCLA Medical Center was listed in the following non-ASTM databases: Historical UST, California Hazardous Material Incident Report System (CHMIRS), Hazardous Waste Information System (HAZNET) Facility and Manifest Data, California Facility Information Database (FID) UST, and Statewide Environmental Evaluation and Planning System (SWEEPS) UST. Based on the listings in multiple environmental databases, primarily for USTs and hazardous waste, the Phase I Assessment concluded that the LUSTs cited in these databases, and the uncertain status of related cleanup and closure, constitute recognized environmental conditions on the Harbor-UCLA Campus.

The HAZNET database lists that Harbor-UCLA had over 1,000 listings from 1993 to 2013 of various chemicals being removed from the site under hazardous waste manifests. HAZNET does not track violations and the presence of a facility on the database does not necessarily indicate that a concern exists at the Project Site at this time. Accordingly, the Phase I Assessment determined the HAZNET listing is not, in itself, considered to represent an environmental concern.

According to information contained on the South Coast Air Quality Management District (SCAQMD) Facility Information Detail (FIND) Database,² Harbor-UCLA’s address is listed as LA Co Harbor-UCLA Medical Center with an active status. Equipment with an active permit status include two emergency generators, three low nitrogen oxide burners, and three boilers, all of which had an issued date in 2013. The site address is also listed as LA Co Dept Health Srv, UCLA Harbor Med Ho., with active permits for two “Ethylene Oxide (ETO) Sterilization Hospital” issued in 2000, four emergency generators issued in 1999, and a “Control ETO Sterilization Hospital” issued in 2000. No violations regarding use of this equipment have been recorded.

¹ See Section 7.2, State Water Resources Control Board GeoTracker Website, in the Phase I Hazardous Materials Assessment Report, provided in Appendix E, for a more detailed summary on the actions taken between 1994 and 2000.

² <http://www.aqmd.gov/home/tools/public/find>

Based on the nature of the equipment and regulatory status, SCAQMD records did not reveal the presence of recognized environmental conditions at the property.

(b) Adjacent Properties

The State Leaking Underground Storage Tank (LUST) database lists four out of 10 facilities adjacent to the Harbor-UCLA Medical Center Campus as potential environmental concerns due to the presence of gasoline in underlying soil and/or groundwater:

- Unocal #4944 at 1259 West Carson Street, located adjacent to the northwest, is reported to have groundwater flow towards the site.
- Tony's Unocal at 1259 West Carson Street, located adjacent to the northwest, is reported to have groundwater flow away from the site.
- Mobil #11-MAF at 21700 South Vermont Avenue, located adjacent to the east, is reported to have soil and groundwater data that shows low to non-detect concentrations of total petroleum hydrocarbons (TPHs) and volatile organic compounds (VOCs).
- Shell at 911 West Carson Street, located adjacent to the northeast, is reported to have groundwater flowing tangential to the site.

Based on the varying groundwater flow directions and proximity of several LUST cases to the site, there is a possibility that groundwater beneath the site is impacted with petroleum hydrocarbons from off-site facilities. Groundwater depths beneath the Harbor-UCLA Campus are between 48 and 60 feet below grade surface (bgs), with a historic high groundwater depth of 30 feet bgs; shallower perched groundwater may periodically be encountered in the area. The remaining six sites are reported as not being an environmental concern to the site. For addresses and listings of the sites, refer to Section 6.14, State Leaking Underground Storage Tank (LUST) Lists: Distance Searched – ¼ mile, of the Phase 1 Hazardous Materials Assessment Report, provided in Appendix E.

Several properties in the Project vicinity were listed on the RCRA database. ExxonMobil Oil Corp. at 21700 South Vermont Avenue, to the east and down-gradient of the site, was listed as a LQG in 2002 and a SQG in 2009. Norge Village Cleaners, located at 1161 West Carson Street, adjacent to the northwest and up to cross-gradient of the site, and Shell Service Station, located at 911 West Carson Street, adjacent to the north and cross-gradient of the site, were listed as SQGs in 1993 and 2002. Violations were not found for any of these three facilities. Based on the absence of reported violations, the Phase I Assessment determined that presence of the property on the RCRA database was not considered to represent a concern to the Project Site.

Several adjacent properties were also listed on the UST Registration List. Tosco/Unocal #30769 at 1259 West Carson Street, located adjacent to the northwest and cross-gradient of the site (e.g., at the same elevation), Mobil Oil Corp S/S #18-MAG at 21700 South Vermont Avenue located adjacent to the northeast and downgradient of the site, and Torrance Harbor Shell at 911 West Carson Street located adjacent to the northeast of the site are all listed on the UST database. These listings alone are not indicative of a release and would not be considered a recognized environmental concern to the site.

(2) Potentially Hazardous Materials on the Project Site

Small quantities of hazardous substances are currently used on the portion of the Project Site occupied by the Harbor-UCLA Medical Center. These substances include common hospital materials (e.g. rubbing alcohol, carbon dioxide cylinders, needles), central plant secondary containment necessities (e.g. anti-foam, bleach, pressure oil), and other cleaning agents (e.g. bleach, clout drums, phosphoric acid drums). Significant evidence of releases or spills was not observed at the site and is therefore not considered an environmental concern. See **Table 4.F-1, Hazardous Materials Stored at the Harbor-UCLA Campus**, for a detailed list of hazardous materials and their locations.

Table 4.F-1

Hazardous Materials Stored at the Harbor-UCLA Campus

Building	Location	Storage	Contents	Comments
Hospital	Pharmacy (1 st floor)	Small fire closet	Rubbing alcohol	Used to clean surfaces
		RCRA container	Needles	
	Pathology lab (2 nd floor)	Fire closets	Bleach, alcohols, reaction buffers, diaminobenzene, acids, methanol	
		Lab area	Three carbon dioxide cylinders	
	Dark room (Basement)	10-gallon bucket	Film fixer	Used for radiation therapy
	In-patient pharmacy (basement)	RCRA containers	Epinephrine, Coumadin, chemotherapy chemicals	Restricted area, pictures not allowed
	Stock room (basement)	Fire closet	Phenol solution, acetic acid, tincture benzoin, isopropyl alcohol	Small quantity (less than 5-gallon) containers
	Loading dock	Enclosure	CO ₂ , oxygen, medical oxygen, medical nitrogen, empty cylinders	
		Exterior	Approximately 80 new car batteries	Placed on pallets, no secondary containment
Power Plant	Medical gas storage area	Enclosure	NOS, CO ₂ , helium, argon, sulfur	hexafluoride, nitrogen, oxygen cylinders
	Nitrogen and NOS room S	Enclosure	Nitrogen and NO cylinders	
	Boiler room	Corner of room	Oxygen/acetylene cylinders, 5-gallon buckets and 30- to 55- gallon drums of potassium hydroxide, boiler antifoam, chemical cleaner, corrosion inhibitor, oxygen scavenger	Secondary containment
	Boiler chemical storage area	ASTs	Morpholine, sodium glucoheptonate, sodium metabisulfite	See Section 3.5

Table 4.F-1 (Continued)

Hazardous Materials Stored at the Harbor-UCLA Campus

Building	Location	Storage	Contents	Comments
	Equipment room	Corner of room	5-gallon bucket of pressure oil, 10 50-lb bags of absorbent	Secondary containment
	Exterior	Fire closet	Alcohols	Secondary containment
	Cooling tower	Storage shed	Anti-foam, pressure oil, microbicide, degreaser, bleach, lighter fluid, sulfuric acid	Secondary containment
		Chemical storage area (ASTs)	Microbicide, polymaleic acid, sodium hydroxide	See Section 3.5
LA BioMed	Buildings B1, C1, C3, E1, E6, F1, RB2, RB2 annex, RB3 (2 nd floor), HH	Fire closets	Alcohols, acids, acetone, xylenes, chloroform, petroleum ether, hexanes, toluene, 2-propanol, ethanol, film fixer, potassium chloride, glycerin, pyridine, bleach	Small quantity (less than 5-gallon) containers, two 5-gallon buckets of ethyl alcohol in Building HH,
	Building F1	Chemical storage area	Two 135-pound hydrogen peroxide containers	Secondary containment
	Building RB2 annex	Cage washing area	Two 30-gallon clout (soap) drums, two 30 gallon phosphoric acid drums, four 2-gallon spray buckets of bleach and acid	Used to sterilize animal cages, secondary containment
	Buildings C1, C3, D1, E1, RB2, RB3 (2 nd floor), HH	Gas cylinders	Oxygen, argon, nitrogen, CO ₂ , NOS, helium	
<p>ASTs – aboveground storage tanks CO₂ – carbon dioxide NOS – nitrous oxide RCRA – Resource Conservation and Recovery Act</p> <p>Source: Ninyo & Moore, 2015</p>				

Small quantities of hazardous waste were observed in designated buildings on the site. Six storage sheds with secondary containment were labeled for flammable, corrosive, oxidizing, and poisonous materials. Five of the sheds contained fire closets with small quantities of acid, ammonium sulfate, methanol, etc. The last shed contained used fluorescent light bulbs. Several gasoline canisters and, empty drums, an empty nitrogen tank, and an electrical transformer were seen on the site. Staining or signs of release were not observed in or adjacent to the hazardous waste storage area and is therefore not considered an environmental concern.

(a) Underground Storage Tanks (USTs)

Four USTs are present in the central plant area of the Campus; two supply boilers and hold amber fuel and two support emergency backup generators and hold diesel fuel. A fifth UST identified as an interceptor is located beneath the helistop and is used as an emergency spill collection system for potential helicopter fuel release. The presence of these USTs at the central plant represents a potential environmental concern for the site. Details about these USTs can be found in **Table 4.F-2, USTs on the Harbor-UCLA Campus.**

Table 4.F-2

USTs on the Harbor-UCLA Campus

Area	Location	Tank Capacity (Gallons)	Contents	Construction	Comments
Power Plant	Northern portion	10,000	Amber Fuel	Double-walled fiberglass	Used for boilers, installed in 1999
		25,000		Single-walled fiberglass	
	Southern portion	15,000	Diesel Fuel	Double-walled fiberglass	Used for emergency backup generators, installed in 1999
		15,000			
Helistop	Adjacent to the south	Unknown	Two empty interceptors	Unknown	Emergency spill collection system for potential helicopter fuel release, no staining observed
<p>Source: Ninyo & Moore, 2015</p>					

(b) Aboveground Storage Tanks (ASTs)

ASTs were observed in the central plant area and adjacent to LA BioMed buildings. A total of 12 ASTs were observed in the central plant’s boiler chemical storage area, cooling tower chemical storage area, cooling tower storage shed, adjacent to the cooling tower storage shed, the eastern edge, and outside the power station. The contents varied from sulfuric acid to liquid oxygen. The ASTs adjacent to the LA BioMed buildings contained diesel fuel. Detailed AST information can be found in **Table 4.F-3, ASTs on the Harbor-UCLA Campus.** No indications of spills, leaks, or staining were observed.

(c) Polychlorinated Biphenyls (PCBs)

PCBs are hazardous materials that were formerly used in such applications as hydraulic fluids, plasticizers, adhesives, fire retardants, etc. Several on-site facilities are considered potential contenders for containing PCBs. Pole-mounted transformers were observed along Medical Foundation Drive, Medical Center Drive, South Drive, and between several buildings at the site. Pad-mounted transformers were also observed at the power station and adjacent to LA BioMed buildings. Staining or signs of release was not observed.

Table 4.F-3
ASTs on the Harbor-UCLA Campus

Area	Location	Tank Capacity (Gallons)	Contents	Comments
Power Plant	Boiler Chemical Storage Area	75	Morpholine	Chemicals used for maintaining boilers, secondary containment, no staining observed
		100	Sodium Glucoheptonate	
		75	Sodium Metabisulfite	
		Unknown	Empty	Empty propane tanks, no secondary containment, no staining observed
	Cooling Tower Chemical Storage Area	75	Microbicide	Chemicals used for corrosion protection, secondary containment, no staining observed
		75	Polymaleic Acid	
		75	Sodium Hydroxide	
	Cooling Tower Storage Shed	300	Sulfuric Acid	Planned to be removed this year, secondary containment, no staining observed
	Adjacent to Cooling Tower Storage Shed	4,000	Empty	Baker tank, originally planned to store water, never used
	Eastern edge	9,000	Liquid Oxygen	No secondary containment, no staining observed
900				
Outside Power Station	N/A	Two Autoclaves	One of the autoclave was never put into use, no staining observed	
LA BioMed Buildings	Various	Approximately 200 to 250, one is 500	Diesel Fuel	Eight exterior emergency generators, no staining observed, no secondary containment ^a

Notes:

^a Secondary containment is a means of surrounding one or more primary storage containers to collect any potential hazardous material spillage in the event of loss of integrity or container failure. Hazardous materials are stored in secondary containment to prevent or minimize the possibility of accidental release.

Source: Ninyo & Moore, 2015

Transformers were observed in the power station building of the power plant. According to Mr. Juan Oliva of the Los Angeles County Department of Public Works, PCBs are not used in the power station transformers.

Light ballasts, used as building material for the site, manufactured until the late 1970s commonly contained PCBs. Because the building was constructed before the 1970s, it is assumed that there will be PCBs present in the light ballasts on the site. No leaks or damage was observed in association with the electrical equipment. The LADWP would be responsible for the clean-up of any PCBs on the site.

(d) Asbestos-Containing Materials (ACMs)

Asbestos is a naturally-occurring mineral made up of microscopic fibers that has been widely used in the building industry for a variety of uses. Such uses include acoustic and thermal insulation and fireproofing. It is often found in ceiling and floor tiles, linoleum, and pipes, as well as on structural beams and asphalt. However, asbestos can become a hazard when the fibers separate and become airborne. Asbestos has been linked with lung diseases caused by inhalation of airborne asbestos fibers, and its use in building was banned by 1978.

Based on the age of the building construction (prior to 1980), it is possible that ACM is present in the structures. ACMs observed at the Harbor-UCLA Medical Center includes drywall, joint compound, vinyl floor tile, mastic, insulation, cloth tape, coating, caulking, acoustic ceiling tile, gray carpet, buttonboard, transite pipe, linoleum, duct tape, vent tape, white cove base, glue, asphalt shingles, thermal system insulation, silver paint, and sealant. (Detailed results from an asbestos survey are provided in Table 1 of the Harbor-UCLA Hazardous Building Material Survey in Appendix E.) Prior to renovation or demolition activities which would disturb identified ACMs, a licensed abatement removal contractor shall be contacted to remove the ACMs and perform stabilization activities as required.

(e) Lead-Based Paint (LBP)

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Lead-based paint (LBP) is of concern both as a source of exposure and as a major contributor to lead in interior dust and exterior soil. Based on the date of building construction, it is possible that LBP has been used on the property in the past. For the purposes of identifying LBP on the site and for the Lead-Containing Surfaces (LCS) Survey, any lead-based surface is considered a LCS. (Detailed results from the LCS survey are provided in Table 2 of the Harbor-UCLA Hazardous Building Material Survey in Appendix E.) Identified LCSs shall not be disturbed. Prior to renovation or demolition activities which would disturb identified LCSs, a licensed abatement removal contractor should be contacted to remove the LCSs and perform stabilization activities as required.

(f) Mold

Review of site documentation revealed no documented cases of mold or water intrusion events occurring at the Project Site, and no mold was observed during site reconnaissance.

(3) Other Potential Hazardous Materials on the Project Site

The Phase I Assessment also analyzed potential hazards related to radon and lead in drinking water. Radon is a naturally-occurring, colorless, odorless gas that is a by-product of the decay of radioactive materials potentially present in bedrock and soil. Based on a review of statistical and testing data in Los Angeles

County, radon is not considered to represent an environmental concern at the Project Site and no additional investigation was recommended. Potable water supplied to the Project Site meets or exceeds all drinking water standards, including those for lead, in accordance with applicable drinking water quality standards (refer to Section 4.M.1, Water Supply, of this Draft EIR for further discussion). As such, lead in drinking water testing was not conducted.

According to the City of Los Angeles Department of Building and Safety, the Project is not located within a methane hazard site or buffer zone.³ Furthermore, according to the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) records, no oil wells are located on the Project Site.⁴

c. Regulatory Setting

(1) Federal

(a) Hazardous Materials Management

The use, storage, and disposal of hazardous materials are subject to Federal, State, and local regulations as further discussed below.

The Federal Resource Conservation and Recovery Act (RCRA) (42 U.S.C. secs. 6901-6992k) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, generators of hazardous waste must register and obtain a hazardous waste activity identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. The State of California has developed the California Hazardous Waste Control Law (HWCL) (Health and Safety Code sec. 25100 et seq. and 22 California Code of Regulations [CCR] sec. 66260.1 et seq.) and the U.S. Environmental Protection Agency (USEPA) has authorized RCRA enforcement to the State of California. Primary authority for the statewide administration and enforcement of HWCL rests with California EPA's (Cal-EPA) Department of Toxic Substances Control (DTSC).

The Federal Occupational Safety and Health Act of 1970, which is implemented by the Federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal-OSHA) (codified in the CCR, Title 8, or 8 CCR generally and in the Labor Code secs. 6300-6719) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal-OSHA is very similar to the Federal OSHA program. Among other provisions, Cal-OSHA requires employers to implement a comprehensive written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

³ *City of Los Angeles Department of Public Works, LAMC, Methane Ordinance Map A-20960. City Ordinance No. 175,790. (February 4, 2004).*

⁴ *California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOC) <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>, Accessed January 12, 2016.*

The Safe Drinking Water and Toxic Enforcement Act (22 CCR sec. 12000 et seq.), Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans, restricts the discharges of listed chemicals into known drinking water sources at levels above the regulatory levels of concern, requires public notification of any unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

At the local level, the County of Los Angeles Fire Department Health Hazardous Materials Division administers hazardous waste inspections for generators and monitors their activities, including handling, storage, transportation, and disposal. Specifically, business and facilities that handles hazardous waste and/or materials at any one time during a year equal to, or greater than a total volume of 55 gallons, a total weight of 500 pounds, or 200 cubic feet of a compressed gas will be constituted as a hazardous materials handler and must report hazardous waste information to the California Environmental Reporting System (CERS).⁵ The Health Hazardous Materials Division's Hazardous Waste Program provides a detailed Generator Requirements Summary Chart to give inspectors a list of requirements as they apply to Large Quantity Generators (LQGs), Small Quantity Generators (SQGs), and more.⁶ Different documentation required include manifests, biennial reports, personnel training plans, and contingency plans.

(b) Polychlorinated Biphenyls

PCBs are regulated by the EPA under the Toxic Substances Control Act (TSCA). These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. In addition to TSCA, provisions relating to PCBs are contained in the HWCL, which lists PCBs as hazardous waste.

(c) Airport Safety Provisions

The Federal Aviation Administration (FAA) has established an advisory circular with regard to safety concerns associated with the construction of high-rise buildings since such buildings may present a hazard to aircraft operations.⁷ Federal Aviation Regulations Title 14 Part 77, Objects Affecting Navigable Airspace, establishes minimum standards to ensure air safety by regulating the construction or alteration of buildings or structures that may affect airport operations.⁸

The FAA requires that Form 7460-1, Notice of Proposed Construction or Alteration be filed with the FAA regional office prior to construction of buildings that are 200 feet or greater in height from the graded terrain. Any structure that exceeds an overall height of 200 feet above ground level should generally be

⁵ <http://cers.calepa.ca.gov/>

⁶ <http://www.fire.lacounty.gov/wp-content/uploads/2014/03/Hazardous-Waste-Generator-Summary-Requirements.pdf>

⁷ FAA Advisory Circular 70/7460-1L (December 4, 2015).

⁸ 14 C.F.R. Part 77 (2001).

marked and/or lighted.⁹ However, this determination is made by FAA and depends on terrain features, weather patterns, geographic location, number of structures, and overall layout of design.¹⁰

(2) State

(a) Underground Storage Tanks (USTs)

Underground Storage Tanks are regulated under Subtitle I of RCRA and its regulations which establish construction standards for new UST installations (those installed after December 22, 1988), as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed.

The State regulates USTs pursuant to Health and Safety Code, Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to the State Water Resources Control Board (SWRCB) which has delegated authority to the Regional Water Quality Control Board (RWQCB) and typically on the local level, to the fire department. The LAFD administers and enforces Federal and State laws and local ordinances for USTs at the Project Site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD inspectors. If a release is documented that affects groundwater, the project file is transferred to the RWQCB for oversight.

(b) Oil and Gas Fields

The California Division of Oil, Gas and Geothermal Resources (DOGGR) is the State agency responsible for the oversight of drilling, operation, maintenance, plugging and abandonment of gas, oil and geothermal wells. DOGGR established a regulatory program for the management of these resources, emphasizing their responsible development through sound engineering practices that protect the environment, prevent pollution and ensure public safety. DOGGR recommends that construction of buildings over or in the proximity of plugged and abandoned oil wells should be avoided, and if not feasible, then plugging or re-plugging wells should be performed to current DOGGR standards. The Project Site does not contain active or abandoned gas, oil or geothermal wells.

(c) Asbestos-Containing Materials

In California, any facility known to contain asbestos is required to have a written asbestos management plan (also known as an Operations and Maintenance Program [O&M Program]). Removal of ACMs must be conducted in accordance with the requirements of South Coast Air Quality Management District (SCAQMD) Rule 1403. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

⁹ FAA Advisory Circular 70/7460-1L (December 4, 2015).

¹⁰ *Ibid.*

(d) Lead-based Paint

Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 establishes the rules and procedures for conducting demolition and construction activities and establishes exposure limits, exposure monitoring, and respiratory protection for workers exposed to lead.

(3) Local**(a) Methane Gas**

The County of Los Angeles Methane Gas Mitigation Standards, Title 26, Ordinance 110.3 and Ordinance 110.4 establishes requirements for buildings and enclosed structures located in areas classified as being either in a methane zone or methane buffer zone. The Landfill Gas Protection System ensures the safety of buildings and their occupants from gas generation/migration that exists on a site. Requirements for new construction within such zones include a gas control system, gas monitoring system, gas monitoring program, contingency plan, and a covenant and agreement. The County has prepared a Methane Package that details the codes and laws that pertain to methane gas for the County of Los Angeles.¹¹ The County also provides maps of major waste systems and oil/gas well locations within the County of Los Angeles. Pursuant to the County mapping, the Project Site is not located in a methane zone or methane buffer zone.

3. ENVIRONMENTAL IMPACTS**a. Methodology**

The evaluation of hazardous conditions and materials associated with construction and/or operation of the Project is based on the Project's Phase I Hazardous Materials Assessment, contained in Appendix E, prepared by Ninyo & Moore in April 2015. The Phase I Assessment identified the potential presence of hazardous materials occurring on the Project Site. The Phase I Assessment methodology included a site survey, visual observation, interviews regarding current property usage and conditions, review of historical information (historic records sources, historic aerial photographs and topographic maps, historic city directories, property tax files, Los Angeles County Department of Public Works (Building and Safety Division) records, and Sanborn Fire Insurance Rate Maps) and review of regulatory agency databases and files pertaining to the Project Site. The findings of the various reports and data base searches were reviewed to identify the potential hazardous impacts for construction and/or operation of the Project.

Impacts regarding potential impacts associated with oil fields and methane were evaluated by review of State regulatory guidelines and mapping of the location of such fields and zones. Impacts regarding high-rise building effects on air operations were based on review of FAA regulations.

b. Thresholds of Significance

The potential for hazards and hazardous materials impacts is based on thresholds derived from the County's Initial Study Checklist questions, which are based in part on Appendix G of the State CEQA Guidelines. These questions are as follows:

(IX) Hazards and Hazardous Materials. Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- h) 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?

The County determined in the NOP/IS prepared for the Project (see Appendix A of this Draft EIR) that the proposed Project would have no impact with respect to Checklist question h). Accordingly, this environmental topic is not evaluated in this EIR. Based on the above factors, the Project would have a potentially significant impact on Hazards and Hazardous Materials if it would:

- HAZ-1** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- HAZ-2** Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.
- HAZ-3** Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

¹¹ <https://dpw.lacounty.gov/epd/swims/docs/pdf/methane/Methane%20Packet.pdf>

- HAZ-4** Result in a safety hazard for people residing or working in the project area, for projects 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; or within the vicinity of a private airstrip.
- HAZ-5** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

c. Project Characteristics or Design Features

The Project would include demolition and renovation activities associated with different buildings on the Harbor-UCLA Medical Center Campus, leading to an increase of approximately 1,178,071 square feet of developed floor area. The Project would also introduce ongoing operations that would involve the use of common chemicals/materials associated with normal hospital and medical research uses. As cited in the Regulatory Section above, improvements to the Harbor-UCLA Medical Center Campus would be implemented in compliance with regulatory compliance measures that provide safety from potential contact with hazardous materials. Demolition/construction activities would be implemented pursuant to compliance measures that address potential contamination of earth and other on-site utility facilities, and Project operations would be subject to compliance measures for the handling of common household hazardous waste materials, and non-use of hazardous materials.

See Chapter 2.0, Project Description, in this Draft EIR for more information, including but not limited to: Figure 2-4, Existing Campus Buildings; Figure 2-6, Harbor-UCLA Medical Campus Master Plan Site Plan; and Table 2-1, Harbor-UCLA Master Plan Project - Existing and Proposed Land Use Summary.

d. Project Impacts

(1) Hazardous Materials Management

Threshold HAZ-1: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact Statement HAZ-1: *Project construction involves the demolition of existing buildings, grading, and excavation, which could result in the potential release into the environment of hazardous materials during removal and/or remediation of existing on-site USTs, ASTs, PCBs, ACMs, and LBP, or the disturbance of on-site soil that may be contaminated by past USTs on the Campus or underlying groundwater that may be contaminated by nearby off-site LUSTs. These represent potential environmental concerns on the Harbor-UCLA Campus and their disturbance is considered a potentially significant impact. Project operations would require the storage, use, and disposal of limited quantities of hazardous materials and waste routinely used in hospitals and related facilities, in a manner consistent with manufacturer's recommendations and applicable regulatory requirements. The potential for upset and accidental conditions resulting in the release of these materials is low and related impacts are considered less than significant.*

The Harbor-UCLA Medical Center Campus Master Plan Project would include the following: (1) a New Hospital Tower; (2) new and renovated outpatient care facilities (to be provided in new outpatient buildings and in portions of the renovated Existing Hospital Tower); (3) other services and facilities, including

administrative office, warehouse/storage areas, day care, limited commercial services (e.g., coffee stand, sundry shop); (4) long-term buildout of the LA BioMed Campus; (5) new Bioscience Tech Park; and (6) Medical Center Campus support facilities, including new and renovated infrastructure, utilities, parking, roadways, and pedestrian and bicycle circulation improvements. Some existing buildings would be demolished and replaced while others, such as the Existing Hospital Tower, would be modified for different uses. Project construction, to be implemented in phases over the course of approximately 15 years, would require the remediation of buildings and equipment identified as having ACMs, LPB, and PCBs; the removal and/or relocation of USTs and ASTs that presently contain, or have contained in the past, fuels and other potentially hazardous materials; and the disturbance of soil potentially contaminated with hazardous materials as the result of on-site or off-site LUSTs. Remediation of these materials would be conducted by qualified professionals in accordance with regulations governing these activities, including SCAQMD's Rule 1403 (ACBMs); Cal-OSHA rules (LBP); the federal Toxics Substances Control Act (PCBs); and, for USTs, RCRA Subtitle I, the State Health and Safety Code, and LAFD's enforcement of the State's applicable CCR regulations, with oversight by the RWQCB where groundwater may be affected. Nonetheless, construction-related activities have the potential to result in accidental upset and release of hazardous materials into the environment, which is a potentially significant impact.

Construction also would involve the short-term use and disposal of hazardous substances such as paint, adhesives, surface coatings, finishing materials, and cleaning agents during building finishing activities. The use and disposal of such materials would take place in accordance with applicable federal, state, and local regulations governing health and safety and such activities are not anticipated to create a significant hazard to the public or environment. Related impacts would be less than significant.

Project operations would involve the use and storage of limited quantities of hazardous materials such as cleaning solvents, painting supplies, and pesticides used for landscaping. Additionally, waste generated by general hospital operations typically includes regulated medical waste, "sharps" containers, pharmaceutical waste, chemo waste, and pathological waste, and the nature of future hospital operations on the Campus will not significantly differ from existing daily operations. Furthermore, future expanded LA BioMed operations and operation of the proposed Biotech Science Campus on the Harbor-UCLA Campus would involve the use of limited quantities of potentially hazardous materials typical of those used in biomedical research facilities. All potentially hazardous materials and waste handled on the Harbor-UCLA Campus would be used, stored, and disposed of in accordance with manufacturer instructions and applicable federal, state, and local health and safety regulations. Accordingly, impacts related to the routine transport, use, and disposal of such materials would be less than significant.

Mold, radon, and lead in drinking water were not considered to represent an environmental concern at the Project Site. The Project Site is also not located within a methane hazard site or buffer zone. Project implementation would, therefore, result in less than significant impacts with respect to these hazards.

Threshold HAZ-2: Would the Project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school?

Impact Statement HAZ-2: *As discussed under Threshold/Impact Statement HAZ-1, Project construction has the potential to result in the accidental release of hazardous materials related to the removal and/or remediation of existing on-site USTs, ASTs, PCBs, ACMs, and LBP, as well as the disturbance of on-site*

soil and/or groundwater that may be contaminated by nearby off-site LUSTs, which represent potential recognized environmental concerns on the Harbor-UCLA Campus. There are no schools within a quarter-mile of the Harbor-UCLA Campus and impacts related to the emissions or handling of hazardous materials in close proximity to schools would be less than significant. However, a child care facility located immediately north of the Medical Center Campus, which could be potentially affected by accidental releases of hazardous materials. As such, impacts in this regard are considered potentially significant.

There are 11 public schools within a three-mile radius of the Harbor-UCLA Campus, but no public or private schools within a quarter-mile. Although Project construction activities could result in the release of hazardous materials, such releases would not take place within a quarter-mile of an existing or proposed school and the potential for impacts on schools would be less than significant. Although no public or private schools are located in proximity to the Medical Center Campus, the Harbor-UCLA Kindercare child care center is located along the north side of Carson Street approximately 200 feet north of the Medical Center Campus. Since construction activities would have a limited potential to result in the incidental release of existing sources of contamination, and thus could affect children and staff at the facility, impacts to the existing child care facility would be considered potentially significant. However, implementation of applicable mitigation measures identified below would reduce the potential for adverse effects on the existing child care center to acceptable levels.

Threshold HAZ-3: Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment?

Impact Statement HAZ-3: *Harbor-UCLA is listed on several environmental databases due to inconclusive documentation regarding proper remediation and site closure following 1994 removal of five on-site USTs, as well as the presence of Large and Small Quantity Generators of hazardous waste on the Campus. Four adjacent off-site properties to the east were also listed due to the potential for LUST petroleum hydrocarbon contamination of underlying groundwater. As stated under Threshold/Impact Statement HAZ-1, construction could result in the release of hazardous materials due to disturbance of potentially contaminated on-site soil and/or groundwater; this is a potentially significant impact. Hazardous waste generated during Project operations is not considered a hazard to human health or the environment and related impacts would be less than significant.*

At the locations of five USTs removed in 1994, some staining and moderate hydrocarbon contamination of nearby soil samples were observed, according to the Phase I Assessment prepared for the Harbor-UCLA Campus. Documentation of cleanup activities at this location does not extend past 2000 and it is not clear whether proper soil excavation, soil vapor remediation, and site closure were completed. Moreover, the potential extent of possible contamination of underlying groundwater with petroleum hydrocarbons originating with nearby off-site LUSTs is not known, although the potential for Project-related excavation to intercept groundwater at depths of 48-60 feet bgs, or historic high groundwater at 30 bgs, is low. Nonetheless, Project construction activities have the potential to result in a significant hazard to the public or environment as the result of disturbance of potentially contaminated soil and groundwater due to the unknown cleanup status of the documented USTs. This is considered a potentially significant impact.

(2) Airport Safety Provisions

Threshold HAZ-4: Would the Project result in a safety hazard for people residing or working in the project area if the Project Site is 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; or within the vicinity of a private airstrip?

Impact Statement HAZ-4: *Harbor-UCLA is not located within an airport land use plan or the vicinity of a private airstrip; the nearest public airports are between four and 11 miles away. The Project proposes relocation of the existing helistop to a temporary and, ultimately, permanent location on the Harbor-UCLA Campus during Master Plan Project buildout. Helistop operations during construction and following buildout would not differ substantively from existing helistop operations in terms of the number of flights, composition of the helicopter fleet, or proposed flight paths. Project-related safety hazards due to airport or helistop operations would be less than significant.*

The nearest airports to the Harbor-UCLA Campus include Zamperini Field in Torrance (four miles away), Hawthorne Municipal Airport (seven miles away), Compton/Woodley Airport (nine miles away), and Los Angeles International Airport (eleven miles away). Because of this distance, Project operations, including helicopter operations, are not anticipated to interfere with operations of these or any other airports or airstrips.

(3) Emergency Response Plans

Threshold HAZ-5: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Statement HAZ-5: *Impacts regarding emergency response plans would be less than significant. The Project would not use hazardous materials or have on-site hazardous conditions that would conflict with or obstruct implementation of any emergency response plans. Further, the Project would not interfere with emergency access routes.*

There are no current or anticipated future conditions on the Harbor-UCLA Campus that would impair implementation of any existing emergency response plans or evacuation plans. The presence of potential and recognized environmental conditions such as PCBs, ACMs, and LBP in on-site buildings and the removal of ASTs and USTs and any associated soil or groundwater contamination, would be adequately addressed through required compliance with regulations governing public health and safety, as previously discussed under Threshold/Impact Statement HAZ-1.

The Project would not require the use of hazardous materials for construction, other than such materials as paint, surface coatings, and other materials during building finishing activities, as discussed under Threshold/Impact Statement HAZ-1. With respect to operations, the use and disposal of such hazardous materials as cleaning solvents, painting supplies, and pesticides, as well as medical waste and hazardous materials associated with biomedical operations, would take place in accordance with applicable federal, state, and local regulations governing health and safety and such activities are not anticipated to create a significant hazard to the public or environment. Related impacts would be less than significant.

The Project would implement on-site provisions for public safety, including plans to address on-site emergency incidents. For further discussion, refer to Section 4.K.1, Fire Protection and Emergency Medical Services, and Section 4.K.2, Police Protection.

Implementation of the Master Plan Project would not adversely affect existing emergency access routes. Although Campus ingress and egress would be modified to create distinctions between access and parking for the general public and staff, including a new signalized public entrance on Carson Street as well as an unsignalized staff entrance on Vermont Avenue would be created. Vehicular access and circulation would avoid conflicts with traffic movements on local roadways and would facilitate the provision of on-site emergency services. During construction, adjacent streets may be temporarily affected due to construction activity, such as temporary lane closures. Such occurrences would be implemented in accordance with a construction traffic management plan, as stated in Section 4.L., Transportation and Traffic, of this Draft EIR which would allow for responses to emergency accessibility needs. The existing helistop would be temporarily relocated to the western end of the Campus during construction of the New Hospital Tower, and accommodations would be made to patient transport between the temporary helistop and Existing Hospital, until such time as the new permanent helistop is operational as part of the New Hospital Tower.

These Project features, together with regulatory compliance, would avoid the need to generate new emergency plans beyond those that would normally be implemented to address on-site emergency situations, and would avoid adverse impacts regarding the implementation of existing evacuation plans. Related impacts would be less than significant.

e. Cumulative Impacts

As described under Existing Conditions, the Phase I Assessment identified all potentially hazardous conditions in the Project vicinity and concluded that based on distance, topography, assumed groundwater gradient, current regulatory status, and/or the absence of reported releases, none of the sites surrounding the Project Site listed in agency databases are considered to represent a likely past, present, or material threat of release that would adversely affect the Project Site. This would also be the case for development on nearby properties.

All development in the Project vicinity would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials as the Harbor-UCLA Master Plan. Therefore, with adherence to such regulations, the Project's incremental contribution to cumulatively significant impacts, considered together with related projects, would be less than cumulatively considerable.

Implementation of Project Design Feature PDF-TRAF-1, which requires the development of a construction traffic management plan for Project components that could require off-site lane closures and traffic detours, would ensure the Project's contribution to cumulatively significant emergency or evacuation plans would be less than cumulatively considerable.

4. MITIGATION MEASURES

The following mitigation measures are required to reduce potential impacts described in the Impact Statements HAZ-1, HAZ-2, and HAZ-3 to a less than significant level.

MM-HAZ-1: The abatement of ACMs, LBP, and PCBs in existing on-site buildings shall be conducted in accordance with the recommendations of the Hazardous Building Materials Survey prepared for the Harbor-UCLA Campus, which are as follows:

- The identified ACMs and surfaces containing LBP shall not be disturbed. Prior to renovation or demolition activities which would disturb identified ACMs, and LCSs, a licensed abatement removal contractor shall remove the ACMs and LCS, and perform paint stabilization activities as needed. The licensed abatement contractor must maintain current licenses as required by applicable state or local jurisdictions for the removal, transporting, disposal, or other regulated activities.
- The identified surface containing LBP shall not be disturbed. Any LBP in a non-intact condition shall be abated or the component properly removed or encapsulated. Lead containing ceramic tiles shall be removed prior to demolition activities. Any lead related removal activities shall be performed in accordance with the OSHA Lead in Construction Standard, Title 8 California Code of Regulations (CCR) 1532.1.
- Proper LBP waste stream categorization is required. Prior to any demolition activities, a composite sample of the representative LBP material (ceramic tiles and loose and flaking paint) shall be analyzed for total lead for comparison with the Total Threshold Limit Concentration in accordance with EPA reference method SW-846. If the concentration of total lead is greater than or equal to 1,000 milligrams per kilogram (mg/kg), the LBP waste material must be disposed at a landfill which can receive such wastes. If the concentration is less than 50 mg/kg the sample may be disposed as construction debris, if it is to remain in California. If the total lead result is greater than or equal to 50 mg/kg and less than 1,000 mg/kg, the sample must be further analyzed for soluble lead by the Waste Extraction Test for comparison with the Soluble Threshold Limit Concentration as described in Title 22 CCR 66261.24a. Additionally, if the result is greater than or equal to 100 mg/kg the sample must be further analyzed for leachable lead by the Toxicity Characteristic Leaching Procedure for comparison with the Resource Conservation and Recovery Act (RCRA) limits. Based on the results of the soluble and leachable analysis the waste material may require disposal as a RCRA-Hazardous waste or non-RCRA- (California-) Hazardous waste.
- Miscellaneous hazardous building materials shall be removed and properly recycled or disposed by the licensed abatement contractor prior to renovation or demolition activities. Contractor shall provide proper manifesting for all hazardous materials removed and recycled to prove the disposal of all materials was completed in accordance with local, state, and federal requirements.
- Abatement monitoring consulting services shall be performed by a third-party environmental consultant, to include oversight of abatement contractor activities to be performed in accordance with the abatement specifications, daily air monitoring, clearances (asbestos and lead), verification of complete removal of hazardous materials, and preparation of a closeout report summarizing the abatement activities.

MM-HAZ-2 Prior to initiation of excavation and grading activities in the areas identified in the Phase I Assessment as containing potential soil contamination or for which site closure is not confirmed (from either on- or off-site USTs/LUSTs or ASTs), Harbor-UCLA shall retain a

qualified environmental consultant to prepare a Soils Management Plan for each development phase to be submitted to the Los Angeles County Fire Department for review and approval. The Soils Management Plan shall be implemented during excavation and grading activities for proposed improvements in the areas identified in the Phase I assessment as containing potential soil contamination to ensure that site closure is properly implemented and any contaminated soils encountered are properly identified, removed and disposed of off-site. The plan shall include the following:

- A qualified environmental consultant shall be present as necessary during grading and excavation activities to monitor compliance with the Soils Management Plan and to actively monitor the soils and excavations for evidence of contamination.
- Any soil encountered during excavation or grading activities that appears to have been affected by hydrocarbons or any other contamination shall be evaluated, based upon appropriate laboratory analysis, by a qualified environmental consultant prior to off-site disposal at a licensed facility.
- All identified contaminated soils shall be properly removed, handled and transported to an appropriately licensed disposal facility, in accordance with the Soils Management Plan prepared for each respective development phase.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potentially significant impacts related to hazards and hazardous materials would be less than significant with compliance with applicable regulatory requirements and implementation of the required mitigation measures.

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