

3.6. HAZARDS AND HAZARDOUS MATERIALS

This section provides an overview of hazards and hazardous materials and evaluates the construction and operational impacts associated with the Proposed Project. The term “hazardous materials” can have varying definitions for different regulatory programs. For the purpose of the following analysis, the term “hazardous materials” refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501 define hazardous materials as follows:

“Hazardous Material means a material... that, because of its quantity, concentration, 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.”¹

Hazardous materials include but are not limited to: (1) hazardous substances, (2) hazardous products, (3) hazardous waste, and (4) 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.”

3.6.1. REGULATORY FRAMEWORK

3.6.1.1. Federal

U.S. Environmental Protection Agency (USEPA)

The USEPA’s mission is to protect human health and the environment. The USEPA’s purpose is to ensure that all Americans are protected from significant risks to human health and the environment in which they live, learn, and work. The USEPA is an integral consideration in U.S. policies concerning natural resources, human health, economic growth, energy, transportation, agriculture, industry, and international trade. The USEPA’s Integrated Risk Information System (IRIS) program supports its mission by identifying and characterizing the health hazards of chemicals found within the environment, and each IRIS assessment covers a chemical, a group of related chemicals, or a complex mixture. Oversight of chemical storage and manufacturing in coordination with their partner agencies remains a key focus of the USEPA, as well as efforts to reduce urban air toxics.²

3.6.1.2. State

Department of Toxic Substances Control (DTSC)

Authority for the statewide administration and enforcement of Resource Conservation and Recovery Act (RCRA) rests with the DTSC of the Cal/EPA. While the DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials,

¹ California Health and Safety Code, Section 25501.

²USEPA, *Basic Information about the Integrated Risk Information System*, <https://www.epa.gov/iris/basic-information-about-integrated-risk-information-system>, accessed December 12, 2017.

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.³

The storage of hazardous materials in underground storage tanks (USTs) is regulated by Cal/EPA's 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 local fire department.

Asbestos Regulations

The CCR regulates asbestos exposure for workers as defined in Section 1502 of the California Division of Occupational Safety and Health's Title 8 regulations, including demolition or salvage of structures where asbestos is present; removal or encapsulation of materials containing asbestos; construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos; installation of products containing asbestos; asbestos spill/emergency cleanup; transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed; and excavation that may involve exposure to asbestos as a natural constituent that is not related to asbestos mining and milling activities.

Lead Regulations

Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. State-certified contractors must perform inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations.

3.6.1.3. Local

Certified Unified Program Agency (CUPA)

The CUPA, which has the responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management, is the Environmental Health Division of the County Health Department. The Unified Program is the consolidation of six State environmental regulatory programs into one program under the authority of a CUPA. A CUPA is a local agency that has been certified by Cal/EPA to implement these programs within the local agency's jurisdiction. This program was established under the amendments to

³California Department of Toxic Substances Control, *DTSC: Who We Are and What We Do*, http://www.dtsc.ca.gov/InformationResources/DTSC_Overview.cfm, accessed March 3, 2018.

the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory
- California Accidental Release Prevention
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks
- Aboveground Storage Tanks (Spill Prevention Control and Countermeasures requirements)
- Uniform Fire Code Article 80 Hazardous Material Management Program and Hazardous Material Identification System

Los Angeles Fire Department (LAFD)

The LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities that 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.

City of Los Angeles

The Methane Seepage Regulations, contained within LAMC Chapter IX, Article 1, Division 71 (Sections 91.7101 through 91.7109), establish requirements for mitigation and other general building requirements to prevent potential environmental and harmful health effects that could be caused by the construction of buildings located in a defined Methane Hazard Zone within the City. All new buildings and paved areas located in a Methane Zone or Methane Buffer Zone must comply with the requirements of LAMC Sections 91.7103 and 91.7104 and the Methane Mitigation Standards established by the Superintendent of Building. The Methane Mitigation Standards identify installation procedures, design parameters and test protocols for the methane gas mitigation system.

South Coast Air Quality Management District (SCAQMD)

The SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures and handling and cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of asbestos containing structures, asbestos storage facilities, and waste disposal sites. SCAQMD also regulates VOC emissions from contaminated soil through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 sets requirements to

control the emission of VOCs from excavating, grading, handling, and treating soil contaminated with VOCs as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

3.6.2. EXISTING SETTING

The following is a brief description of former and current land uses on the Project Site that could potentially result in the release of hazards and hazardous materials during construction and operation of the Proposed Project. The hazards and hazardous materials that could potentially be encountered in each area of the Project Site are listed in Table 3.6-1. The table also identifies properties associated with the Methane Zone and Methane Buffer Zone.

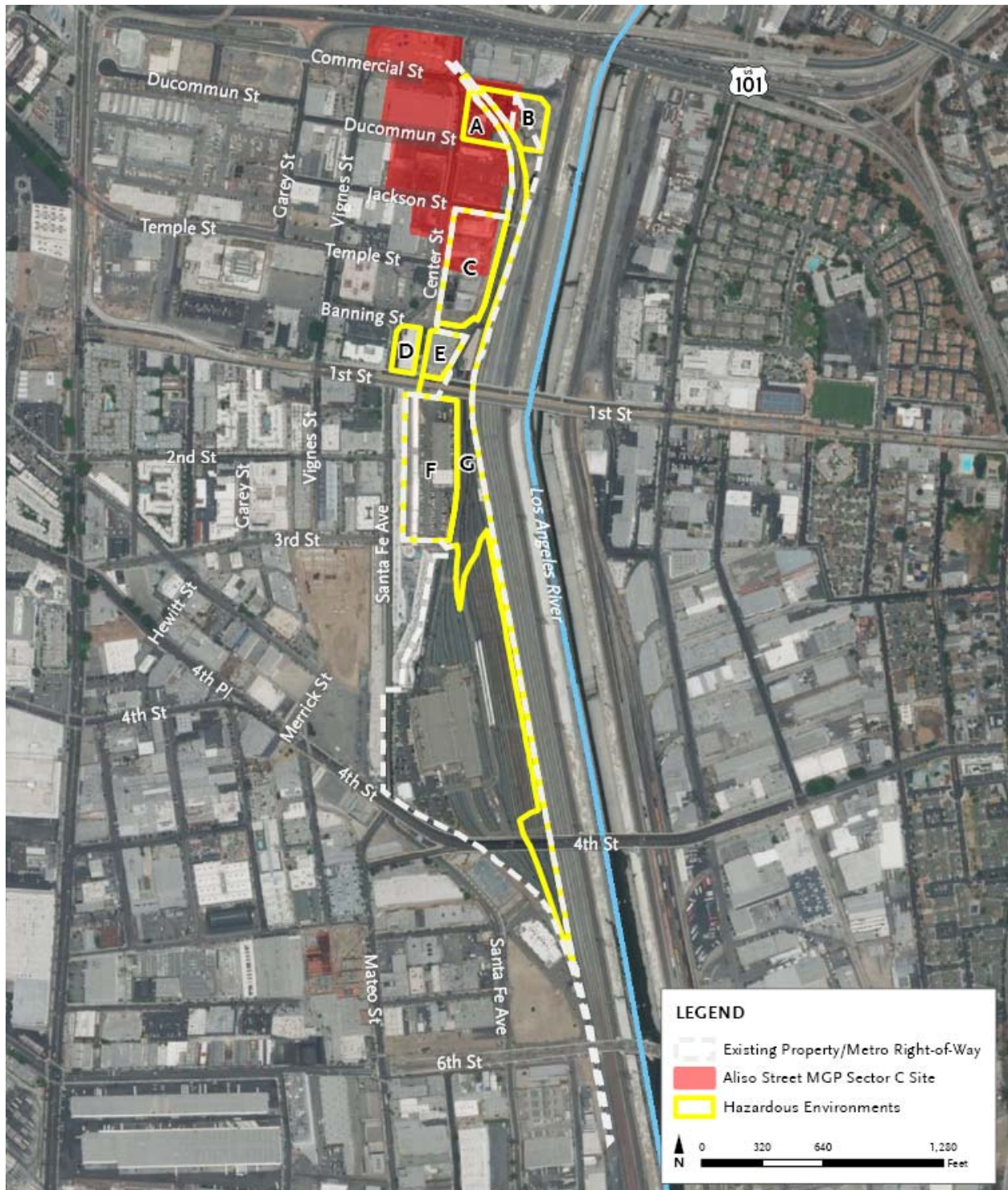
Table 3.6.1. Hazardous Environments within the Project Site

Hazardous Environment on Figure 3.6.1	Current Use	Potentially Present Hazards and Hazardous Materials
A	Los Angeles Police Department (LAPD) Viertel's Central Division Police Garage	1, 2, 3, 4, 5, 6, 7, 9, 10
B	Temporary Storage Area (TSA)	1, 2, 5, 8, 9, 10
C	National Cold Storage Facility (Vacant)	1, 2, 3, 4, 5, 6, 7, 8, 9
D	Commercial Building at 100-120 North Santa Fe Avenue (Vacant)	3, 4, 5, 6, 7, 9
E	Citizens Warehouse/Lysle Storage Company Building (Vacant)	3, 4, 6, 7, 9
F	MOW Operations, Parking, and Material Management	2, 3, 4, 5, 6, 7, 8, 9
G	Division 20 Rail Yard Train Tracks	2, 5, 6, 7, 8, 9

- 1) Former Aliso Street Manufactured Gas Plant (MGP) by-products (i.e., Polycyclic Aromatic Hydrocarbons [PAHs], VOCs, and heavy metals)
- 2) Total Petroleum Hydrocarbons (TPH)
- 3) Asbestos-containing building materials
- 4) Lead-based Paint (LBP)
- 5) Asbestos-Containing Materials (ACM) in sub-grade utilities
- 6) Polychlorinated Biphenyl (PCB)-containing building materials
- 7) Universal Waste
- 8) Treated Wood Waste (TWW)
- 9) Methane Zone (as defined by the Los Angeles Department of Building and Safety (LADBS))
- 10) Methane Buffer Zone (as defined by LADBS)

Source: GlobalASR, 2018; Terry A. Hayes Associates Inc., 2018.

Figure 3.6.1 Hazardous Environments on the Project Site



NOTE: Hazardous environment boundaries were defined based on current use and potentially present hazards and hazardous materials.
Source: Terry A. Hayes Associates Inc., 2018; Department of Toxic Substances Control, 2002.

Retired Hazardous Land Uses on the Project Site

The Proposed Project is located in an area that has historically been used for industrial and railroad purposes. Between the late 1880s and the early 1930s, the Southern California Gas Company (SoCal Gas) owned and operated a manufactured gas plant (MGP) known as the Aliso Street MGP in the vicinity of the Project Site. Among other structures, the Aliso Street MGP contained a large aboveground gasholder (approximately six million cubic feet in capacity) and water cooling towers. In 1942, under a contract to the U.S. Defense Plant Corporation, SoCal Gas converted much of the Aliso Street MGP facility to produce butadiene, a raw material used in the manufacture of synthetic rubber. Butadiene production continued at this facility until 1947. Most of the butadiene plant facilities were demolished in 1952, except for the large gasholders that were removed in 1973.⁴ The approximate location of the closest portion (Sector C) of the Aliso Street MGP is shown in red on Figure 3.6.1. The Proposed Project's portal widening and storage tracks would occur in a portion of this area.

Further south on the Project Site is the location of the former National Cold Storage facility. Associated buildings were predominantly used for poultry processing and storage, freezer storage, warehouse, office, and equipment storage between 1892 through the 1980s.⁵ To support these functions, the property was developed with paved parking and loading docks, a rail spur, a network of refrigeration and cooling pipes, and other associated equipment.⁶ Due to the time period of construction of the former National Cold Storage facility, ACMs and LBP could be encountered during demolition. The location of the National Cold Storage facility is indicated by the letter "C" on Figure 3.6.1. Some of the Proposed Project's storage tracks would be constructed in this area.

South of the former National Cold Storage facility is the Citizens Warehouse/Lysle Storage Company building. This building was built in the latter part of the 19th century and was originally used as a pickling factory before being converted for paper manufacturing, and later, other industrial uses.⁷ Due to the time period of construction of the building, ACMs and LBP could be encountered during demolition. The location of the Citizens Warehouse/Lysle Storage Company building is indicated by the letter "E" on Figure 3.6.1. Some of the Proposed Project's storage tracks would be constructed in this area.

All other portions of the Project Site are currently in use and are described below.

Current Land Uses on the Project Site

Today, the majority of the Project Site is occupied by the existing Division 20 Rail Yard, where Metro Red and Purple Line vehicle maintenance occurs. There have been railroad tracks and railroad spurs in this area since the latter part of the 19th century.⁸ Due to the age of these

⁴GlobalASR, *Division 20 Portal Widening/Turnback Facility Project Hazardous Materials Technical Memorandum*, 2017.

⁵ICF International, *Division 20 Portal Widening/Turnback Facility Project Historical Resources Technical Memorandum*, 2017.

⁶GlobalASR, *Division 20 Portal Widening/Turnback Facility Project Hazardous Materials Technical Memorandum*, 2017.

⁷ICF International, *Division 20 Portal Widening/Turnback Facility Project Historical Resources Technical Memorandum*, 2017.

⁸GlobalASR, *Division 20 Portal Widening/Turnback Facility Project Hazardous Materials Technical Memorandum*, 2017.

tracks, soil in the area may have been contaminated by polycyclic aromatic hydrocarbons (PAHs), VOCs, and heavy metals.⁹ The location of the Division 20 Rail Yard within the footprint of the Proposed Project is indicated by the letters “F” and “G” on Figure 3.6.1. The Proposed Project’s track reconfiguration and storage track construction would occur in this area.

Currently in operation on the Project Site are the LAPD Viertel’s Central Division Police Garage, Metro’s Temporary Storage Area, and a commercial property at 100-120 North Santa Fe Avenue. The former two areas are used for the parking of vehicles and associated office activities, and their locations within the footprint of the Proposed Project are indicated by the letters “A” and “B” respectively on Figure 3.6.1. The Proposed Project’s portal widening would occur in this area. The commercial property at 100-120 North Santa Fe Avenue is indicated by letter “D” on Figure 3.6.1. The Proposed Project would occupy this property with displaced MOW administrative activities.

3.6.3. THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Project would have a significant impact related to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- 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 it create a significant hazard to the public or the environment;
- Be 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, and result in a safety hazard for people residing or working in the project area;
- Be located within the vicinity of a private airstrip, and 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.

⁹GlobalASR, *Division 20 Portal Widening/Turnback Facility Project Hazardous Materials Technical Memorandum*, 2017.

3.6.4. IMPACT ANALYSIS AND MITIGATION MEASURES

This section assesses potential impacts associated with the Proposed Project and, if necessary, identifies mitigation measures to eliminate or reduce impacts. The methodology implemented in this assessment consists of evaluating whether the Proposed Project would have significant hazards and/or hazardous materials impacts according to the aforementioned thresholds.

Impact 3.6.1 Would the Proposed Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Analysis

Less-than-Significant Impact with Regulatory Compliance (Construction); Less-than-Significant Impact (Operations). The potential for significant public or environmental hazards resulting from routine transport, use, or disposal of hazardous materials was evaluated individually for construction and operations based on the differences in pertinent environmental concerns.

Construction

The Proposed Project would demolish and/or renovate 306,875 square feet of existing buildings in Hazardous Environments A, C, D, E, and F. The demolition process would require the transport and disposal of hazardous waste. Some of the anticipated demolition-related hazardous waste (i.e., batteries and mercury-containing lamps and thermostats) is known as “universal waste” and can be recycled and is of low risk to the public or environment. Other anticipated hazardous waste (e.g., ACMs, LBP, PCB) is of higher risk and can pose a significant hazard to the public or environment. The Proposed Project would also excavate approximately 100,000 cubic yards of soil associated with leveling and portal widening. This excavation, in addition to the removal and modification of the 1st Street Bridge piers and superstructure, would require the transport of soil that has been contaminated by PAHs, VOCs, TPHs, and heavy metals during Aliso Street MGP operations and two centuries of rail activity.

The Proposed Project would construct new storage tracks, reconfigure existing tracks to accommodate a turnback facility, install a new traction power substation and an emergency backup power generator. Most hazardous waste generated during construction (e.g., TWW, unused or off-specification paint and primer, paint thinner, solvents, and vehicle and equipment maintenance-related materials) is of low risk and can be recycled. However, construction equipment may drip small quantities of hazardous materials (e.g., fuel oil and grease) and contaminate soil that would need to be discarded.

The use and transport of hazardous materials is strictly regulated by local, State, and federal agencies, including the California Division of Occupational Safety and Health, the City of Los Angeles Fire Code, SCAQMD, and all other federal, State, and local regulations. Metro would be required to comply with all relevant rules and regulations, some of which are listed below. Compliance with regulatory control measures would ensure that the Proposed Project would

result in a less-than-significant impact related to the transport, use, or disposal of hazardous materials during construction.

- ACMs, lead-based paint, polychlorinated biphenyl, TWW, and universal waste would be removed, segregated, and disposed by licensed contractors in accordance with the 1994 Federal Occupational Exposure to Asbestos Standards, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), Title 22 of the CCR Division 4.5 (Hazardous Waste), the U.S. Department of Housing and Urban Development Lead-Based Paint Guidelines, and Title 40 of the CFR Part 761.
- In the event that large quantities of fuel oil and grease are spilled, Metro would be required to notify the appropriate local, State, or federal authorities. Such spills would be controlled as quickly as is practical to minimize the footprint of the spill. Soil and materials contaminated during the spill would be placed into drums for offsite disposal.
- Pursuant to SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil), Metro would be required to obtain a plan to minimize VOC emissions to the atmosphere during excavation and any subsequent handling of contaminated soil. Metro would implement all control measures outlined in this plan, including those that pertain to the excavation of soils contaminated with VOCs and total petroleum hydrocarbons.
- The excavation and transport of soils contaminated by heavy metals (e.g., lead) would be managed according to SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants).

Operations

Operation of the Proposed Project would involve the occasional use, storage, and disposal of hazardous materials that could include limited quantities of vehicle fuels, oils, transmission fluids, paints, solvents, cleaners and pesticides. The Proposed Project would not generate significant amounts of hazardous materials that would require routine transport, use, or disposal. Therefore, the Proposed Project would result in a less-than-significant impact related to the transport, use, and disposal of hazardous materials during operations.

Mitigation Measures

This impact would be less than significant and does not require mitigation measures.

Impact 3.6.2 **Would the Proposed Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Impact Analysis

Less-than-Significant Impact with Regulatory Compliance (Construction); Less-than-Significant Impact (Operations). The potential for significant public or environmental hazards resulting from reasonably foreseeable upset or accident conditions involving the release of

hazardous materials into the environment was evaluated individually for construction and operations based on the differences in pertinent environmental concerns.

Construction

Construction activities that involve substantial subsurface disturbance may present issues for methane or subterranean utilities under the Project Site. Portions of the Project Site are located within the methane buffer zone and the methane zone as defined by LADBS. Methane is regarded as hazardous due to its potential for explosion. In addition, several subterranean utilities may be disturbed during construction activities. Potentially vulnerable/intrusive dry utilities include electrical ducts, train systems and controls duct banks, train and yard communications duct banks, train signaling duct banks, and natural gas lines. Potentially vulnerable/intrusive wet utilities include the sewer as well as the existing Division 20 Rail Yard's fire water system, tunnel portal fire lines, and domestic water lines. These subterranean utilities would need to be relocated, modified, or protected if their location would cause them to be damaged during or interfere with construction. In the case of natural gas lines, inappropriate handling could result in explosion. Hazardous materials are strictly regulated by local, State, and federal agencies, including the California Division of Occupational Safety and Health, the City of Los Angeles Fire Code, and all other federal, State, and local regulations. Metro would be required to comply with all relevant rules and regulations, some of which are listed below. Compliance with regulatory control measures would ensure that the Proposed Project would result in a less-than-significant impact related to accident conditions involving the release of hazardous materials into the environment during construction.

- Pursuant to Section 91.7104.1 of the City of Los Angeles Methane Code (Ordinance Nos. 175790 and 180619), site testing of subsurface geological formations would be conducted by a Metro-approved testing agency under the supervision of a licensed architect or registered engineer or geologist. The licensed architect or registered engineer or geologist would be required to indicate the testing instruments used and testing procedure followed. The testing procedure would meet the Methane Mitigation Standards established by the Superintendent of Building.
- All paving work and building construction within the methane zone or methane buffer zone as defined by LADBS would be required to comply with Methane Mitigation Standards established by the Superintendent of Building as well as the requirements outlined in Sections 91.7103 and 91.7104 of the City of Los Angeles Methane Code (Ordinance Nos. 175790 and 180619).
- The utility conflict relocation study would be prepared, which would incorporate design criteria from the City of Los Angeles Department of Public Works, the City of Los Angeles Bureau of Engineering's Manuals and Standards, and the California Public Utilities Commission's policies, guidelines, and Rules of Practice and Procedure.

Operations

As discussed above, vehicle maintenance activities during the Proposed Project's operations would require the frequent use of routine detergents and cleansers. There is also potential for fuels, oils, and transmission fluids to drip or spill from Metro non-revenue vehicles in limited quantities. Accidental exposure to some of these chemicals can pose physical hazards (e.g., chemical burns) or health hazards (e.g., poisoning), which may give rise to acute or chronic illnesses. The properties and health effects of different chemicals are unique to each chemical and depend on the extent to which an individual is exposed. The exposure of individuals to hazardous materials would be limited by the limited quantities of these materials that would be stored and used on the Project Site. The Proposed Project would not include use or storage of chemicals that have the potential to result in an offsite upset or accidental event. Therefore, the Proposed Project would result in a less-than-significant impact related to accident conditions involving the release of hazardous materials into the environment during operation.

Mitigation Measures

This impact would be less than significant and does not require mitigation measures.

Impact 3.6.3 Would the Proposed Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Analysis

Less-than-Significant Impact with Regulatory Compliance (Construction); Less-than-Significant Impact(Operations). The potential for significant public or environmental hazards resulting from hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school was evaluated individually for construction and operations based on the differences in pertinent environmental concerns.

Construction

The Project Site has been investigated and contaminated materials are known to exist within the construction area. Contaminated materials would need to be transported to and disposed at appropriate facilities. The Felicitas & Gonzalo Mendez High School and Utah Street Elementary School are within one-quarter mile of the Project Site but located to the east across the Los Angeles River and not along the haul route. However, SCI-Arc is located within one-quarter mile of the Project Site and near construction activities. Students of this school could be exposed to hazardous construction materials. Hazardous materials are strictly regulated by local, State, and federal agencies, including the California Division of Occupational Safety and Health, the City of Los Angeles Fire Code, and all other federal, State, and local regulations. Metro would be required to comply with all relevant rules and regulations, some of which are listed above under Impact Statement 3.6.1. Compliance with regulatory control measures would ensure that construction of the proposed project would result in a less-than-significant impact related to the handling of hazardous materials within one-quarter mile of an existing school.

Operations

As discussed above, vehicle maintenance activities during the Proposed Project's operations would require the frequent use of hazardous materials such as detergents and cleansers. There is also potential for fuels, oils, and transmission fluids to drip or spill from Metro non-revenue vehicles in limited quantities. However, the potential for exposure to these hazards and hazardous materials would generally be limited to the Project Site within the Division 20 Yard and not students or staff at the aforementioned schools. The Division 20 Yard is staffed with personnel trained in spill response who follow a site-specific Hazardous Materials Business Plan. Metro staff is available 24-hours a day through the Quality Assurance Department to respond to hazardous materials releases, and Metro sites frequently undergo emergency response drills. There would be no hazardous emissions associated with operations of the Proposed Project. Therefore, the Proposed Project's operations would result in a less-than-significant impact related to hazardous emissions or the handling of hazardous materials and waste within one-quarter mile of an existing school during operations.

Mitigation Measures

This impact would be less than significant and does not require mitigation measures.

Impact 3.6.4 **Would the Proposed Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Impact Analysis

Less-than-Significant Impact with Regulatory Compliance (Construction); Less-than-Significant Impact (Operations). The potential for significant public or environmental hazards resulting from hazardous materials sites was evaluated individually for construction and operations based on the differences in pertinent environmental concerns.

Construction

The Project Site is located on the following DTSC sites that are identified on EnviroStor with the following IDs: 60000170, 60000171, 600001890, and 60000172. EnviroStor ID 60000170 refers to Block N of the Aliso Street MGP Sector C, where the Metro Bus Layover and Sheriff Facility is located. EnviroStor IDs 60000171 and 600001890 refer to Block K of the Aliso Street MGP Sector C, where LAPD Viertel's Central Division Police Garage and the Metro Red and Purple Line tunnel portal are currently located. Lastly, EnviroStor ID 60000172 refers to Blocks Q and R of the Aliso Street MGP Sector C, where the National Cold Storage facility is located. The Project Site contains several existing hazardous materials contaminations, which are identified in Table 3.6-1. Notably, soil could be contaminated with VOC and PAHs, and demolition debris could contain asbestos and lead. Hazardous site and hazardous materials are strictly regulated by local, State, and federal agencies, including the California Division of Occupational Safety and Health, the City of Los Angeles Fire Code, SCAQMD, and all other federal, State, and local regulations. Metro would be required to comply with all relevant rules

and regulations, some of which are listed above in Impact Statements 3.6.1 and 3.6.2. Compliance with regulatory control measures would ensure that the Proposed Project would result in a less-than-significant impact related to hazardous materials sites.

Operations

The hazardous site conditions for the Proposed Project related to Government Code Section 65962.5 are associated with contaminated soils and demolition debris. These hazardous conditions would cease after construction activity. Therefore, the Proposed Project would result in no impact related to operations associated with Government Code Section 65962.5.

Mitigation Measures

This impact would be less than significant and does not require mitigation measures.

Impact 3.6.5 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 Proposed Project result in a safety hazard for people residing or working in the project area?

Impact Analysis

No Impact. The Project Site is not within two miles of an airport. Therefore, the Proposed Project would result in no impact related to safety hazards associated with a public airport or public use airport.

Mitigation Measures

No impact would occur and mitigation measures are not required.

Impact 3.6.6 For a project within the vicinity of a private airstrip, would the Proposed Project result in a safety hazard for people residing or working in the project area?

Impact Analysis

No Impact. The Project Site is not within the vicinity of a private airstrip. Therefore, the Proposed Project would result in no impact related to safety hazards associated with private airstrips.

Mitigation Measures

No impact would occur and mitigation measures are not required.

Impact 3.6.7 Would the Proposed Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Analysis

Less-than-Significant Impact. The emergency/disaster routes defined by the County of Los Angeles Department of Public Works located nearest to the Project Site are 4th Street which runs through the Project Site, Alameda Street approximately one-half mile to the west, Soto Street approximately one mile to the east, Cesar Chavez Avenue and US-101 freeway directly adjacent to the northwest, and Interstate 10 approximately one-half mile to the south.¹⁰ The Proposed Project would not require the permanent closure of any of these streets and would not impede emergency vehicle access to the Project Site or surrounding area. Per State and local regulations, emergency vehicle access would be maintained at all times during construction and operation of the Proposed Project. Furthermore, the Proposed Project would provide a permanent emergency access road along the western border of the Project Site. Therefore, the Proposed Project would result in a less-than-significant impact related to emergency plans.

Mitigation Measures

This impact would be less than significant and does not require mitigation measures.

Impact 3.6.8 Would the Proposed Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Impact Analysis

No Impact. No portion of the Project Site is within or in close proximity to areas prone to wildland fires.¹¹ Therefore, the Proposed Project would result in a less-than-significant impact related to wildfires.

Mitigation Measures

No impact would occur and mitigation measures are not required.

¹⁰County of Los Angeles Department of Public Works, *Disaster Route Maps: City of Los Angeles Central Area*, August 13, 2008.

¹¹California Energy Commission, *Cal-Adapt, Wildfire*, 2018.