V. ENVIRONMENTAL IMPACT ANALYSIS F. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section summarizes the results of a Phase I Environmental Site Assessment (ESA), a Limited Phase II Soil Sampling and a Methane Gas Investigation prepared for the project site. A Phase I ESA is a report that provides a detailed description of the history of uses at a given site, the building materials used at the site, and the potential existence of hazardous materials at a site and in the vicinity of a site. The Phase I ESA included an assessment of the project site, an interview with the president of the company that currently owns the property, and a review of historical records and databases to evaluate the potential for hazardous substances or contamination at the site. The subsequent Limited Phase II Soil Sampling was recommended by the Phase I ESA to evaluate the presence of detectable concentrations of petroleum hydrocarbons, metals, and volatile organic compounds in onsite soils. The Methane Gas Investigation evaluates the presence of methane gas at the project site and makes recommendations for development. The complete Phase I and Phase II ESAs and the Methane Gas Investigation are herewith incorporated by reference. Copies of these reports are included in Appendix F of this EIR:

- Phase I Environmental Site Assessment prepared by CSC Health and Safety, Engineering, Environmental, 21732 Devonshire Street, Suite B, Chatsworth CA 91311, April 26, 2005 (Appendix F-1)
- Limited Phase II Soil Sampling, prepared by LFR Levine Fricke, 3150 Bristol Street, Suite 250, Costa Mesa CA 92626, August 23, 2005 (Appendix F-2)
- Preliminary Subsurface Methane Gas Investigation for 4363 S. Lincoln Blvd., Los Angeles, CA., prepared by GeoKinetics, 77 Bunsen, Irvine, CA, August 22, 2006 (Appendix F-3)

ENVIRONMENTAL SETTING

Existing Project Site Development

The 1.09-acre site is located at the junction of Highway 90 (Marina Freeway) with Highway 1 (Lincoln Boulevard). The site consists of a Budget Rent-A-Car facility, also known as "Beverly Hills Car Collection/Budget Rent-A-Car" located at 4363 Lincoln Boulevard. The vehicle rental business is developed with one fixed building; the main business building, and a paved exterior area with the following features: a maintenance and service station, a vehicle cleaning station (consisting of an exterior carwash and vacuum area), a waste oil storage area, and two main vehicle parking lots. The project site

consists of two legal parcels: APN 4229-018-026 and APN 4224-007-005, both were studied in the Phase I and II reports.

The Phase I ESA reviewed readily available records regarding past and current site use, contacted applicable agencies regarding environmental concerns at the site, and reviewed the agency database list search for environmental concerns at surrounding properties. The information obtained during the records review is provided Appendix F-1 and includes the following:

Summary of Prior Environmental Site Assessments and Environmental Checklists

Two previous environmental site assessments that apparently deal with a large area of which the project site is only a part were reviewed as part of the Phase I ESA (see Appendix F-1). Leroy Crandall and Associates performed these assessments in June 1987. No maps were provided with the reports and the reports do not cite addresses for the various properties involved. Thus, it is difficult to relate the information in them to the project site. The following information, however, is pertinent with respect to the region containing the subject property:

- Significant industrial usage was present in the area during and after World War II. This includes both manufacturing plants and, possibly, a former service station.
- An Avis Rent-A-Car facility was present in the area. A total of 11 underground storage tanks were associated with this property.
- Septic tanks, sumps, and leach fields were formerly present in the area.
- Soil testing detected a range of hydrocarbons, solvents, and PCBs. In some cases, the concentrations detected exceeded state action levels.
- Ground water testing detected a range of hydrocarbons and solvents. In some cases, the concentrations detected exceeded state action levels.
- It is unlikely that the assessments described in the two reports adequately defined the nature, degree, and geographic extend of contamination in the area in general and to the subject property in particular.
- The two assessment reports do not provide information on remediation projects within the area.

Aerial Photographs

Aerial photographic images were obtained from Environmental Data Resources, Inc. (EDR) of Southport, Connecticut, with coverage of the property from 1928, 1938, 1947, 1956, 1965, 1976, 1989, 1994, and 2002. A summary of the observations from these photographs is provided in Appendix F-1.

Historical Topographic Maps

Historical topographic maps were obtained from Environmental Data Resources, Inc. (EDR) of Southport, Connecticut, with coverage of the subject property from 1916, 1934, 1948, 1950, 1964, 1964-1972, and 1964-1981. A summary of the observations from these maps is provided in Appendix F-1.

City Directory Abstract

The site is listed under the following names for the years indicated:

- In 1950, the site is listed as "Thomas Electric Company."
- In 1962, the site is listed as "Standard Helicopter IITC" and "Jovair Inc. Engineers."
- In 1965, the site is listed as "Boat and Motor Sales Inc" and "Cambell Al Vending Company."
- In 1970, the site is listed as "Marina Parts Exch" and "Signal Radio."
- In 1975, the site is listed as "Boat List Howard Lee Yacht Sales", "Howard Lee Yacht Sales," "Hutchinson Yacht Sales," and "Me Millan Marine Inc."
- In 1980, the site is listed as "Reiter Rent-A-Car" and "Reiter Advertising Agency."
- In 1985, the site is listed as "Jartran," "Jartran Inc," "Reiter Advertising Agency," "Reiter Rent-A-Car," and "MPG Car Rental."
- In 2000, the site is listed as "Budget Car and Truck Rental," "MDR Enterprises," "X Bali Way," and "Zionts Sondra."

Collectively, these listings suggest that the subject property has been used for industrial and commercial purposes for more than 50 years.

Environmental Records Review and Interviews

Mapped Database Records Search

The Phase I ESA reviewed the publicly available federal, state, and local databases of known or potential hazardous waste sites or landfills and sites currently under investigation for environmental violations for the site address and the surrounding area. The following is a summary of the results of that search:

Project Site

The project site is listed on the HAZNET database. This database is maintained by the California Environmental Protection Agency and consists of data on facilities and hazardous waste manifests. The database indicates that the project site has generated waste oil and mixed oil, and that the waste material

was sent to a recycler. The site is not listed on any of the other databases searched by the Phase I ESA. In the absence of information indicating a spill or release from the site, the fact that the facility has generated hazardous waste is not necessarily indicative that the environmental status of the site has been affected by this activity.

Offsite

The project site and surrounding properties were identified on federal regulatory databases as follows.

• EPA's National Priority List (NPL)

The EPA's National Priority List (NPL) of uncontrolled or abandoned hazardous waste sites was reviewed for sites within one mile of the subject property. To appear on the NPL, sites must have met or surpassed a predetermined hazard ranking system score, been chosen as a state's top priority site, pose a significant health or environmental threat, or be a site at which the EPA has determined that remedial action is more cost-effective than removal action. NPL, also known as Superfund, is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund program. The source of this database is the U.S. EPA. A review of the NPL and the Proposed NPL, as provided by EDR has revealed that there are no NPL or Proposed NPL sites within approximately one mile of the subject property.

• Federal CERCLIS Sites

The EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database was reviewed to determine if sites within one mile of the subject property are listed for investigation. The CERCLIS database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment.

The EPA's Comprehensive Environmental Response, Compensation, and Liability Information System No Further Remedial Action Planned (CERC-NFRAP) database was reviewed to determine if sites within one mile of the subject property are listed for investigation. The CERC-NFRAP database identifies hazardous waste sites with no further remedial action planned.

A review of the CERCLIS list has revealed that there is one CERCLIS site within approximately 0.5 miles of the subject property. Information regarding this listing is provided in Appendix F-1. A review of the CERC-NFRAP list, as provided by EDR has revealed that there are no CERC-NFRAP sites within approximately 0.5 miles of the subject property.

• U.S. EPA RCRA Generators or Notifiers List

The current Resource Conservation and Recovery Act (RCRA) Facilities Database was reviewed to determine if any RCRA treatment, storage, or disposal sites (TSDs) are located within a 0.5-mile radius of

the subject property. The database search did not identify any RCRA TSD facilities within the search radius of the subject property.

The current Resource Conservation and Recovery Act (RCRA) Facilities Database was reviewed to determine if any RCRA Large Quantity Generators (RCRIS-LQG) or Small Quantity Generators (RCRIS-SQG) are located within a 0.25-mile radius of the subject property. The database search did not identify any RCRIS-LQG facilities, but did identify five RCRIS-SQG facilities within the search radius of the subject property. The listings for these facilities are described in Appendix F-1.

• RCRA Corrective Action Sites List (CORRACTS)

The RCRA Corrective Action Sites List (CORRACTS) is maintained for sites which are undergoing corrective action." A corrective action order is issued when there has been a release of hazardous waste constituents into the environment from a RCRA facility. The database search did not identify any CORRACTS facilities within the search radius of the subject property.

• Emergency Response Notification System (ERNS)

The EPA maintains the Emergency Response Notification System (ERNS), which is a list of reported CERCLA hazardous substance releases or spills in quantities greater than the reportable quantity, as maintained at the National Response Center. The subject property is not listed as an ERNS site.

• AWP

California DTSC's Annual Workplan, formally known as the Bond Expenditure Plan (BEP), identifies known hazardous substance sites targeted for cleanup. The source is the California Environmental Protection Agency. A review of the AWP list indicates that there is one AWP site within a 1-mile radius of the subject property. This listing is described in Appendix F-1.

• Cal-Sites

The Cal-sites database contains potential or confirmed hazardous substance release properties. A review of the Cal-Sites list indicates that there is one such property within a 1-mile radius of the subject property. This listing is described in Appendix F-1.

• Hazardous Substance Release Sites (CHMIRS)

The California Hazardous Material Incident Report System contains information on reported hazardous materials incidents, i.e., accidental releases or spills. The source is the California Office of Emergency Services. A review of the CHMIRS list, as provided by EDR has revealed that the subject property is not listed in the CHMIRS database.

• CORTESE

This database identifies public drinking water wells with detectable levels of contamination, hazardous substances sites selected for remedial action, sites with known toxic materials identified through the abandoned site assessment program, sites with USTs having a reportable release and all solid waste disposal facilities from which there is known migration. The source is the California Environmental Protection Agency/Office of Emergency Information. A review of the Cortese list indicates that there are 12 Cortese sites within a one-mile radius of the subject property. These listings are described in Appendix F-1.

• Notify 65

Notify 65 records contain facility notifications about any releases that could impact drinking water and thereby expose the public to a potential health risk. The data comes form the State Water Resource Control Board's Proposition 65 database. A review of the Notify 65 list indicates that there are no such sites within a one-mile radius of the subject property.

• Toxic Pits

The Toxic Pits database consists of sites suspected of containing hazardous substances, at which cleanup has not yet been completed. The information is derived from the State Water Resource Control Board. A review of the Toxic Pits database indicates that there are no such sites within a one-mile radius of the subject property.

• Solid Waste Disposal Facilities/Landfill Sites/Waste Management Unit Database

The Integrated Waste Management Board (IWMB) maintains an inventory of permitted solid waste facilities (SWFs) located in the state. Two SWF sites were identified within a 0.5-mile radius of the subject property. These listings are described in Appendix F-1.

• Waste Management Unit Database System (WMUDS)

The Waste Management Unit Database System (WMUDS) is used by the State Water Resource Control board staff and the Regional Water Control Boards for program tracking and inventory of waste management units. WMUDS is composed of the following databases: Facility information, scheduled inspections information, waste management unit information, SWAT program information, SWAT report summary information, SWAT report summary data, Chapter 15 information, Chapter 15 monitoring parameters, TPCA program information, RCRA program information, closure information, and interested parties information. No WMUDS were identified within a 0.5-mile radius of the subject property.

• SWRCB Leaking Underground Storage Tank (LUST) List

The California State Water Resources Control Board (SWRCB) maintains a list of leaking USTs within the State of California. A review of the LUST database indicates that there are 11 such sites within a 0.5-mile radius of the subject property. These listings are described in Appendix F-1.

• Underground Storage Tank (UST) List

The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data comes from the State Water Resource Control Board's Hazardous Substance Storage Container Database. A review of the UST list indicates that there is one such site within a 0.25-mile radius of the subject property. A description of this listing is provided in Appendix F-1.

• CA FID

The Facility Inventory Database contains active and inactive underground storage tank locations. The source is the State Water Resource Control Board. A review of the CA FID UST list, as provided by EDR has revealed that there are seven such sites within a 0.25-mile radius of the subject property. These listings are described in Appendix F-1.

• HIST UST

A review of the historical UST list indicates that there are four such sites within a 0.25-mile radius of the subject property. These listings are described in Appendix F-1.

• HAZNET Hazardous Waste Manifest

The data is extracted from the copies of hazardous waste manifests received each year by the DTSC. The annual volume of manifests is typically 700,000–1,000,000 annually, representing approximately 350,000–500,000 shipments. Data from non-California manifests and continuation sheets are not included in the present time. Data are from the manifest submitted without correction and therefore many contain some invalid values for data elements such as generator ID, TSD ID, waste category, and disposal method. The source is the department of Toxic Substance Control Agency. A review of the HAZNET database indicates that the subject property is listed on the HAZNET database.

• Unmapped Sites

The Phase I ESA Radius Report lists 21 sites as unmapped sites (also known as an "orphan site"). Orphan sites are sites for which insufficient information exists to adequately determine their location.

Therefore, in the absence of additional information, it is difficult to assess the potential for such sites to affect the project site.

Of the 21 orphan sites, 18 are listed under the ERNS (Emergency Response Notification System) database. An ERNS site typically represents a potential threat to the environmental status of the subject property only if it is located on the subject property. The locations of 15 of the ERNS sites can be reasonably ascertained as not being on the subject property. The locations of the remaining three ERNS sites are indicated only as "Marina del Rey". Thus, it is possible that one or more of these sites is located on the subject property.

The Village Marina Cleaners is listed under both HAZNET and the CLEANERS database. It is not listed on databases that indicate a spill or release. Therefore, it is unlikely that this site represents a potential threat to the environmental status of the subject property.

Del Rey Auto is listed under HAZNET. It is not listed on databases that indicate a spill or release. Therefore, it is unlikely that this site represents a potential threat to the environmental status of the subject property.

Villa Marina Shopping Center is listed under the CA SLIC (Spills, Leaks, Investigations, and Cleanup) database. This shopping center is located potentially up-gradient of the subject property. Therefore, this case represents a potential threat to the environmental status of the subject property.

Site Reconnaissance and Investigation

A site reconnaissance was conducted on 19 and 21 March 2005. The reconnaissance consisted of the observation and documentation of existing site conditions and nature of the neighboring property development within 0.25 miles of the site. Site photographs are contained in Appendix F-1. The project site consists of a Budget Rent-A-Car facility that covers approximately 1.09 acres. It has one fixed building and a paved exterior area with the following features: a service area, a waste oil storage area, a carwash, an area for vacuuming and areas for storing vehicles. A concrete swale extends across the site. It discharges southeast to a grated stormwater drain adjacent to Lincoln Boulevard. Stormwater on the site flows first to this swale and then to the stormwater drain. Based on ducting visible above the dropped ceiling, there is an HVAC system on the property. No information was obtained with respect to it. According to the property owner, one or more ground water monitoring wells are present on the subject property. These relate to previous environmental assessments. The wells were not found during the site investigation. Reportedly, no other wells are on the property.

Two wastewater streams are generated on the property: (1) a domestic wastewater, which apparently discharges to the municipal sewer system; and (2) effluent from the carwash, which discharges to a floor drain that leads to a three-stage clarifier. The discharge from the clarifier is pumped into a 500-gallon

holding tank. From there, it is recycled back into the carwash. Solids from the clarifier are reportedly cleaned out on a regular basis.

There is a possible third wastewater stream. It is present near the southeast corner of the property. It appears that some hand-cleaning of trucks is done in this area. The presence of buckets suggests that at least some water or fluid is involved in the hand-cleaning.

Three in-ground lifts are present in the service area. It is possible that the respective hydraulic oil reservoirs are still present in the ground.

Environmental Hazards

The following potential environmental hazards were investigated during the site walk. Also, see Figure V.F-1, Phase I ESA Site Map

- Hazardous/Regulated Substances/Wastes and Petroleum Products Used or Stored at Site
 - Approximately five gallons of liquid, possibly gasoline, are stored in safety containers in the service area.
 - 500 gallons of motor oil is stored in an aboveground storage tank in the service area. A 55-gallon drum of motor oil with a dispenser is present in the same area.
 - Used oil is stored in a 250-gallon aboveground storage tank and an adjacent plastic drum with a capacity on the order of 50 gallons.
 - Used oil filters are stored in a 55-gallon drum adjacent to the used-oil storage.
 - Automatic transmission fluid is stored in a 55-gallon drum adjacent to the used-oil storage.
 - A range of paints, automobile-service related chemicals (e.g., antifreeze), tires, batteries, and oily wastes are stored in a number of areas around the service area.
 - One partially full drum of Armor-All and one empty drum of Armor-All are present near the carwash.
 - According to a site representative, the site stopped servicing vehicles on 1 March 2005. It is possible that the site may resume performing service in the future. In the meantime, the chemicals and wastes present in and around the service area are simply being stored at the site. The carwash and vacuum areas are still being used. Chemicals in those areas are reportedly still in use. The site representative also indicated that solvents used at the site in recent years have been non-chlorinated.

Figure V.F-1 Phase I ESA Site Map

Evidence of Releases

• The asphalt in the area of the used-oil storage is stained and degraded. The staining extends to the concrete swale. Additionally, a stain extends from the area of the carwash to the concrete swale.

One pole-mounted transformer is present on a utility pole mounted on the sidewalk on the east side of the property. Additionally, a group of pad-mounted transformers is present adjacent to the subject property to the west. These transformers appear to be in good condition.

- An HVAC system is apparently present on site. Thus, it is possible that chlorofluorocarbons are in use at this site.
- The on-site building was reportedly constructed in 1994. This is after the dates on which asbestoscontaining materials and lead-based paints were phased out. Thus, it is unlikely that either of these materials is present on the subject property.
- No landfills were noted on or adjacent to the subject property.
- With the exception of the 3-stage clarifier, no pits, ponds, lagoons, sumps, drywells or catch basins were noted on or adjacent to the subject property.

On-site Aboveground and Underground Storage Tanks

Reportedly, there are no undergrounds storage tanks on the subject property. No evidence suggesting the presence of underground storage tanks was noted during the site investigation.

Three large aboveground storage tanks are present on the property.

- A 500-gallon motor oil tank is present in the service area.
- A 250-gallon used-tank is present in the service area.
- A 500-gallon holding tank is present in the carwash area. It contains fluids being recycled through the system.

Additionally, there is a set of five plastic drums, each with a capacity on the order of 50 gallons, present in the carwash area. These drums contain various cleaners and liquids used in the carwash process.

Interviews

Mr. Jerry Siemons, President of Yucca Springs, LLC, was interviewed regarding the history of the subject property. He indicated the following:

- Yucca Springs has owned the property for about 1.5 years. Mr. Siemons had owned the property personally since about 1994 before transferring ownership to Yucca Springs, LLC.
- The area containing the subject property was used by industry during and after World War II. There is reported soil and ground water contamination from that era.
- The subject property was being used by a car-rental facility prior to Mr. Siemons acquiring it. Mr. Siemons then redeveloped the property.
- Mr. Siemons did not know of any chemical spills or releases on the property during the years in which he has been associated with the property.

Phase I ESA Findings and Conclusions

The following on-site environmental concerns were identified.

- Even though the facility no longer performs vehicle servicing and maintenance, chemicals and associated wastes used in such work are still present in the service area.
- Three in-ground lifts are present. It is possible that their respective hydraulic-oil tanks are still present in the ground.
- Based on surface staining, it appears that fluids released from the carwash and used-oil storage areas have discharged to the concrete swale and from there to the stormwater drain on the east side of the subject property.
- Based on a review of the 1987 environmental assessments, it is possible that the subject property may have been the site of historical contamination.
- No information has been found regarding spills or releases, if any, following the 1987 assessments, but prior to Mr. Siemons acquiring the property.
- Asphalt around the used-oil storage tank is stained and degraded, suggesting that a chemical release may have occurred.

Off-Site Environmental Concerns

The following off-site environmental concerns are noted:

- The locations of three orphan sites listed under the ERNS database cannot be ascertained. It is possible that one or more of these sites may be located on the subject property.
- The Villa Marina Shopping Center is listed under the CA SLIC database. This shopping center is located potentially up-gradient of the subject property. Therefore, it represents a potential threat to the environmental status of the subject property.

• Previous environmental assessments indicate that the area including the subject property has an industrial history extending back 50 years or more and that contamination of soil and ground water in excess of action levels has detected. The documentation provided, however, is insufficient to determine whether the nature, degree and extent of the contamination has been adequately assessed, whether and how it has been remediated, and whether the competent regulatory agency or agencies have issued "No Further Action" letters.

Limited Phase II Soil Sampling

Following the Phase I ESA's recommendations for additional research to determine whether the project site was affected by the soil and groundwater contamination noted in the 1987 environmental assessments, a Limited Phase II Soil Sampling Study was conducted on the project site (see Appendix F-2). The soil sampling study was conducted by LFR Levine Fricke (LFR), who advanced seven of eight proposed soil borings (SB-1 through SB-8) at the project site on August 2, 2005. SB-1 and SB-2 were located adjacent to a drain in the vehicle cleaning area, SB-3 was located on the effluent end of the clarifier west of the car wash area, SB-4 and SB-5 were located near a storm drain at the lowest elevation on the Site property, SB-6 and SB-7 were located near a storage tote at the waste oil storage area, and SB-8, which encountered drill refusal, was located near the hydraulic lifts in the vehicle storage area (see Figure V.F-2, Phase II ESA Site Plan with Sampling Locations).

A total of 14 soil samples (2 per boring) were collected at the project site to evaluate the presence or absence of detectable concentrations of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and metals that may be associated with the historic and current activities at the Site location and general Site vicinity. Laboratory analytical results indicated that TPH and VOCs were not detected in any of the soil samples. Barium, chromium, cobalt, copper, nickel, vanadium, and zinc were detected in SB-4; however, all concentrations were well below the EPA's Preliminary Remediation Goals (PRGs) for those respective metals, and fall within typical background concentration levels. The location of SB-4 at the southern and eastern boundary of the Site is near a storm drain. This location is at the lowest elevation on the property and likely experiences a substantial amount of surficial runoff during rain events. The daily activities of the business onsite include the washing and cleaning of the vehicles in the parking lot. Based on the results of the seven shallow soil samples, the deeper soil samples collected were not analyzed.

Based on the laboratory results of the shallow soil samples collected during drilling activities, no further action or investigation is deemed necessary with regards to the Site.

Methane Gas Survey

The project site is located within the Playa Del Rey Oil Field as it has been mapped by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR). As such, the

Figure V.F-2 Phase II ESA Site Plan with Sampling Locations

property is also located within a "Methane Zone" as designated by Los Angeles Department of building and Safety (LADBS). A methane gas investigation was performed for the purpose of documenting the concentration and pressure of methane gas in the subsurface of the project site (see Appendix F-3).

The presence of methane gas in the subsurface is common within former oil production areas and other locations where organic material - such as grass, leaves, wood, manure, etc. - are present in the soil. Biogenic methane is generated by the bacteriological digestion, or biodegradation, of organic matter in the absence of oxygen. Methane of thermogenic or petrogenic origin may also be present in surficial soils as a result of its upward migration from deeper oil and gas bearing zones. Methane gas is common and can be found in the soil at a relatively high percentage of building sites in southern California. Methane is not toxic, however it is combustible and potentially explosive at concentrations above 53,000 ppm in the presence of oxygen. This concentration is referred to as its Lower Explosive Level or LEL. Methane is lighter than air and therefore has a natural tendency to rise to the ground surface where it typically dissipates into the atmosphere. The presence of non-pressurized methane at shallow depths beneath the ground surface is normally not problematic. The rates at which the methane is generated and/or migrates towards the ground surface are slow enough such that the gas dissipates naturally under normal circumstances. However, as methane migrates to the ground surface, the potential exists for its accumulation beneath slab-on-grade foundation systems or other relatively impermeable ground coverings. If the gas accumulates to high concentrations, and becomes pressurized, and a crack or other penetration is present in the floor slab of the structure, detectable levels of methane may enter the interior of the building. Improvements - such as sub-slab vent lines or gas membranes - are typically installed as a precautionary measure within Methane Zones, and in other areas if elevated subsurface gas levels are detected.

The field work associated with the methane gas investigation at the project site included the installation and monitoring of two (2) multi-stage subsurface gas probes. The locations of these gas probes are shown in Figure V.F-3. The subsurface gas probes were installed on August 7, 2006 and they were subsequently monitored on August 9 and 10, 2006. The gas probes were installed using a truck-mounted direct push drilling rig. See Appendix F-3 for a discussion of the probes and the procedures for their employment and monitoring. An attempt was made to individual sampling tips at depths of 5, 10, and 20 feet below the finished ground surface (bgs) at both locations. However, the presence of shallow groundwater and/or drilling refusal prevented the installation of sampling tips below a depth of 12 feet at one location and ten feet at the other.

Results of Methane Gas Investigation

The pressures and concentrations measured in each of the subsurface gas probes during the two monitoring events are summarized in Table V.F-1. As indicated, methane gas was not detected at either of the gas probe installations. The pressures measured in the gas probes ranged from 0.00 to +0.05 inches of water. This pressure range is relatively small (i.e. <0.002 psi) and consistent with normal barometric variations and associated lag.

Figure V.F-3 Location of Methane Gas Probes

Table V.F-1Multi-Stage Gas Probe Monitoring Results

The concentration of oxygen in the atmosphere at sea level is approximately 21%. The oxygen levels were found to be moderately to significantly depressed below typical atmospheric levels at each gas probe installation. The lowest subsurface oxygen level recorded at the site was 1.7% at a depth of 5 feet in gas probe P-1. The average oxygen concentration measured in the gas probes was approximately 5%.

The average concentration of carbon dioxide in the atmosphere at sea level is approximately 0.03%. Subsurface carbon dioxide levels were elevated above typical atmospheric levels in each of the gas probes. The highest carbon dioxide concentration measured at the site was 16.4% at a depth of 5 feet in gas probe P-1. The average carbon dioxide concentration measured in the gas probes was approximately 10%.

The elevated carbon dioxide levels and depressed oxygen levels indicate organic material entrained within the soil at the site is being biodegraded under aerobic conditions. Based upon the absence of methane gas and the corresponding low soil gas pressures, the methane gas investigation concludes the property should be classified as a Level I site with a Design Methane Pressure of ≤ 2 " of water in accordance with LADBS guidelines.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the CEQA Guidelines, the proposed project would have a significant impact if it should cause one or more of the following to occur:

- 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 project site is located approximately 2.05 miles south of the Santa Monica Municipal Airport and approximately 2.1 miles north Los Angeles International Airport. There are no private airports in the vicinity. Therefore, the proposed project would have no impact with respect to Thresholds (e) and (f) listed above. In addition, there are no wildlands in the project vicinity; therefore, the proposed project would have no impact vicinity; therefore, the proposed project would have no impact vicinity; therefore, the proposed project would have no impact vicinity; therefore, the proposed project would have no impact with respect to Threshold (h). Therefore, no further analyses of these topics are required.

Based upon criteria established in the City of Los Angeles <u>Draft L.A. CEQA Thresholds Guide</u>, the Project would result in a significant impact to hazards or hazardous materials if:

• The Project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation).

Project Impacts

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

The proposed project is a mixed use residential and retail development. As such, the project would be expected to use and/or store typical household cleaning products but no hazardous materials such as are more commonly associated with manufacturing processes would be expected. Therefore, the proposed project would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Would the 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?

Demolition and Construction

• Soils

As discussed above, the Limited Phase II Soil Sampling study prepared by LFR Levine Fricke (August 23, 2005; Appendix F-2) revealed that there are currently no detectable concentrations of TPH and VOCs on the project site. The metals detected during the analytical tests of SB-4 fall within typical background concentration levels, and are well below the EPA's Preliminary Remediation Goals for those respective metals, and therefore, do not present a concern to the project site. The Limited Phase II Soil Sampling study concluded that based on the laboratory results of the soil samples, no further action or investigation is deemed necessary with regards to the project site. Therefore, the potential impact associated with the accidental release of hazardous substances resulting from soil disturbance during demolition or construction activities on the project site is considered to be less than significant.

• Polychlorinated Biphenyls (PCBs) and Freon

Based on the age of the structures, the potential exists for the pad-mounted and pole-mounted transformers to contain PCBs. Exposure of workers and underlying soils to PCBs during the demolition of the project site structures would be a potentially significant impact. A qualified PCB abatement contractor would be required to comply with applicable state and federal rules and regulations governing PCB removal and disposal. Provided that Mitigation Measure F-4 is incorporated and removal and disposal rules and regulations are followed, hazardous materials impacts caused by exposure to PCBs would be less than significant.

• Asbestos-Containing Materials (ACMs) and Lead Based Paint (LBP)

The only building on-site, the main business building, was reportedly constructed in 1994. This is after the dates on which asbestos-containing materials and lead-based paints were phased out. Thus, it is unlikely that either of these materials is present on the subject property. Therefore, demolition of this building as part of project implementation would not be anticipated to cause an accidental release of ACMs and impacts would be less than significant.

Operations

As discussed above, the proposed project is a mixed use residential and retail development. As such, the project would not be expected to involve the use of hazardous materials that could be released into the environment in the event of upset and/accident conditions. Therefore, the impact associated with the project's potential release of hazardous materials into the environment in the event of upset and/accident conditions would be less than significant.

Methane Gas

The project site is located within the Playa Del Rey Oil Field as it has been mapped by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR). As such, the

property is also located within a "Methane Zone" as designated by Los Angeles Department of building and Safety (LADBS). Methane is combustible and potentially explosive at concentrations above 53,000 ppm in the presence of oxygen. As methane migrates to the ground surface, the potential exists for its accumulation beneath slab-on-grade foundation systems or other relatively impermeable ground coverings. If the gas accumulates to high concentrations, and becomes pressurized, and a crack or other penetration is present in the floor slab of the structure, detectable levels of methane may enter the interior of the building. The elevated carbon dioxide levels and depressed oxygen levels at the project site indicate organic material entrained within the soil at the site is being biodegraded under aerobic conditions. Based upon the absence of methane gas and the corresponding low soil gas pressures, the methane gas investigation concludes the property should be classified as a Level I site with a Design Methane Pressure of ≤ 2 " of water in accordance with LADBS guidelines. This designation indicates a potentially significant impact and remedial improvements, such as sub-slab vent lines or gas membranes, are typically installed as a precautionary measure within Methane Zones, and in other areas if elevated subsurface gas levels are detected. With installation of these standard measures methane-related hazards would be less than significant.

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

There are no elementary, middle or high schools within one-quarter mile of the project site. However, Kid's Point Preschool is adjacent to the project site. As discussed above, the proposed project is a mixed use residential and retail development. As such, the project would be not expected to handle, store or dispose of hazardous or acutely hazardous materials, substances, or waste. Therefore, potential impacts to schools associated with the project's exposure to the environment of hazardous emissions, hazardous or acutely hazardous materials, substances or waste would be less than significant.

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?

As discussed above, the proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not be expected to create a significant hazard to the public or the environment.

Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The proposed project is the development of a single mixed-use residential and retail structure on a 1.09-acre site. The project would not block or eliminate any existing circulation routes or streets and would not result in any significant intersection congestion. Therefore, the project would not be expected to impair

implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

CUMULATIVE IMPACTS

Other than typical household cleaning solvents and pool chemicals, the proposed project would not use, store, transport or dispose of hazardous or acutely hazardous materials. Therefore, there is no potential for the proposed project to combine with cumulative growth in the area (see Table III-1 Section III, Environmental Setting) to create a cumulatively significant hazard to the public or the environment through the routine transport, use, storage or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Similarly, because the project would not handle hazardous or acutely hazardous materials, substances, or waste, it would not combine with cumulative growth in the area to create a cumulatively significant risk of handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Because the project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, it would not combine with one or more of the related projects in the area that may be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, to create a cumulatively significant hazard to the public or the environment.

As discussed in Section V.J., Transportation /Traffic, the proposed project would not significantly impact any of the study intersections. Furthermore, no cumulatively significant traffic impacts at any of the study intersections have been identified. Therefore, the proposed project would not combine with cumulative growth in the area to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

MITIGATION MEASURES

No significant impacts related to hazards or hazardous materials have been identified. Therefore, mitigation measures are not required under CEQA. However, the Phase I ESA made several recommendations for the clean-up of the site prior to construction which will be followed:

- **F-1** Chemicals in the service area shall either be disposed of in accordance with regulations or, if it is likely that the facility will shortly resume servicing vehicles, stored in a manner that will prevent spills or releases.
- **F-2** Waste chemicals in the service area shall be removed and disposed of in accordance with regulations.

- **F-3** Prior to the onset of demolition or construction, the in-ground lifts shall be removed by qualified personnel.
- F-4 Prior to and during construction a qualified PCB abatement contractor shall inspect pad- and polemounted transformers within the project disturbance limits for leaks. Leaking transformers should be considered a potential PCB hazard and shall be removed and disposed of in compliance with all applicable state and federal rules and regulations.

The following methane mitigation measures are typically required by Los Angeles Department of Building and Safety for new Level I buildings within the methane zone. Construction of the proposed project in accordance with the Building Code and the requirements imposed by the Department of Building and Safety (including the following) would ensure that methane-related hazards would be less than significant. No further mitigation measures are required.

- F-5 Sub-Slab Vent System: A series of perforated vent lines and an associated 4" thick gravel blanket shall be installed beneath the floor slab of the proposed structure. The perforated vent lines must be connected to solid vent piping that extends through the walls or pipe chases of the building to outlets above the roof line. A dewatering system must be installed if the design high groundwater level for the project is not at least one foot below the lowest vent piping elevation.
- **F-6 Impervious Membrane:** A continuous gas membrane is required below the floor slab of the building. This membrane must be sealed against footings, pilings, and utilities to form a gas-tight barrier beneath the building.
- **F-7** Utility Trench Dams: A section of impervious backfill consisting of compacted native soil or sand / cement slurry must be installed in utility trenches that extend beneath the perimeter of the building in order to prevent methane gas from migrating beneath the structure through sand bedding or backfill.
- **F-8** Conduit Seals: Gas tight seals must be installed on all conduits (e.g. electrical, cable T.V., telephone, etc.) that extend to the interior of the structure. The purpose of these seals is to prevent methane gas from entering subsurface cracks or discontinuities in the conduits and subsequently migrating to the interior of the building.
- **F-9** Methane Detection System: The proposed project shall be provided with an approved Methane Control System which shall include a vent system and gas detection system. The gas detection system, as defined in Section 91.7102 of the Los Angeles Municipal Code shall be installed in the lowest floor level at grade and shall be designed to automatically activate the vent system when an action level equal to 25 percent of the Low Explosive Limit (LEL) mixture concentration is detected in those areas.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts associated with hazards and hazardous materials would be less than significant.