## E. HAZARDOUS MATERIALS

An Environmental Site Assessment – Phase I Update was performed on the subject properties by California Environmental Inc. in March 2000[1]. This report is included in **Appendix E** of this EIR. The scope of the report included a site reconnaissance, research of available land records, review of previous site assessment reports, and other sources for preliminary indications of hazardous material use, disposal, or storage on the subject property. The report found that:

- No evidence of aboveground or underground storage tanks, clarifiers, sumps, grease interceptors was observed,
- No evidence of hazardous substance use was observed,
- No evidence of spillage or residue of hazardous substance was observed,
- No evidence of disposal or fill of solid waste material was observed,
- No evidence of PCB containing transformers or equipment was observed,
- No evidence of wastewater treatment or disposal systems was observed, and
- No evidence of dry wells, irrigation wells, injection wells, oil wells, abandoned wells, monitoring wells, or other wells was observed on the subject property.

Hazardous Material impacts for the Project have been evaluated under four areas identified as potential risks: 1) Methane Gas and Oil Contamination, 2) Asbestos, 3) Groundwater, and 4) Lead - Based Paint.

### Existing Conditions

#### *Methane Gas and Oil Contamination*

Notice of Preparation (NOP) comments to the Los Angeles Department of City Planning identified areas of possible impact to include Natural Resources (Oil Field), Risk of Upset (Explosion/Release of Methane Gas), and Hazards (Excavation/Hauling of Contaminated Soil). Specifically, statements were made that the Proposed Project site is located over the existing Sawtelle Oil Field, and that therefore the location and scope of the Proposed Project may limit future access to the extraction of the natural resource. It was further noted that the area may be subject to potential risk of methane gas release, exposure or explosion. Lastly, it was commented that excavation and hauling of soils, which may be contaminated with oil and/or petroleum related gases, may pose a health hazard.

In response, the Project Applicant requested additional review by California Environmental Inc., a Registered Environmental Assessor II.[2] Contrary to the NOP comments, California Environmental found that the location of the Project site is not within the Sawtelle Oil Field, according to the Division of Oil and Gas and Geothermal Resources Map No. 117. The nearest oil producing wells are located within the Sawtelle Field, more than 3,600 feet to the west of the property. The nearest oil well is the "Moon" well, a plugged and abandoned dry hole drilled in 1908, located approximately 1,200 feet to the northwest of the proposed site. The Department of Building and Safety has been requiring Soil Gas Surveys for properties within 1,000 feet of an oil well. The

[1] Preliminary Environmental Site Assessment- Phase I Update, Pre-Demolition Asbestos Sampling and Groundwater Sampling, Commercial Property, Westwood California (see Appendix E of this EIR).

[2] Letter from California Environmental Inc. to Casden Properties Operating Partnership, LP, dated April 17, 2001 (see Appendix E of this EIR).

subject property is 200 feet beyond this threshold. Currently, the Department of Building and Safety is reviewing this guideline threshold. Their decision has not been reached as of the date of this EIR; however, the project Applicant has agreed that should the threshold be changed such that the study is required, the Applicant will perform the Soil and Gas Survey to the satisfaction of the Department of Building and Safety (including mitigation to the satisfaction of the department, if required) to assure no project related hazards.

***Asbestos***

The California Environmental Inc Environmental Site Assessment included a Supplemental Pre-Demolition Asbestos Inspection on the subject properties. The report identifies the presence of asbestos containing materials (ACM's) in the existing structures at 1070 Glendon Avenue (Glendon Manor) and 10870 Weyburn Avenue (commercial building). The commercial building was later demolished in the summer of 2002, utilizing all asbestos procedures required by federal and state agencies and the City of Los Angeles. Specifically, a pre-demolition inspection was completed and filed with the South Coast Air Quality Management District, and removal and disposal was performed by a licensed asbestos abatement contractor in accordance with applicable environmental asbestos abatement measures.

Consistent with Federal regulations, asbestos and ACM's are deemed to be present in all structures that have not been tested. Asbestos was commonly used for acoustic insulation, thermal insulation, and fireproofing, and is often found in ceiling tiles, pipe insulation, floor tiles, and linoleum. Asbestos is typically present in structures beyond 20 years of age.

Asbestos fibers are very strong and heat resistant. When broken apart, such as during demolition and construction activities, microscopic asbestos particles may become airborne and pose a threat to human health. Inhalation of asbestos fibers can lead to various health problems, the most serious of which include lung cancer.

***Groundwater***

The Environmental Site Assessment also included groundwater Sampling on the subject properties in order to conduct a preliminary characterization of groundwater that may be disposed of offsite during planned development. In January 2000, two geotechnical borings were excavated to a maximum depth of 100 feet below ground surface (bgs) and converted to groundwater monitoring wells. Groundwater samples were collected from each well to provide preliminary data for National Pollution Discharge Elimination System (NPDES) profiling of groundwater for dewatering during construction. Depth to groundwater was measured at 42 to 45 feet on two separate occasions in February 2000.

The subject property was not listed on the environmental databases researched for the report. There are no underground storage tank files, or industrial records maintained at the City of Los Angeles Fire Department. No evidence of use, storage, disposal or generation of large quantities of hazardous substances was observed onsite. There are no reported spills or releases of hazardous materials from offsite facilities. Analytical tests on groundwater samples found no detectable Volatile Organic Compounds (VOCs).

***Lead - Based Paint***

A lead-based paint study and survey, conducted in 1997 by Dames and Moore, was included in a Phase I Environmental Site Assessment for 1070 Glendon Avenue (the results are reported in the

California Environmental, Inc. Environmental Site Assessment (page 9)). The report found that one of nine lead-based paint samples was greater than the HUD action level of 0.5%. The sample was obtained from a window frame and contained 17.03% lead. Lead-based paint was found to be present universally in the window frames throughout the apartment building. Although not included in this lead-based paint study, the other buildings involved in the Project are assumed to possibly include lead-based paint due to their age. The commercial building was demolished in the summer of 2002, utilizing all lead-based paint procedures required by federal and state agencies and the City of Los Angeles.

***Threshold of Significance***

The LA CEQA Thresholds Guide states that the determination of significance for Hazardous Materials issues shall be made on a case by case basis considering the following factors:

- The regulatory framework for a health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

A second part of the threshold of significance was added, considering issues relevant to the Proposed Project and relevant portions of the current CEQA Appendix G, as follows:

The Project would additionally have a significant impact if:

- The project would create a significant hazard to the public or the environment through the routine transportation, use, or disposal of hazardous materials; or
- The project would 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; or
- The project would expose people to a significant health risk by the emission of hazardous materials during demolition and/ or construction activities.

**Project Impact**

***Methane Gas and Oil Contamination***

Construction of the proposed property will not limit access to the Sawtelle Oil Field, because the field is located west of the property, and wells within the Field are directionally drilled to reach the oil- producing zone. Because the oil field and nearest producing wells are located over 3,600 feet to the west of the proposed site, the risk of methane gas hazards is not expected. In fact, the soils report shows that no evidence of hydrocarbon odors or staining of soil was observed during drilling of geotechnical borings on the subject property. In addition, no evidence of onsite releases of hazardous materials into the soil was identified during preparation of the Environmental Site Assessment report for the Project (on file with the Los Angeles Department of City Planning).

There is no evidence to suggest that further study is warranted or needed for methane gas and hydrocarbon contamination. Therefore, the risks associated with methane gas and hydrocarbon

contamination on the Project site are not anticipated, and these factors do not represent a potentially significant impact.

***Asbestos***

When broken apart such as during demolition/ construction activities, microscopic asbestos particles may become airborne and pose a threat to human health. Inhalation of asbestos fibers can lead to various health problems, the most serious of which include lung cancer.

A number of existing structures on the Project site that have been identified as containing ACM's would be demolished as part of the Proposed Project. All structures that are slated for demolition and have not been surveyed should be surveyed for asbestos prior to their demolition. Asbestos abatement measures will be required to ensure the health and safety of construction workers and those in the surrounding community. In compliance with SCAQMD Rule 1403, these materials must be removed by a licensed and registered asbestos abatement contractor prior to demolition. All laws applicable to asbestos abatement will be followed during the demolition of the existing buildings. These laws address safe handling and disposal such that construction workers and those in the surrounding community are not adversely affected. Adherence to procedures outlined in the laws (see mitigation measures section, below) will assure that there will be no significant impact from asbestos due to the demolition.

***Groundwater***

As noted in Existing Conditions above, no contamination of groundwater was found in recent tests. However, any groundwater encountered during site preparation and grading activities must be discharged in accordance with NPDES requirements to assure that pollutants will not be introduced into the storm drain system. Adherence to these requirements would assure a less than significant impact. (See also Section K.2., Stormwater regarding NPDES.)

***Lead -Based Paint***

All structures that are slated for demolition and have not been surveyed should be surveyed for lead-based paint prior to their demolition. For the purpose of this analysis, it is assumed that all these buildings contain lead-based paint. Lead-based paint abatement measures will be required in the demolition of all structures, except for specific buildings or elements of buildings where specific lead-based paint tests confirm that no lead is found there, and the City reviews and accepts these reports. Federal Regulations state that the lead-based paint be properly managed and/ or removed by a licensed abatement contractor during demolition work. All laws applicable to lead-based paint abatement will be followed during the demolition of the existing buildings. These laws address safe handling and disposal such that construction workers and those in the surrounding community are not adversely affected. Adherence to procedures outlined in the laws (see mitigation measures section, below) will assure that there will be no significant impact from lead-based paint due to the demolition.

**Mitigation Measures**

No impact to the Project would occur with regard to Methane Gas and Oil Contamination; thus, no mitigation is warranted. Adherence to existing regulations for the handling and disposal of asbestos and lead-based paint and for the discharge of any groundwater from the site will be required as part of the Project. Adherence to existing laws is required as a matter of course; however, these requirements are listed below for clarification of the requirements.

1. A licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures to be demolished on the Project site, consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (OSHA), 29 CFR 1910.1001, 1926.1101, and 1915.1001. The Project Applicant shall be required to comply with all applicable State and Federal ACM Abatement policies and procedures for removal of ACM's present on the site.
2. Discharge of any groundwater from the site must comply with NPDES discharge requirements.
3. A licensed Lead-Based Paint Inspector shall be retained to determine the presence of lead-based paint and lead-based paint containing materials (LBPCM) within structures to be demolished on the Project site, consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (OSHA), 29 CFR 1910.1001, 1926.1101, and 1915.1001. The Project Applicant shall be required to comply with all applicable State and Federal LBPCM policies and procedures for removal of LBPCM's present on the site.
4. Should the Department of Building and Safety require it, the Applicant will perform the Soil and Gas Survey to the satisfaction of the Department of Building and Safety (including mitigation to the satisfaction of that department, if required) to assure no project related hazards.

**Significant Project Impact After Mitigation**

Project impacts are less than significant.

**Cumulative Impacts**

The related projects must individually be evaluated for asbestos and lead-based containing materials. Mitigation measures will be required on an individual project basis, where appropriate. Since impacts are local to the individual sites, with proper disposal as required by law and mitigation measures, there would be no cumulatively significant impact with regard to asbestos and lead-based paint. Project methane and oil gas impacts will be less than significant, and thus the will not contribute to any potentially cumulative impacts.