

IV. Environmental Impact Analysis

L. Environmental Hazards

1. Introduction

The following section addresses hazardous materials issues and is based upon the *Phase I Environmental Site Assessment* prepared by Citadel Environmental Services, Inc. for the Proposed Project, dated October 2011. The full text of the report is included as Technical Appendix AA to this Draft EIR.

Hazardous materials include solids, liquids, or gaseous materials which because of their quantity, concentration or physical, chemical or infectious characteristics may: (1) cause or contribute to an increase in mortality or serious illness; or (2) pose a substantial present or potential harm to human health or the environment when improperly handled, used, transported, stored or disposed. This section addresses the following environmental safety issues: Hazardous Materials Use, Storage, and Management; Hazardous Waste; Asbestos, including asbestos containing materials (ACMs) and Lead-Based Paint; Polychlorinated Biphenyls (PCBs); Aboveground Storage Tanks (ASTs); Underground Storage Tanks (USTs); and conditions relative to portions of the Project Site being located within a City-designated Methane Zone. See Section IV.H, Water Resources, for other related environmental safety issues such as surface water and groundwater quality.

The analysis of on-site hazardous materials assumes that the utilization of such materials would continue and potentially increase under the Proposed Project. In addition, existing hazardous materials and hazardous waste programs currently in place on the Project Site are assumed to continue under the Proposed Project.

2. Environmental Setting

a. Regulatory Framework

There are numerous federal, state, and local regulations governing hazardous materials that are relevant to and would be implemented by the Proposed Project. These regulations are provided in Appendix G of this Draft EIR.

b. Prior Uses of the Project Site

To investigate the history of the Project Site, select historic aerial photographs, historic building permits, historic city directories and Sanborn Fire Insurance Rate Maps, were reviewed. The Project Site was then segregated by construction phases into Historic Site Areas (HSAs) based upon mass re-development from the previous individual streets and properties to the current facilities.

The current and past land uses within the Project Site were identified to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (REC), which are defined in Section 1.1.1 of the American Society of Testing and Materials (ASTM) Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water or surface water of the property. In order to differentiate between conditions relating to current and prior uses, conditions relating to prior uses are classified as Historical Recognized Environmental Conditions (HREC).

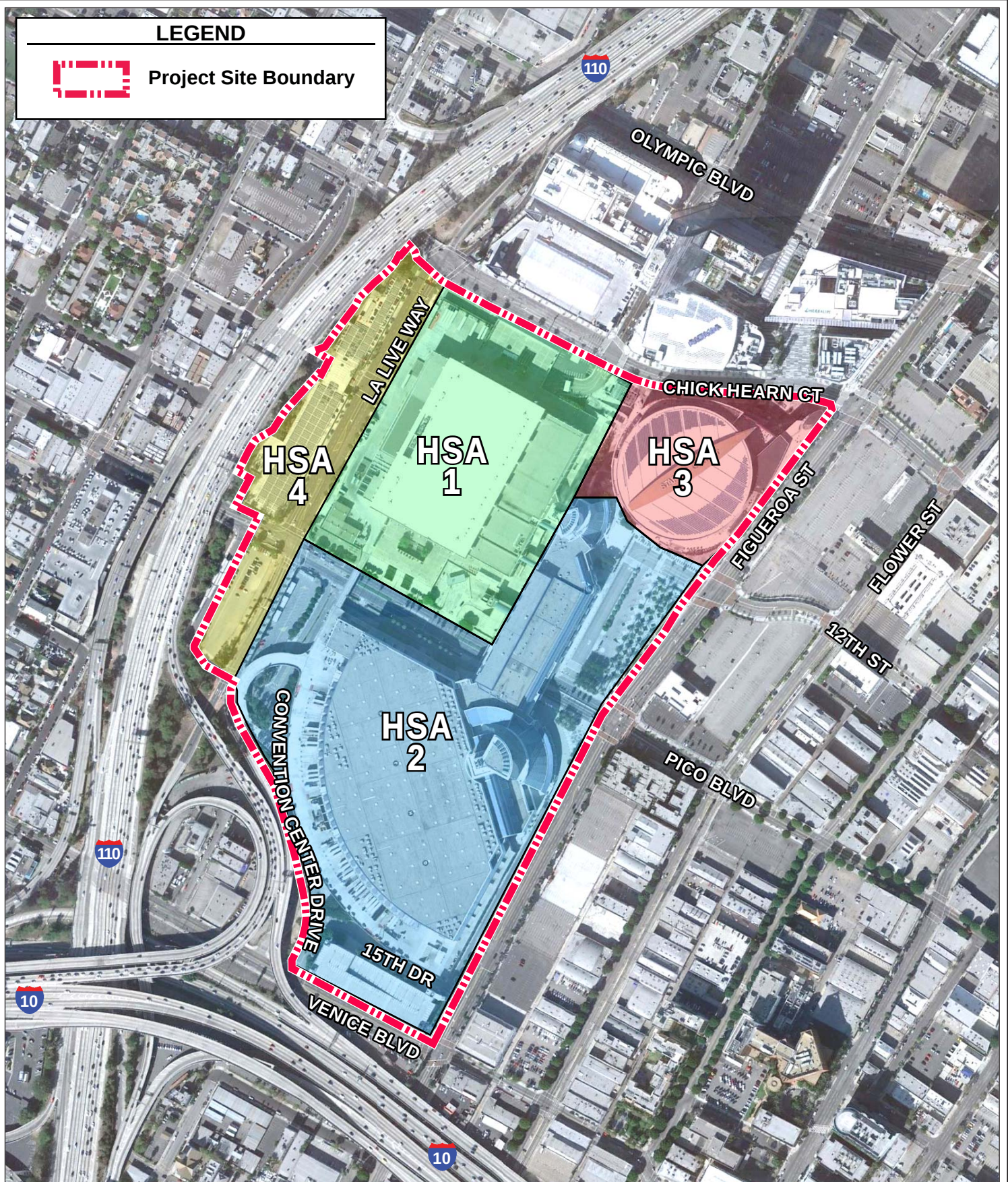
(1) Historic Site Area 1

As shown in Figure IV.L-1 on page IV.L-3, HSA1 covers the entire footprint of the existing West Hall, and extends to Chick Hearn Court (formerly 11th Street) to the north, STAPLES Center and the Concourse Buildings to the east, Pico Boulevard to the south and L.A. Live Way (formerly Cherry Street) to the west. A historic aerial map of the Project Site is also provided in Figure IV.L-2 on page IV.L-4. Based on the review of historical documents, HSA1 was developed with local streets and isolated single-family houses as early as 1890. The development of HSA1 increased to a densely developed commercial, industrial, and residential area by the 1920s, with commercial properties located along 11th Street and Pico Boulevard, and residential, commercial and industrial properties located in the central area of HSA1. A large area in the central portion of HSA1, along 11th Place and 12th Street, was developed with the Los Angeles Railway Company storage yard, control buildings, a transformer house and cleaning pit from at least 1906 until the development of the current West Hall in 1970/1971. Businesses throughout HSA1 included multiple auto sales, repair and service facilities, machining and manufacturing companies, retail sales, dry cleaners, printers, and typesetters. In 1970 and 1971, the entire surface of HSA1 was cleared of all buildings and local streets, and the West Hall was constructed. Some renovations were performed within HSA1 during the Los Angeles Convention Center (Convention Center) expansion in 1993.

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Project Site Boundary



Source: Google Earth Pro 2011.

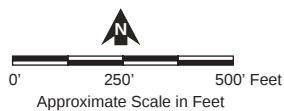
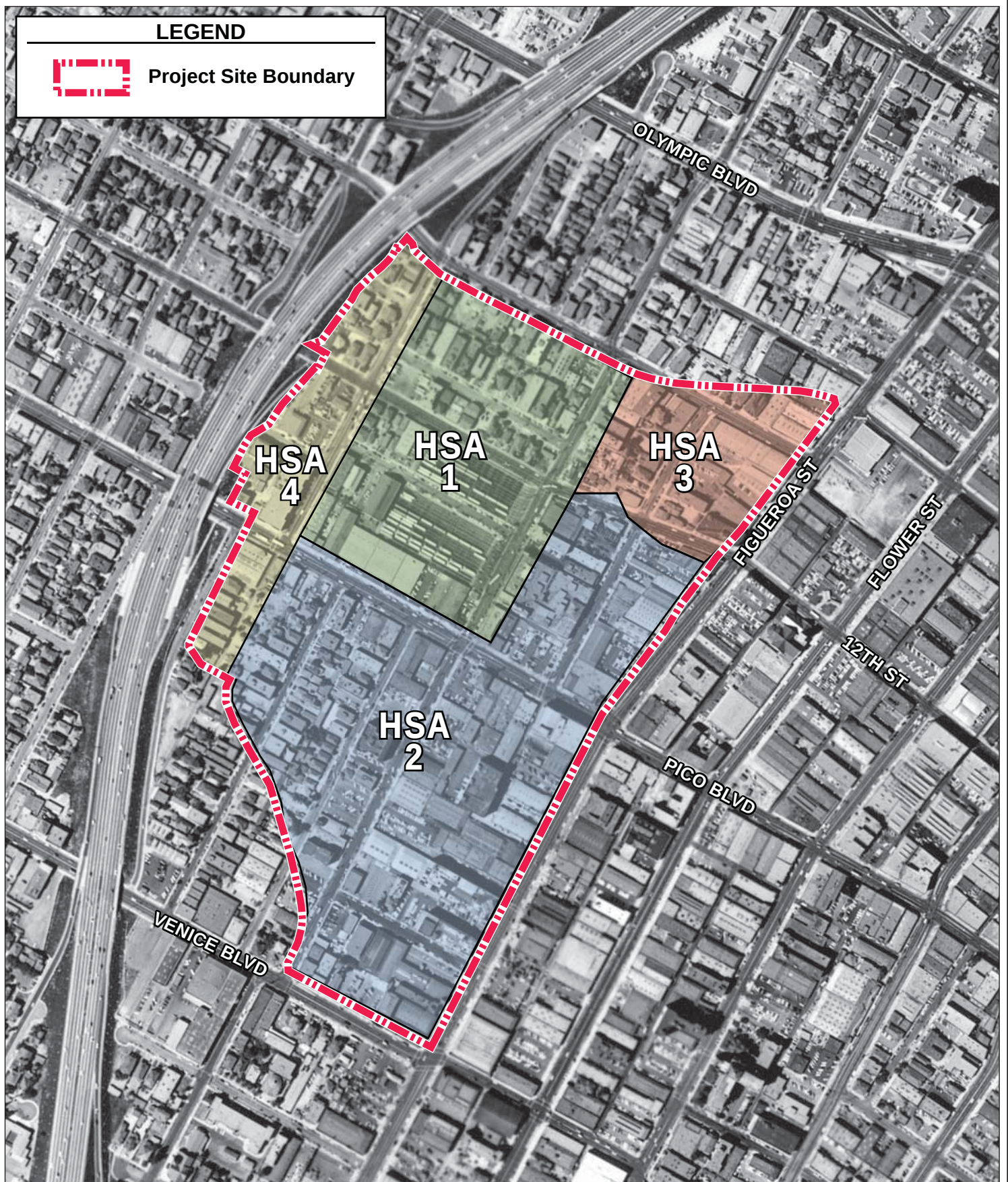


Figure IV.L-1
Boundaries of Historic Site Areas

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Project Site Boundary



Source: Environmental Data Resources Inc., 2011.

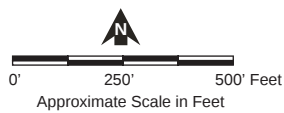


Figure IV.L-2
Historic Aerial Map of Project Site

Prior to the development of the existing West Hall, the Project Site was developed with one (1) oil well. The oil well was developed by Chevron U.S.A., Inc. and is reportedly plugged. The California Department of Oil, Gas and Geothermal Resources (DOGGR) was contacted regarding the exact depth of the plug and the age of the well. However, the DOGGR records are unavailable for review, with the exception of limited information available on the department's online well mapping system. According to information provided on the DOGGR online mapping system, the well is estimated to be located beneath the "Blue" parking zone of the West Hall. The well plug is presumed to be greater than 100 feet below ground surface (bgs), in accordance with industry standards prior to 1971. Based on the prior uses within HSA1, HRECs identified within this area include total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), PCBs, semi-volatile organic compounds (SVOCs), metals, and a plugged oil well.

(2) Historic Site Area 2

As shown in Figure IV.L-1 on page IV.L-3, HSA2 covers the entire footprint of the existing South Hall (which is bound by Pico Boulevard to the north, Figueroa Street to the east, Venice Boulevard to the south and L.A. Live Way to the west), the Concourse Building (which extends to the north over Pico Boulevard), and the current Gilbert Lindsay Plaza area (located east from the Concourse Building to Figueroa Street). Based on the review of historical documents, the HSA2 was developed with local streets and isolated single-family houses as early as 1890. The development of HSA2 increased to densely developed commercial, industrial, and residential properties by the 1920s, with the concentration of commercial properties located along Figueroa Street and Pico Boulevard, and residential, single and multi-family houses located in the southwestern portion of HSA2, along Wright Street and De Long Street. The properties located along Figueroa Street were heavily occupied by automotive related business, including multiple auto sales, repair and service facilities, from the 1920s through the 1950s. Most of the auto related buildings were converted to various other businesses in the 1960s through 1980s, such as a bowling alley, retail stores, warehouses and some restaurants. The properties located along the south side of Pico Boulevard were developed with retail stores, restaurants, a battery manufacturing facility, a printing facility, laundry facilities, and auto sales/service facilities from the 1920s through the 1980s. The northeastern portion of HSA2, located to the north of Pico Boulevard, was completely redeveloped in 1970/1971, as a portion of the original Convention Center development. The entire HSA2 was redeveloped into its current configuration from 1989 through 1993, when the South Hall, the Concourse Building, and the Gilbert Lindsay Plaza were developed. Some renovations were completed in 1997 and 1999, during the development of STAPLES Center to the north of HSA2. Based on the prior uses within HSA2, HRECs identified within this area include TPH, VOCs, SVOCs, and metals.

(3) Historic Site Area 3

As shown in Figure IV.L-1 on page IV.L-3, HSA3 covers the entire footprint of the existing STAPLES Center, which extends south from Chick Hearn Court (11th Street) to Gilbert Lindsay Plaza, and west from Figueroa Street to the West Hall. Based on the review of historical documents, HSA3 was developed with local streets and single-family houses as early as 1890. The development of HSA3 increased to densely developed commercial, industrial, and residential by the 1920s, with the concentration of commercial properties located along Figueroa Street and 11th Street, and residential single and multi-family houses located in the southwestern portion of HSA3, along Trenton Street. The properties located along Figueroa Street were heavily occupied by automotive related business, including multiple auto sales, repair and service facilities, from the 1920s through the 1950s. Most of the auto related buildings were converted to various other businesses in the 1960s, such as furniture sales, retail stores and warehouses. The properties located to the north of 12th Street were occupied as commercial and industrial properties from the 1920s through 1960s, including auto repair, print shop, and machine shop operations. The properties located along the south side of 11th Street were developed with retail stores and restaurants from the 1920s through the 1960s. The entire HSA3 was completely redeveloped in 1970/1971 as a portion of the original Convention Center development, including moving 11th Street from bisecting HSA3 to being adjacent to the north of HSA3. The western portion of HSA3 was converted to a surface parking lot during the development of the Concourse Building and Gilbert Lindsay Plaza in 1993. In 1999, HSA3 was completely redeveloped into its current configuration, as STAPLES Center, and has remained essentially unchanged. Some modifications to STAPLES Center and 11th Street were completed during the development of L.A. LIVE to the north of HSA3 in 2008/2009. Based on the prior uses within HSA3, HRECs identified within this area include TPH, VOCs, SVOCs, and metals.

(4) Historic Site Area 4

As shown in Figure IV.L-1 on page IV.L-3, HSA4 covers the entire footprint of the existing Cherry Street Garage, which is located west of L.A. Live Way and immediately east of the I-110 Freeway, extending south from 11th Street to Pico Boulevard (bridging over 12th Street), as well as the Bond Street Parking Lot located along the south side of Pico Boulevard, west of L.A. Live Way and east of Bond Street. Based on the review of historical documents, HSA4 was developed with local streets and single-family houses as early as 1890. A school building and several small retail buildings were developed within HSA4 prior to 1928. Service stations and auto repair facilities were located at the northwest and southwest corner of Sentous Street and 12th Street from the 1930s through the 1960s. In 1970/1971, the current Cherry Street Garage was developed on the northern majority of HSA4, north of Pico Boulevard, in conjunction with the development of the West Hall to the east of the site, across Sentous Street (also known as Cherry Street and now

referred to as L.A. Live Way). The residential and commercial properties remained on the southern portion of HSA4, south of Pico Boulevard, until the area was cleared prior to 1989, and developed with the existing Bond Street Parking Lot in conjunction with the development of the South Hall. HSA4 has remained essentially unchanged since the development of the current Cherry Street Garage and Bond Street Parking Lot. Based on the prior uses within HSA4, HRECs identified within this area include TPH, VOCs, and metals.

c. Existing Local Area Conditions (Outside the Project Site)

The Project Site is bound to the north by Chick Hearn Court (formerly 11th Street), to the east by Figueroa Street, to the south by Venice Boulevard, to the southwest by a transition ramp between the I-10 Freeway and I-110 Freeway and to the west generally by the I-110 Freeway. North of Chick Hearn Court is a large entertainment complex known as L.A. LIVE, which includes restaurants, hotels, residential uses, office uses, concert venues and movie theaters. East of Figueroa Street are numerous paved surface parking lots, a restaurant and satellite sports broadcasting facility (1248 South Figueroa Street, east of Gilbert Lindsay Plaza), a multi-family residential structure (1300 South Figueroa Street, at the intersection of Pico Boulevard and Figueroa Street), and a Honda automotive dealership (1540 South Figueroa Street, at the northeast corner of the intersection of Venice Boulevard and Figueroa Street). South of Venice Boulevard are automotive sales facilities (Toyota and an affiliated used auto sales lot at 1600 South Figueroa Street) and the I-10 Freeway. Southwest of the Project Site, adjacent to the freeway on/off ramps and transition overpasses between the I-10 and I-110 freeways, is a small development of multi-family residential and commercial structures and a metal recycling facility, which are oriented around a cul-de-sac, Wright Street. West of the I-110 Freeway are dense developments of residential and commercial structures.

Based upon the site reconnaissance and the information provided in the Environmental Data Resources (EDR) reports, their distance from the Project Site, the local hydrogeologic conditions, and their current regulatory status (case closed), existing operations at the surrounding properties do not represent an environmental concern to the Project Site.

d. Existing On-Site Conditions

(1) Hazardous Materials Database Site Listing and Regulatory Agency Review

As part of the Phase I Environmental Site Assessment, EDR reports of standard environmental record sources were prepared. The EDR reports involved queries into various local, state, and federal environmental agency databases to ascertain whether the Project Site is listed due to environmental concerns. Requests for information regarding the environmental conditions at the Project Site were also submitted to the City of Los Angeles Fire Department (LAFD) Underground Tank Division, LAFD Hazardous Materials Records, South Coast Air Quality Management District (SCAQMD), and the Regional Water Quality Control Board (RWQCB).

(a) EDR Report

The Project Site is identified on multiple published regulatory database lists and EDR specific database listings. The main Convention Center address, 1201 South Figueroa Street, is identified on the Resource Conservation and Recovery Act (RCRA) Small Quantity Generator (SQG), UST, HAZNET, Leaking UST (LUST), and Drycleaners Facilities lists. The South Hall address, 1301 South Figueroa Street, is identified as the location of permitted USTs. The Venice Boulevard Garage address, 1501 South Figueroa Street, is identified as the location of a permitted UST. In addition, the address for STAPLES Center, 1111 South Figueroa Street, is identified on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), Spills, Leaks, Investigations, and Cleanups (SLIC), and UST lists.

The Convention Center (West Hall, South Hall, and Venice Boulevard Garage) is also permitted for the current UST operations and no LUST cases have been identified as associated with these permitted USTs. However, the LUST listing identified does not provide details regarding this case, with the exception of the leak discovery date (May 11, 1998), the leak report date (June 10, 1988) and the case closure date (July 13, 1998). It is not known to which historic or current UST this LUST listing is affiliated. Therefore, based on the incomplete information for this LUST case, this LUST represents a potential environmental concern for the Project Site.

The Convention Center is also permitted as a hazardous waste generator and has disposed of regulated waste under the Convention Center EPA generator numbers, as well as under bills of lading and temporary EPA generator numbers. In general, the majority of waste generated and transported from the site is classified as asbestos-containing waste, PCB-containing waste, fuel components/tank sludge, unspecified oil-containing waste, aqueous solutions and oxygenated solvents. Temporary waste generated from the

Convention Center (1201 South Figueroa Street) includes additional asbestos containing waste and photo-processing waste. The source of the photo-processing waste is unknown; however, it is likely associated with photography at past exhibits at the Convention Center. There are no violations identified in any of the RCRA SQG or HAZNET listings for the main Convention Center address (1201 South Figueroa Street). Thus, the disposal of regulated waste does not represent an environmental concern at the Project Site.

In addition, the Convention Center is identified as a “dry-cleaning and laundry services (except coin-operated)” facility in the EDR report. The listing identifies the City of Los Angeles/City of Los Angeles Department of General Services as the owner/responsible party. Based on information provided in the EDR report, the manifested waste transported from this address, 1201 South Figueroa Street, does not include the regular disposal of halogenated solvent waste typically generated as part of dry cleaning plant operations, and instead has consisted primarily of asbestos containing waste, waste oil and mixed oil, organic liquids with metals, organic solids, oxygenated solvents (acetone, butanol, ethyl acetate, etc.) and PCB-containing waste from at least 1993 through 2009. Two (2) isolated disposals of liquids containing halogenated organic compounds were reported in 2008 and 2009, totaling approximately 1.1 tons. The SCAQMD records reviewed for the Project Site did not identify the presence of permitted dry cleaning equipment. Therefore, based on the site reconnaissance, the absence of SCAQMD permitted dry cleaning emission equipment, and the absence of regular hazardous waste removal of dry cleaning related wastes, the dry cleaning listing is believed to be erroneous and not a reflection of operations conducted by Convention Center at the Project Site. Therefore, this dry cleaning listing does not represent an environmental concern to the Project Site.

As noted above, the EDR report identified STAPLES Center as a CERCLIS site. This listing is identified with the Democratic National Convention as the responsible party and the status (specified as non-National Priority List (NPL)) of this site is identified as a Removal Only Site (No Site Assessment Work Needed). The site description is stated as “to track counter-terrorism actions and funding for the Democratic National Convention at the Staples Center in LA.” In addition, the EPA’s CERCLIS website confirmed that the CERCLIS listing is not on the NPL. Therefore, this listing does not represent an environmental concern to the Project Site.

The SLIC listing for STAPLES Center is duplicated with two (2) listings in the EDR report. The SLIC listing pertains to a cleanup of TPH, VOCs, and heavy metals on-site in the area of STAPLES Center. The case was opened in April 1999, with remediation beginning in June 2002, and closed as of June 1, 2005. Specifics regarding the initial impact, remediation methods and cleanup were not included in the EDR files or a subsequent check with the State of California’s online SLIC database. However, based upon the closure date, this SLIC listing was remediated and closed according to current

regulatory standards. Thus, this former SLIC cleanup does not represent an environmental concern to the Project Site.

STAPLES Center is permitted for the current operation of one (1) UST and no LUST cases have been identified as associated with this permitted UST. STAPLES Center is also listed on the HAZNET list for the disposal of regulated waste under manifest. In general, the majority of waste generated and transported from the site is waste oil/mixed oil, paint sludge, oil/water separator sludge, liquids with halogenated solvents and other organic solids. There were no violations identified in the HAZNET listings. The legal and responsible manifested disposal of regulated waste does not represent an environmental concern to the Project Site.

(b) Regulatory Agency Review

LAFD Underground Tank Division

Based on available UST records on-file with the LAFD Underground Tank Division, at least twenty partially documented UST removals occurred during the Convention Center expansion from 1989 through 1993 (South Hall, Gilbert Lindsay Plaza, and Venice Boulevard Garage). The majority of USTs removed from this area were approximately 500-550-gallons in capacity, with some around 200-gallons and several as large as 1,000-gallons.

The earliest documented removal of USTs on-site dates back to July 1989, at which time four (4) 500-gallon USTs were removed from three (3) locations in the general South Hall construction area (south of Pico Boulevard, west of Figueroa Street, north of Venice Boulevard and east of L.A. Live Way (Cherry Street at the time of construction). The exact location of the USTs was not provided. Sampling beneath the USTs identified the presence of elevated concentrations of TPH in the gasoline range, as well as associated VOCs. Additional soils were excavated from the UST pits, with a maximum excavation depth in one area to 33 feet bgs. A distinct stiff clay layer encountered 33 feet marked the lower boundary of contaminants as fluids were observed to pool on top of the layer. The excavated soil was removed from the site, soil samples collected at the base and sidewalls of the excavation area and copies of all pertinent documents forwarded to the LAFD, with an associated closure letter issued by the LAFD in October 1989, for this round of remediation. Following the excavation activities, an additional UST, approximately 275-gallon capacity, was encountered and removed. Elevated TPH levels identified below the 275-gallon UST necessitated additional excavation in the area. The southern boundary of this excavation area was noted to be near 15th Street. A remedial action plan submitted to LAFD in October 1998, for this area was approved for work; however, additional documentation regarding this excavation was not included in the LAFD Underground Tank Division files.

A number of UST removals and removals of industrial clarifiers encountered beneath the former automotive-related facilities were removed under the direction of the City of Los Angeles Department of Public Works, Bureau of Engineering, Geotechnical Services between September 1990 and May 1991. Memos and reports prepared by Geotechnical Services, and included in the LAFD files, referenced the State of California Leaking Underground Fuel Tank (LUFT) guidelines (1989) as recommended cleanup levels. One (1) tank removal area expanded by the Geotechnical Services department occurred near the 550-gallon UST encountered in the central area of the South Hall. This area required additional remediation by excavation, which was temporarily delayed during construction due to the presence of heavy equipment overlying the impacted area. A remedial action plan for the area was submitted to the LAFD and later executed in April 1991. As of August 1991, Geotechnical Services issued a closure report to the LAFD which stated that “all known tanks, clarifiers and soil containing contaminants above allowable levels have been removed by licensed excavators, and transported and manifested by licensed hauling to the appropriate waste disposal facilities, under direction of the LAFD.” Additionally, due to the depth of groundwater at the site and the relatively immobile nature of diesel and waste oil contaminants, groundwater impact was not cited as a potential concern. A follow up “closure letter” from the LAFD was not included in the files.

One of the last USTs to be removed during the Convention Center construction and renovation period was the 500-gallon capacity UST formerly containing gasoline, which was identified during an expansion of Figueroa Street. The UST removal was permitted with the LAFD in February 1993, and a soil sample collected beneath the tank invert following removal contained no chemicals of concern above the laboratory method detection limit. The LAFD issued a closure letter for the UST on June 3, 1993.

The final UST removed during the Convention Center expansion from 1989 through 1993 (South Hall, Gilbert Lindsay Plaza, and Venice Boulevard Garage) was a 200-gallon capacity UST (some conflicting information states 280-gallons as the tank size) presumed to have contained waste oil, which was identified just west of Figueroa Street under the present-day Gilbert Lindsay Plaza, removed in 1993, after the removal of the 500-gallon capacity UST in February 1993.

The LAFD files reviewed did not include any removal reports or permits related to former USTs located in the area of the West Hall or parking structures and surface lots along L.A. Live Way. However, historic USTs previously operated at the 1201 South Figueroa Street portion of the Project Site by the Convention Center included a 2,000-gallon capacity gasoline UST, a 280-gallon capacity diesel fuel UST, and a 2,000-gallon capacity diesel fuel UST.

The 2,000-gallon capacity gasoline UST was reportedly located in the small exterior asphalt parking/storage lot located adjacent to the southwest corner of the West Hall, at the northeastern corner of the intersection of Pico Boulevard and L.A. Live Way. According to LAFD records, the UST and associated piping and dispenser were removed in February 1998. The reason for UST removal provided in the closure report was the City of Los Angeles' compliance with the removal of all single-walled USTs by December 1998. The UST removal process was permitted with the LAFD. Additional records on-file with the LAFD for the 2,000-gallon capacity gasoline UST included an assessment conducted of soils surrounding the UST following a tank integrity test which identified a leak in the UST piping. In a letter dated March 23, 1994, the LAFD stated that "Based on the information provided, this Department concurs with your proposal on the removal and replacement of the underground tanks at this location. Please provide the Underground Tank Plan Check Unit with a remedial action plan immediately following the removal of the underground tank and dispenser." The LAFD UST files did not include a follow up remedial action plan, remediation report, soil removal documentation or additional sample analytical reports. However, in June 1998, the LAFD issued a letter which stated that "no further action is required at this time." Based on the 1994 assessment and correspondence between the City of Los Angeles Geotechnical Services and LAFD, the area of this former gasoline UST was impacted with BTEX and TPH in the gasoline range, and the absence of available documents related to remediation of the area represents an environmental concern to the Project Site.

According to LAFD records and a UST removal report generated by RCNA Corporation of Corona, California, in January 1998, the 280-gallon capacity diesel fuel UST was in the approximate location of the present-day 1,005-gallon UST, located at the northwest exterior of the West Hall (near the Green Fire Pump and Generator Rooms), and the 2,000-gallon capacity diesel fuel UST was in the approximate location of the present-day 2,000-gallon capacity UST, located at the southwest exterior of the West Hall structure (near the Purple Fire Pump and Generator Rooms). The USTs were removed from the site in December 1997, under permit by the LAFD, with samples collected beneath each tank invert following removal. In response to the removal report, the LAFD issued a letter on August 13, 1998, which stated that "Based on the formation provided to date, no further action is required at this time." Based on the sampling documented during the UST removal at these locations and the permitting and approval of the UST removal process by the LAFD, these two (2) former on-site diesel fuel USTs do not represent an environmental concern to the Project Site.

Documented UST removal which occurred during the construction of STAPLES Center (1111 South Figueroa Street) included the removal of one (1) 150-gallon capacity UST partially filled with sand and presumed to have previously contained fuel oil in March 1999, and two (2) 500-gallon capacity USTs containing diesel fuel in April/May 1998. All

three (3) of the USTs removed from this area were removed under permit and oversight by the LAFD, with samples collected beneath each tank invert at the time of removal. Petroleum hydrocarbons encountered beneath the USTs were determined to be below LAFD cleanup action levels and the LAFD issued closure letters for the removed tanks. On August 10, 1998, the LAFD issued a letter stating that based on the report submitted for the two (2) 500-gallon USTs removed from the site (report by Bryan A. Stirrat & Associates, dated July 9, 1998), the department determined that “no further action is required at this time.” On August 29, 2000, the LAFD provided a letter stating that based upon the removal report for the 150-gallon UST (report by Bryan A. Stirrat & Associates, dated August 29, 2000), that the department determined that “no further action is required at this time.” Based upon the LAFD involvement in the permitting and closure of the UST removal process, these three (3) former on-site USTs in the vicinity of STAPLES Center do not represent an environmental concern to the Project Site.

LAFD Hazardous Materials Records

The Convention Center and STAPLES Center each maintain hazardous materials business plans with the LAFD. The business plans disclose the hazardous materials stored at each facility and are updated on an as-needed basis in general compliance with the State of California Certified Unified Program Agency (CUPA) requirements. The Convention Center hazardous materials disclosure, which was most recently updated in June 2011, includes all of the current/operational USTs, Freon storage for the chiller system, maintenance chemical storage (paints, hydraulic oil, compressed gases, etc) and the current on-site ASTs containing diesel fuel and propane, all of which were observed during the site reconnaissance to be stored in a responsible manner. There were no violations or hazardous materials concerns identified in the LAFD hazardous materials records for the Convention Center and any minor violations that did occur were all corrected.

The hazardous materials disclosure for STAPLES Center, which was most recently updated in August 2008, includes the storage of the following: diesel fuel (UST and AST), compressed gasses (acetylene, argon, nitrogen, etc), Freon, ethylene glycol, hydrochloric acid, caustic soda, and sulfuric acid; which are utilized in the general operation and maintenance of STAPLES Center. There were no violations or hazardous materials concerns identified in the LAFD hazardous materials records for STAPLES Center and any minor violations that did occur were all corrected.

South Coast Air Quality Management District

The Convention Center and STAPLES Center are generally permitted for emissions equipment associated with the maintenance and operation of the buildings and emergency preparedness. Specifically, the Convention Center is permitted for the usage of boilers,

emergency generators, fire pumps, spray booth and gasoline storage/dispensing. The Convention Center permits are currently in good standing with the SCAQMD, with no outstanding violations or notices to comply. STAPLES Center is permitted for the usage of boilers, emergency generators, a fire pump, and a charbroiler. STAPLES Center permits are currently in good standing with the SCAQMD, with no outstanding violations or notices to comply.

(2) Hazardous Materials Use, Storage, and Management

Chemicals utilized on-site at the Convention Center primarily consist of materials related to maintenance of the Convention Center and fuel storage for vehicles, emergency equipment. Chemicals utilized on-site at STAPLES Center are primarily comprised of materials related to the maintenance of the arena and fuel storage for emergency equipment.

The storage of paints and related materials were observed in the paint shop located on Level 1 of the West Hall, near the western ramp connecting the West Hall with the South Hall. The paint shop was noted to have flammable materials, cabinets storing paints and associated chemicals, as well as paint containers stacked in the general area. The paint shop was noted to be generally neat and orderly. Also observed in this area was a paint spray booth, which is permitted for usage with the SCAQMD. There have been no known violations or notices to comply associated with the paint booth usage. No hazardous materials usage was noted in the areas utilized as electrical shop storage or recycling center operations.

Chemicals utilized in the boiler rooms and Central Plant consisted of water treatment chemicals, scale inhibitors and refrigerants. Boilers were observed on the ground level of the West Hall and in the penthouse/Level 3 mechanical areas. The central plant for the Convention Center is located on Level 2 of the West Hall.

A representative for STAPLES Center and the LAFD hazardous materials business plan identified the Central Plant as the storage location for chemicals associated with water treatment. Additional water treatment chemicals, Freon and chilling agents are utilized in the ice plant located on the Event Level.¹ Paint associated with the ice and facility maintenance, as well as oils for equipment maintenance, are stored and utilized on the Event Level.

¹ *The Event Level is a subterranean level of STAPLES Center which houses maintenance areas, operations facilities, mechanical areas, maintenance shop, and support rooms for the professional teams affiliated with the arena.*

Sump pumps were observed to be utilized in the site buildings developed with subterranean levels to bring any wastewater occurring below grade to the level of the sanitary sewer. A sewer ejector pump at STAPLES Center is utilized to direct wastewater generated on the Event Level (including ice melting/maintenance operations associated with the onsite professional hockey team) to the sanitary sewer at surface grade. In addition, the presence of a kitchen grease interceptor in the “Orange” parking area of the West Hall, numerous three-stage clarifiers in the driveways leading to/from the parking areas of the South Hall, and in a vehicle wash area located within the secured surface parking area to the west of the South Hall were also observed. The interceptor observed in the West Hall reportedly processes kitchen wastewater generated in food preparation and was noted to have a “sewage-type” odor emanating from the chambers. The interceptors noted at the South Hall driveways and in the vehicle wash area were noted to be of three-stage construction, with no discernible odors or staining observed.

Two (2) in-ground grease interceptors and one (1) aboveground kitchen waste grease collection container were reported at STAPLES Center. A 4,000-gallon grease interceptor is located on the Event Level and one (1) 3,000-gallon grease interceptor is located at grade level. The aboveground kitchen grease collector is located in the loading dock area. The interceptors and aboveground grease receptacle are reportedly pumped and serviced on a regular basis.

(3) Hazardous Wastes

As noted above, the Project Site is permitted as a hazardous waste generator for asbestos containing waste, PCB-containing waste, fuel components/tank sludge, unspecified oil-containing waste, aqueous solutions, oxygenated solvents, waste oil/mixed oil, paint sludge, oil/water separator sludge, liquids with halogenated solvents, and other organic solids. Additional environmentally regulated hazardous wastes identified or presumed to be at the Project Site include universal, electronic, and radioactive wastes including, but not limited to, fluorescent light tubes, thermostats, fire detection/alarm devices, exit signs, CRTs, batteries and aerosol cans.

(4) Asbestos

Asbestos is a naturally occurring mineral made up of microscopic fibers. Asbestos has unique qualities which include its strength, fire resistance, resistance to chemical corrosion, poor conduction of heat, noise, and electricity, and low cost. Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Despite its useful qualities, asbestos becomes a hazard if the fibers separate and become airborne. Inhalation of airborne asbestos fibers could cause lung diseases. Any building, structure,

surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs.

Testing for asbestos was not conducted as part of the Phase I Environmental Site Assessment for the Project Site.² However, as described above, asbestos was widely utilized in the building industry prior to 1979 for a variety of uses, including acoustic and thermal insulation and fireproofing. Therefore, based on the date of construction of the Project Site buildings (early 1970s through late 1990s), there is a potential for the presence of ACMs to be on-site in a wide variety of building materials.

(5) Lead-Based Paints

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. While adults can be affected by excessive exposure to lead, the primary concern is the adverse health effects on children. The most common paths of lead exposure in humans are through ingestion and inhalation. Lead-based paint is of concern both as a source of exposure and as a major contributor to lead in interior dust and exterior soil.

Testing for lead-based paint was not conducted as part of the Phase I Environmental Site Assessment for the Project Site.³ However, as described above, lead compounds were widely utilized in the building industry prior to 1972 for a variety of uses. Therefore, based on the original age of the current site improvements (early 1970s through early 1990s), there is a potential for the presence of lead-based paint.

(6) Polychlorinated Biphenyls

Typical sources of PCBs include electrical transformer cooling oils, fluorescent light fixture ballasts and hydraulic oil. In 1976, the U.S. EPA banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil. By 1985, the U.S. EPA required that commercial

² As described further in Appendix AA of this Draft EIR, the Phase I Environmental Site Assessment was conducted in accordance with the American Society for Testing and Materials Standard of Practice E1527-05. In accordance with these standards, physical testing of buildings is not typically performed during this stage.

³ Ibid.

property owners with transformers containing more than 500 parts per million (ppm) PCBs must register the transformer with the local fire department, provide exterior labeling, and remove combustible materials within five meters (40 Code of Federal Regulations 761.30: "Fire Rule").

Multiple secured transformer enclosures were observed throughout the Project Site during the site reconnaissance. The majority of transformer enclosures were labeled as "No Polychlorinated Biphenyl In This Station;" however, some enclosures were unmarked with regard to PCB content. The transformers are owned and operated by the Los Angeles Department of Water and Power (LADWP), and access to the room is restricted to LADWP representatives.

The Project Site buildings are equipped with multiple hydraulic escalators, hydraulic lifts, and passenger elevators (hydraulic and cable-traction). Additionally, hydraulic compactors were observed on-site. At the time of the site reconnaissance, some of the hydraulic equipment was noted to have minor to moderate staining in the vicinity of the reservoir. No significant losses of hydraulic fluid or equipment failure due to fluid loss were reported.

PCBs may also be found in capacitors and fluorescent lighting unit ballasts. At the time of the site inspection, the fluorescent lighting ballasts were inaccessible for inspection. Given the original date (1971) of construction of portions of the Project Site, there is potential for the ballasts to contain PCBs.

(7) Aboveground and Underground Storage Tanks

The Convention Center currently operates seven (7) USTs containing gasoline or diesel fuel (ranging in capacity from 550-gallons to 6,000-gallons), three (3) ASTs containing diesel fuel (ranging in capacity from 120-gallons to 300-gallons), and one (1) AST containing propane. Three (3) closed in place USTs (280-gallon capacity) were also reported.

The active USTs and ASTs are permitted for usage with the LAFD. The 6,000-gallon UST containing gasoline is permitted for usage with the SCAQMD, as well. The USTs located at the South Hall and Venice Boulevard Garage (2,000-gallon diesel, 2,000-gallon diesel, 500-gallon diesel, and 6,000-gallon gasoline) were permitted for installation and integrity tested in 1992. In addition, according to partial records on file with the LAFD, the 2,000-gallon UST and two (2) 1,000-gallon USTs containing diesel fuel at the West Hall are believed to have been installed on-site in late 1997/early 1998. In addition, according to LAFD records and information provided by the Convention Center representative, modifications to piping associated with the USTs and tank sumps have

been updated in accordance with current regulations. The emergency equipment associated with the USTs (emergency generators and fire pumps) are equipped with small attached reservoirs which hold a small quantity of additional fuel. All of the on-site diesel fired engines are permitted for operation with the SCAQMD.

The 280-gallon USTs closed in place in the Blue and Orange Fire Pump Rooms were closed in 2008, under permit with the LAFD. The LAFD files made available did not include a permit or integrity test for the 280-gallon UST located in the Green Fire Pump Room. There were no "No Further Action" letters included in the LAFD files for the three (3) closed in place 280-gallon capacity USTs.

The vent line associated with the 2,000-gallon UST located just south of Pico Boulevard (exterior north of the South Hall) was abandoned in place in 2005. The vent pipe, which had been cast in place into the South Hall structure during construction, required replacement. Also completed at that time was the abandonment in place of diesel fuel supply and return lines in Fire Pump Room #1 of the South Hall. All of the abandonment operations were completed under permit with the LAFD in May 2005.

STAPLES Center currently operates one (1) 500-gallon capacity UST containing diesel fuel and one (1) 3,000-gallon capacity AST containing diesel fuel. The UST, which is of double-walled steel construction supplies diesel fuel for the on-site fire pumps. The AST, which is also of double-walled steel construction supplies diesel fuel for the on-site emergency generator. The UST and AST, which were installed at the time of construction in 1999, are located near the Central Plant (near the intersection of Georgia Street and Chick Hearn Court, northwest of the arena structure) are permitted for operation through the LAFD. The emergency engines associated with the tanks (emergency generator and fire pumps) are equipped with small attached reservoirs which hold a small quantity of additional fuel. The diesel fired engines are permitted for operation with the SCAQMD.

(8) Oil and Gas

Methane is a colorless, odorless natural gas. Although methane is not toxic, it is highly combustible and potentially explosive at concentrations above 55,000 parts per million (ppm) in the presence of oxygen. Methane typically can be found at oil fields, oil wells, and landfills. Methane has the potential to migrate into buildings through physical pathways that include cracks in concrete floor slabs, unsealed conduits or utility trenches, unsealed dewatering sumps, and other small openings common in building construction. Methane gas can also reach the surface through natural geologic features which may facilitate vertical, lateral, or oblique migration. The geologic features that can serve as potential pathways include porous and permeable formations, fault zones, and aquifers. The accumulation of methane below the ground due to pavement and structures can result

in elevated concentrations, creating an explosion risk. The City of Los Angeles has established methane zones, which indicate a high risk for methane exposure, and methane buffer zones, which indicate a lower risk for methane exposure.

The Project Site is located within a designated City of Los Angeles Methane Zone and will require the performance of site-specific methane soil gas testing in compliance with the City of Los Angeles Department of Building and Safety (LADBS) Methane Mitigation Standards, as discussed further below.

3. Environmental Impacts

a. Methodology

To evaluate potential impacts, existing and proposed on-site environmental safety concerns were identified, quantified, and compared against the established safety standards and regulations to determine if the Proposed Project would result in environmental safety impacts. The analysis of the potential impacts regarding hazardous materials management, the generation and disposal of asbestos and lead-based paint, and the generation and disposal of polychlorinated biphenyl-containing materials was based on-site evaluations, plans and information from the Applicants.

A Phase I Environmental Site Assessment for the Project Site prepared by Citadel Environmental Services, Inc. was reviewed. The Phase I Environmental Site Assessment included a review of historical maps and building permits, searches of hazardous materials databases, and site reconnaissance to determine if any recognized environmental concerns exist on the Project Site. For a more detailed description of this Phase I Environmental Site Assessment and its findings, please refer to Appendix AA, Phase I Environmental Site Assessment, of this Draft EIR.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to hazards and hazardous materials. These questions are as follows:

Would the project:

- 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 0.25 mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment?
- For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing in the project area?
- Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?
- 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.

In the context of the above questions from Appendix G of the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide states that the determination of significance with regard to impacts associated with risk of upset/emergency preparedness and human health hazards shall be made on a case-by-case basis, considering the following factors:

Risk of Upset/Emergency Preparedness

- The regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

Human Health Hazard

- The regulatory framework for the 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.

Based on these criteria, the Proposed Project would have a significant impact on human health hazard if:

- The Project would expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards.

c. Project Design Features

Proposed Project design, construction, and operations would comply with all applicable laws, rules and regulations (also known as plans, programs and policies) associated with hazardous materials management. In addition, the Applicants' current comprehensive policies and programs specifically related to hazardous materials and waste management would continue to be implemented. For example, as is currently the Applicants' practice, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Monitoring of the Applicants' hazardous materials management would be conducted by Los Angeles Fire Department, and other applicable regulatory authorities, as appropriate. Likewise, the disposal of on-site generated hazardous waste would occur in accordance with all applicable regulations.

In addition, existing design and construction requirements and management practices related to asbestos, ACMs, or LBP would continue at the Project Site in accordance with applicable federal, state, and local regulations. The use of only non-polychlorinated biphenyl containing electrical equipment in all new and replacement construction would continue at the Project Site. Also, the design, construction, and operation of Proposed Project uses within a Methane Zone would occur in accordance with applicable federal, state, and local regulations related to environmental safety.

The Proposed Project would also implement Project Design Features L-1 to L-4 as follows:

Project Design Feature L-1: The Applicants shall prepare and implement a Soil Management Plan approved by the Department of Toxic Substances Control, pursuant to Department of Toxic Substances Control's Voluntary Cleanup Program, or other applicable state or local regulatory agency providing oversight, to address potential contamination in soil within the Project Site. The approved Soil Management Plan shall include procedures for soil sampling and remedial options that may include removal (excavation), treatment (*in-situ* or *ex-situ*), or other measures, as appropriate. If soil contamination is suspected to be present, prior to excavation and grading, the South Coast Air Quality Management District's (SCAQMD) Rule 1166 shall be implemented, as appropriate. If soil contamination is not suspected, but is observed (i.e., by sight, smell, visual, etc.) during excavation and grading activities, excavation and grading shall be temporarily halted and redirected around the observed area(s) until the appropriate evaluation and follow-up measures are implemented, as contained in SCAQMD's Rule 1166. The contaminated soil discovered shall then be evaluated and managed in accordance with the approved Soil Management Plan in order for grading activities to resume.

Project Design Feature L-2: A comprehensive asbestos-containing materials survey shall be conducted on all structures prior to renovation or demolition. If any Regulated Asbestos-Containing Materials (RACM), Category I/Class I Non-Friable and Category I/Class II Non-Friable ACMs that may become friable are determined to be present, they shall be removed prior to renovation or demolition activities taking into account the following: EPA's National Emission Standards for Hazardous Air Pollutants (NESHAPs) and South Coast Air Quality Management District's Rule EPA's NESHAPs 1403. EPA Guidance Document 340/1-92-013 "A Guide to Normal Demolition Practices under the Asbestos NESHAPs" shall be referred to prior to initiation of a proposed demolition project. In addition to asbestos regulations that control the release of asbestos to the ambient environment, federal and State OSHA regulations outlining specific work practices for handling ACMs shall be followed.

All asbestos removal shall be performed by an experienced, state-licensed, Cal/OSHA- and SCAQMD-registered asbestos contractor. All work shall take place under the guidance of an independent, California Certified Asbestos Consultant. The Consultant shall be responsible for reviewing the redevelopment drawings, designing engineering controls used to control airborne asbestos contamination, visual inspections of engineering controls, and ambient air monitoring to determine airborne fiber levels.

Project Design Feature L-3: A comprehensive lead-based paint survey shall be conducted on all structures prior to renovation or demolition. In the

event that lead-based paint is present, all removal activities shall conform to federal and California OSHAs regulations (e.g., Interim Final Rule found in 29 CFR Part 1926.62).

Project Design Feature L-4: The Applicants shall submit to the City Fire Department and City Department of Building and Safety, as applicable, an updated emergency response and/or evacuation plan, as appropriate, to include operation of the Proposed Project. The emergency response plan shall include but not be limited to the following: mapping of evacuation routes for vehicles and pedestrians, and the location of the nearest hospital and fire departments. The update to this plan shall be coordinated with the Proposed Project's Construction Traffic Management and Control Plan (see Mitigation Measure B.1-30, Section IV.B.1, Transportation).

d. Project Impacts

(1) Prior Uses of the Project Site

As described above, the area designated as HSA1 is the existing West Hall. Given the prior uses within HSA1 and the HRECs identified within this area, development of the Project Site within this area may encounter potential soil contamination due to USTs and soil contamination in the form of TPH, VOCs, PCBs, SVOCs, and metals, and potential hazards related to an abandoned oil well beneath the existing West Hall. Further, construction over soils containing volatile chemicals may result in a health risk as a result of vapor intrusion into the structure.

As previously discussed, HSA2 covers the entire footprint of the existing South Hall (which is bound by Pico Boulevard to the north, Figueroa Street to the east, Venice Boulevard to the south and L.A. Live Way to the west), the Concourse Building (which extends to the north over Pico Boulevard), and the current Gilbert Lindsay Plaza area (located east from the Concourse Building to Figueroa Street). HSA3 covers the entire footprint of the existing STAPLES Center, which extends south from Chick Hearn Court (11th Street) to the Gilbert Lindsay Plaza, and west from Figueroa Street to the West Hall. Based on the prior uses identified within these areas, such as auto service, fueling, and repair, dry cleaning, and other industrial uses, contaminated soil has the potential to be present within HSA2 and HSA3. The soil contamination may include include TPH, VOCs, SVOCs, and metals. Further, construction over soils containing VOCs may result in a health risk as a result of vapor intrusion into the structure.

As noted above, HSA4 encompasses the existing Cherry Street Garage located west of L.A. Live Way, south of Chick Hearn Court and north of Pico Boulevard, as well as the surface parking lot located south of Pico Boulevard, between L.A. Live Way and Bond

Street. The Cherry Street Garage was developed in association with the West Hall in 1970/1971, and is constructed entirely on-grade, with no subterranean levels. In addition, the surface parking lot was developed in association with the grading of the South Hall in 1989. Given the prior uses within HSA4, the HRECs identified within this area, and the limited surface preparation or excavation required to construct the existing Cherry Street Garage and the surface parking lot, development of the Project Site within this area may encounter potential soil contamination in the form of TPH, VOCs, and metals.

Based on the above, it is possible that development within the areas designated as HSA1, HSA2, HSA3, and HSA4 could encounter contaminated soil or underground features such as USTs and an abandoned oil well. However, Mitigation Measures L-1, L-2, and L-12 would be incorporated to provide that any contaminated soils encountered during Proposed Project construction would be treated or disposed of properly. In addition, Mitigation Measure L-3 would provide that any USTs uncovered during construction be removed in accordance with applicable regulations. Moreover, Mitigation Measure L-4 would provide that Proposed Project construction activities meet construction requirements associated with the former on-site oil well as well as provide that if construction activities uncover remnants of, or materials associated with, the former oil well or additional currently unknown oil wells these would be treated in accordance with applicable regulations.

(2) Hazards Associated with Hazardous Sites Listing and Regulatory Agency Review

As discussed above, while the Project Site is identified in the databases reviewed in the EDR report, the potential environmental impact from a majority of these listings is considered low due to the type of regulatory listings and involvement of a regulatory agency in remedial efforts. However, there are a few locations where this is not the case. Specifically, as described above, the main Convention Center address, 1201 South Figueroa Street, is listed as the site for a LUST with no tank, leak, or cleanup specifics provided. Thus, this listing is considered a REC due to potential soil contamination in the form of TPH, VOCs and/or metals. In addition, LAFD records show a 2,000-gallon capacity gasoline UST removed from the Convention Center at the northwestern corner of L.A. Live Way and Pico Boulevard in 1998 with soil contamination and no documented soil remediation. Thus, this former UST removal is considered a REC due to potential soil contamination in the form of TPH and VOCs. Furthermore, records of a 275-gallon UST removed from the South Hall area, north of 15th Street, in 1989 show no specific location with documented soil contamination. Thus, this is considered a REC due to potential soil contamination in the form of TPH, VOCs, and/or metals.

Based on the above, it is possible that contaminated soil or underground features such as USTs exist below these specific areas of the Project Site. However, Mitigation

Measures L-1 through L-3, L-5, and L-12 would be incorporated to provide that any contaminated soils or USTs that are encountered are treated in accordance with applicable regulations. As such, with incorporation of these mitigation measures, impacts would be reduced to a less than significant level.

(3) Hazardous Materials Use, Storage, and Management

During on-site grading and building construction, fuel, and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, handled, and stored on the Project Site. The use, handling, and storage of these materials could increase the possibility for exposure of people and the environment to hazardous materials. However, compliance with the project design features as well as existing regulations and plans at the Project Site during construction would reduce this risk. Based on the conditions observed during the site reconnaissance and the hazardous materials disclosures reviewed for the Project Site, the existing hazardous materials usage operations on-site would not represent an environmental concern to the development of the Proposed Project. Therefore, impacts associated with hazardous materials usage, storage, and management during construction would be less than significant.

As discussed above, hazardous materials currently utilized on-site include materials related to the maintenance of the Convention Center and STAPLES Center arena and fuel storage for vehicles and emergency equipment. The Proposed Project has the potential to increase the acquisition, use, handling and storage of these hazardous materials on-site through the expansion of existing facilities and development of new facilities. With continued implementation of hazardous materials management at the Project Site and continued compliance with applicable laws, as well as implementation of the identified project design features, impacts associated with the use, storage, and management of hazardous materials during operation of the Proposed Project would be less than significant.

As described above, the Project Site also contains several grease interceptors and three-stage clarifiers. Construction activities associated with the Proposed Project may require removal of these facilities. Therefore, Mitigation Measure L-6 is proposed below to ensure that all local sanitation district requirements and regulations are followed for proper removal and disposal. As such, with implementation of Mitigation Measure L-6, no significant impacts associated with the removal of on-site interceptors and clarifiers are anticipated.

(4) Hazardous Waste

There is the potential for on-site grading to increase the use, handling and storage of hazardous materials, and encounter contaminated soil, resulting in a corresponding increase in hazardous waste. Compliance with the Applicants' project design features, Mitigation Measures L-1, L-2, L-7, L-11, and L-12, as well as existing regulations and plans at the Project Site during construction of the Proposed Project would prevent exposure of people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste generation and disposal during construction of the Proposed Project would be less than significant.

Existing hazardous waste at the Project Site includes asbestos containing waste, PCB-containing waste, fuel components/tank sludge, unspecified oil-containing waste, aqueous solutions, oxygenated solvents, waste oil/mixed oil, paint sludge, oil/water separator sludge, liquids with halogenated solvents, and other organic solids. Additional environmentally regulated hazardous wastes identified or presumed to be at the Project Site include universal, electronic, and radioactive wastes including, but not limited to, fluorescent light tubes, thermostats, fire detection/alarm devices, exit signs, CRTs, batteries, and aerosol cans. With implementation of the Proposed Project, it is anticipated that hazardous waste generating activities could increase. However, in compliance with the Hazardous Waste Source Reduction and Management Review Act (i.e., Senate Bill 14), the Applicants would implement source reduction measures to reduce the generation of hazardous waste on-site. For example, under STAPLES Center's ISO 14001 Environmental Management System, hazardous materials are subject to hazardous waste management programs and all chemicals brought into the site are subject to review and approval by management. With the implementation of existing hazardous waste reduction efforts on-site, and the fact that the majority of typical/operational hazardous waste is conveyed to licensed treatment, disposal, and resource recovery facilities, impacts associated with hazardous waste generation and disposal during operation of the Proposed Project would be less than significant.

Other potential environmental impacts related to the increased generation of hazardous waste are associated with potential releases of hazardous materials. Hazardous waste releases may result in potential injury if exposure takes place and, if not mitigated, result in soil and/or groundwater impacts. Compliance with applicable regulations related to the handling, storage and disposal of hazardous waste would ensure that no significant impact associated with the release of hazardous wastes occurs.

(5) Asbestos and Lead-Based Paints

Based on the years of construction for the buildings on the Project Site, there is a potential that asbestos, asbestos-containing materials, and lead-based paint could be encountered during construction activities. As part of the Proposed Project, several existing structures would be removed. The demolition of these structures would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition activities. However, Project Design Feature L-2 would require that a comprehensive asbestos-containing materials survey is conducted on all structures prior to renovation or demolition. The removal of asbestos is regulated by SCAQMD Rule 1403; therefore, any asbestos found on-site would be removed by a certified asbestos containment contractor in accordance with applicable regulations prior to demolition. Demolition activities may also have the potential for lead exposure due to lead-based paint. Project Design Feature L-3 would require that all procedural requirements and regulations are followed for proper removal and disposal of any lead-based paint found on-site. As handling and disposal of asbestos, asbestos-containing materials, and lead-based paint would be in accordance with all applicable laws, regulations, and project design features, construction of the Proposed Project would not expose people to substantial risk resulting from the release of or exposure to asbestos, asbestos-containing materials, or lead-based paint in excess of regulatory standards. Therefore, no significant impact associated with these hazardous materials is anticipated from construction of the Proposed Project.

New on-site construction and/or renovation due to the Proposed Project would include use of commercially sold construction materials that would not include asbestos, asbestos-containing materials, or lead-based paint and are therefore not anticipated to increase the occurrence of friable asbestos, asbestos-containing materials, or lead-based paint at the Project Site. Therefore, operation of the new development proposed at the Project Site is not anticipated to expose persons to friable asbestos or lead-based paint. In addition, per applicable regulations, workers associated with the Proposed Project would be protected by worker safety requirements. With existing laws and regulations, as well as implementation of the identified project design features, operation of the Proposed Project would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, no significant impact associated with asbestos, asbestos-containing materials, and lead-based paint is anticipated from operation of the Proposed Project.

(6) Polychlorinated Biphenyls

As discussed above, multiple secured transformer enclosures were observed throughout the Project Site, which were unmarked with regards to PCB content. The Project Site was also noted to include multiple hydraulic escalators, hydraulic lifts, passenger elevators (hydraulic and cable-traction), and hydraulic compactors. At the time

of the site reconnaissance, some of the hydraulic equipment was noted to have minor to moderate staining in the vicinity of the reservoir. However, no significant losses of hydraulic fluid or equipment failure due to fluid loss were reported. Based on the ownership of the transformers by LADWP and the continued service, cleaning, and inspections of the hydraulic equipment, the current operation of the transformers and hydraulic equipment does not represent an environmental concern to the development of the Proposed Project. PCBs may also be found in capacitors and fluorescent lighting unit ballasts. Given the original date (1971) of construction of portions of the Project Site, there is potential for the ballasts to contain PCBs. As part of the Proposed Project, several existing structures would be removed. The demolition of these structures would have the potential to remove on-site transformers, hydraulic equipment and ballast, resulting in a potential for exposure to PCBs. Therefore, Mitigation Measure L-8 is provided below to ensure that all procedural requirements and regulations are followed for proper removal and disposal of PCB-containing materials. Therefore, no significant impact associated with PCBs is anticipated from construction of the Proposed Project.

The new electrical systems to be installed in the Proposed Project would not contain PCBs. Therefore, during operation of the Proposed Project, maintenance of such electrical systems would not expose people to PCBs. In addition, the Applicants would continue to comply with applicable laws regulating PCBs. As such, the operation of the Proposed Project would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, no significant human exposure to PCBs is anticipated from the operation of the Proposed Project.

(7) Aboveground and Underground Storage Tanks

Proposed Project-related grading could uncover or disturb existing known and unknown USTs, which could lead to soil and/or groundwater impacts and the potential exposure of people and the environment to hazardous materials. If USTs or impacted soils are encountered, existing comprehensive policies and programs specifically related to environmental safety would continue to be implemented. In addition, Mitigation Measures L-1, L-2, and L-12 would be incorporated to provide that any contaminated soils encountered during Proposed Project construction be treated or disposed of properly and Mitigation Measure L-3 would provide that any USTs uncovered during construction be removed in accordance with applicable regulations. Therefore, a less than significant impact is anticipated.

Based on the site reconnaissance, all of the current on-site UST and AST operations were noted to be in general compliance with current regulatory requirements (LAFD, SCAQMD, Certified Unified Program Agency, etc), and no operational concerns were

noted. Expanded operations on the Project Site could require the installation and operation of additional aboveground storage tanks for the storage of motor oil, vegetable oil, propane, and other substances. Expanded operations on the Project Site could also require the installation and operation of additional underground storage tanks to accommodate increased hazardous materials demand. These additional underground storage tanks would be anticipated to contain hazardous materials similar to those utilized in existing operations on the Project Site. The increase in the number of ASTs and USTs on-site could potentially increase the potential for accidental releases and subsequent impacts to soil and surface water and groundwater, as well as the potential for environmental and human exposure to hazardous materials. However, new ASTs and USTs would be installed and maintained in accordance with applicable regulatory requirements. As such, implementation of the identified project design features and continued compliance with applicable laws associated with ASTs and USTs would minimize impacts to human health and the environment associated with ASTs and USTs, and no significant impacts are anticipated.

(8) Oil and Gas

As described above, the Project Site is located within a Methane Zone. Therefore, potentially significant impacts could occur during construction or operation of the Proposed Project.

Construction of the Proposed Project would require excavation of subsurface materials for building foundations, etc. As a result, construction workers could potentially be at risk during excavation activities if methane gases are present in high concentrations. Therefore, appropriate precautionary measures shall be taken to provide for construction worker safety. Mitigation Measure L-10 below will provide that potential methane impacts during construction are reduced to a less than significant level.

Given the location of the Project Site in a Methane Zone, new buildings and paved areas of the Proposed Project would be required to comply with the City's Methane Seepage Regulations and the specifications of the City of Los Angeles Department of Building and Safety as set forth in Section 91.7101, *et seq.* of the City's Municipal Code and as described in Mitigation Measure L-10 below. Compliance with these regulations, which could include the installation of a sub-slab membrane, perforated vent piping, an active sub-slab ventilation system, or methane monitoring devices, or mandate a minimum number of fresh air exchanges per hour, would assure that methane concentrations would be below the level that would present a risk to human health and safety. Thus, potential methane impacts during operation of the Project would be reduced to a less than significant level.

As noted above, the EDR report identified the presence of one abandoned oil well beneath the “Blue” parking zone of the West Hall. The oil well was developed by Chevron U.S.A., Inc. and is reportedly plugged. To the extent that Proposed Project construction occurs in proximity to this well, DOGGR may require the re-abandonment of this well in accordance with current regulatory requirements. Through this process, any potential significant impacts would be reduced to a less than significant level.

(9) Emergency Response

Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. Local streets adjacent to the Project Site would be used for construction traffic; however, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of construction traffic management plans and access standards would reduce the potential for the impacts on emergency response during construction of the Proposed Project. Therefore, construction of the Proposed Project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency’s emergency evacuation plan. Therefore, no significant impact regarding emergency response during construction of the Proposed Project is anticipated.

The Proposed Project includes the widening of sidewalks to accommodate pedestrian travel and would impact the streets immediately adjacent to the Project Site such as Pico Boulevard, L.A. Live Way, and Chick Hearn Court. However, Proposed Project development would not alter the basic layout of the local street system and would generally maintain the operational parameters that occur under existing conditions. In addition, the Project Site’s existing emergency response and/or evacuation plan would be updated to include the Proposed Project thereby reducing the potential for impact on emergency response during operation of the Proposed Project. Furthermore, as described in Section IV.B.1, Transportation, of this Draft EIR, while certain streets may be closed at certain times before, during, or after an event, these closures would continue to allow for local and emergency vehicle access. Access by such vehicles would actually be facilitated by the proposed street closures requiring use of traffic control officers at key intersections. Additionally, the Transportation Management Plan will address emergency vehicle provisions. Therefore, operation of the Proposed Project would not affect emergency response to the Project Site or the surrounding area. As such, a less than significant impact is anticipated.

4. Cumulative Impacts

Development of the Proposed Project in combination with the related projects has the potential to increase the risk for an accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, asbestos-containing materials, lead-based paint, polychlorinated biphenyls, and oil and gas would be required to comply with all applicable local, state, and federal laws, rules and regulations. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, cumulative impacts would be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

The following are the existing plans, programs and policies that address potential impacts from Proposed Project implementation due to the use, storage, and creation of hazardous materials:

Project Design Feature L-1: The Applicants shall prepare and implement a Soil Management Plan approved by the Department of Toxic Substances Control, pursuant to Department of Toxic Substances Control's Voluntary Cleanup Program, or other applicable state or local regulatory agency providing oversight, to address potential contamination in soil within the Project Site. The approved Soil Management Plan shall include procedures for soil sampling and remedial options that may include removal (excavation), treatment (*in-situ* or *ex-situ*), or other measures, as appropriate. If soil contamination is suspected to be present, prior to excavation and grading, the South Coast Air Quality Management District's (SCAQMD) Rule 1166 shall be implemented, as appropriate. If soil contamination is not suspected, but is observed (i.e., by sight, smell, visual, etc.) during excavation and grading activities, excavation and grading shall be temporarily halted and redirected around the observed area(s) until the appropriate evaluation and follow-up measures are implemented, as contained in SCAQMD's Rule 1166. The contaminated soil discovered shall then be evaluated and managed in accordance with the approved Soil Management Plan in order for grading activities to resume.

Project Design Feature L-2: A comprehensive asbestos-containing materials survey shall be conducted on all structures prior to renovation or demolition. If any Regulated Asbestos-Containing Materials (RACM), Category I/Class I Non-Friable and Category I/Class II Non-Friable ACMs that may become friable are determined to be present, they shall be removed prior to renovation or demolition activities taking into account the following: EPA's National Emission Standards for Hazardous Air Pollutants (NESHAPs) and South Coast Air Quality Management District's Rule EPA's NESHAPs 1403. EPA Guidance Document 340/1-92-013 "A Guide to Normal Demolition Practices under the Asbestos NESHAPs" shall be referred to prior to initiation of a proposed demolition project. In addition to asbestos regulations that control the release of asbestos to the ambient environment, federal and State OSHA regulations outlining specific work practices for handling ACMs shall be followed.

All asbestos removal shall be performed by an experienced, state-licensed, Cal/OSHA- and SCAQMD-registered asbestos contractor. All work shall take place under the guidance of an independent, California Certified Asbestos Consultant. The Consultant shall be responsible for reviewing the redevelopment drawings, designing engineering controls used to control airborne asbestos contamination, visual inspections of engineering controls, and ambient air monitoring to determine airborne fiber levels.

Project Design Feature L-3: A comprehensive lead-based paint survey shall be conducted on all structures prior to renovation or demolition. In the event that lead-based paint is present, all removal activities shall conform to federal and California OSHAs regulations (e.g., Interim Final Rule found in 29 CFR Part 1926.62).

Project Design Feature L-4: The Applicants shall submit to the City Fire Department and City Department of Building and Safety, as applicable, an updated emergency response and/or evacuation plan, as appropriate, to include operation of the Proposed Project. The emergency response plan shall include but not be limited to the following: mapping of evacuation routes for vehicles and pedestrians, and the location of the nearest hospital and fire departments. The update to this plan shall be coordinated with the Proposed Project's Construction Traffic and Management Control Plan (see Mitigation Measure B.1-30, Section IV.B.1, Transportation).

In addition to the above project design features, the Proposed Project shall implement the following mitigation measures.

b. Mitigation Measures

Compliance with all applicable laws, rules, and regulations associated with hazardous materials management during design, construction and operation would minimize impacts to human health and the environment. In addition, the following mitigation measures would further minimize potential hazardous materials impacts during construction:

Mitigation Measure L-1: A Geophysical Survey of the West Hall, Cherry Street Garage, and the surface parking lot located south of Pico Boulevard, between L.A. Live Way and Bond Street shall be conducted to assess the presence of undocumented USTs, or other subsurface impoundments, in these locations. A subsurface soil investigation and soil gas survey shall also be conducted in order to investigate the presence of residual contaminants in the soil in these areas. The data from the investigation shall be included in a Soil Management Plan for the Project Site, which shall indicate the proper characterization, removal, and disposal requirements for contaminated soils identified, and shall be submitted to the Department of Toxic Substances Control for approval prior to the redevelopment of the Project Site.

Mitigation Measure L-2: In the event that USTs, fill materials or undocumented areas of contamination are encountered during construction or redevelopment activities, work in the affected areas shall be discontinued until appropriate health and safety procedures are implemented. The LAFD shall be notified regarding the contamination. The appropriate program shall be selected based on the nature of the contamination identified. The contamination remediation activities shall be conducted in accordance with pertinent regulatory guidelines, under the oversight of the appropriate regulatory agency. If contaminated soil is to remain in place, it shall be evaluated for vapor intrusion concerns and if vapor intrusion issues are present, all overlying structures shall be designed to mitigate the vapor intrusion risk.

Mitigation Measure L-3: All USTs and ASTs shall be removed following all applicable local, state and federal regulations. Applicable permits shall be obtained from local oversight agencies including the City of Los Angeles Fire Department and South Coast Air Quality Management District, as applicable. An experienced environmental professional, along with LAFD representatives, shall provide oversight and monitoring of the removal and soil collection process during the tank removal. Laboratory testing of the soil shall be performed to evaluate the presence of contamination. Once a site has been initially evaluated via soil and/or groundwater collection

and analysis, further site investigation and remediation activities may be warranted. Where indicated as required by this further investigation, clean-up measures to mitigate the soil contamination, vapor intrusion risk, and/or groundwater contamination shall be undertaken. Local oversight by the City of Los Angeles Fire Department and/or Regional Water Quality Control Board is required. An environmental professional (i.e., Professional Geologist) is required to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan shall be developed by a Professional Geologist and submitted to local agencies, as required. Once approved, the remedial plan shall be implemented. Environmental closure shall be granted prior to construction, if practical. If environmental closure is not granted prior to commencement of construction of structures, then appropriate steps shall be implemented that allow for later assessment, remediation, and prevention of vapor intrusion. The environmental regulatory oversight agency shall approve the appropriate steps that are being proposed to allow for the later assessment, remediation, and prevention of vapor intrusion.

Mitigation Measure L-4: Prior to any construction activities beneath the West Hall, the California Division of Oil, Gas and Geothermal Resources and the City of Los Angeles shall be contacted regarding construction requirements associated with the former on-site oil well. If demolition or construction activities encounter remnants of, or materials associated with the former oil well, evaluation by the DOGGR and the City of Los Angeles, including possible re-abandonment in accordance with all applicable regulations shall occur.

Mitigation Measure L-5: Soil sampling at the northwestern corner of L.A. Live Way and Pico Boulevard and verification of the former 2,000-gallon gasoline UST closure/remediation status with the Convention Center and LAFD shall be conducted prior to any soil disturbance in this area. This former UST shall be closed to current regulatory standards, in accordance with all LAFD regulations.

Mitigation Measure L-6: Regularly scheduled pumping and maintenance of all on-site clarifiers and interceptors shall continue as long as they remain in use on-site. Interceptors/clarifiers to be removed shall comply with local sanitation district and/or environmental health permitting, which may include inspection and/or sample collection. Applicable permits shall be obtained from local oversight agencies including the City of Los Angeles Sanitation District and City of Los Angeles Building and Safety Department, as applicable. An experienced environmental professional shall provide oversight and monitoring of the removal and soil collection process during the removal. Laboratory testing of the soil shall be performed to

evaluate the presence of contamination. Where indicated as required by this further investigation, clean-up measures to mitigate the soil contamination shall be undertaken. An environmental professional (i.e. Professional Geologist) shall be required to provide oversight and monitoring to ensure the health and safety of all workers. A remedial plan shall be developed by a Professional Geologist and submitted to local agencies, as required.

Mitigation Measure L-7: Universal, electronic, and radioactive wastes shall be removed prior to demolition activities and set aside for re-use or disposal/recycling by a licensed recycler or specific licensee. Light tubes, lamps, or monitors shall be re-used on-site or recycled at a licensed universal/electronic/radioactive waste facility. Recycling facilities shall be authorized by the Cal-EPA—Department of Toxic Substances Control or the state in which they are located. Bill(s) of lading shall accompany each load of universal, electronic, or radioactive, waste that leaves the site, including the name and address of the generator, contractor, pick-up site, disposal site, and quantity of universal waste disposed. The recycler shall provide a statement certifying recycling/disposal/destruction of the identified wastes, including the date(s) of recycling/disposal/destruction, and identifying the disposal/destruction process used.

Mitigation Measure L-8: Electrical transformers, hydraulic elevator equipment, light ballasts, and other equipment suspected to contain PCBs shall be inspected for the presence of PCBs prior to any disturbance or removal. All equipment found to contain PCBs shall be removed and disposed in accordance with all applicable local, state and federal regulations including, but not limited to CCR Title 22 and EPA 40 CFR. In addition, a thorough assessment of any stained areas for the potential impact of PCBs and/or hydraulic oil are recommended. If impacted soil is identified, it should be properly characterized, removed and disposed of by a licensed hazardous materials contractor.

Mitigation Measure L-9: During subsurface excavation activities, including borings, trenching, and grading, Cal-OSHA worker safety measures shall be implemented as required to preclude an exposure to unsafe levels of soil gases, including but not limited to methane.

Mitigation Measure L-10: Site testing of subsurface geological formations shall be conducted in accordance with the City's Methane Mitigation Standards. The site testing shall be conducted under the supervision of a licensed Architect or registered Engineer or Geologist, and shall be performed by a testing agency approved by the Los Angeles Department of Building and Safety. The licensed Architect, registered Engineer or Geologist, shall indicate in a report to the Los Angeles Department of Building and Safety the testing procedure,

the testing instruments used to measure the concentration and pressure of the methane gas. The measurements of the concentration and pressure of the methane gas shall be used to determine the Design Methane Concentration (i.e., the highest concentration of methane gas found during site testing) and the Design Methane Pressure (i.e., the highest pressure of methane gas found during site testing). The Design Methane Concentration and the Design Methane Pressure shall determine the Site Design Level which shall be required within the proposed site buildings.

Mitigation Measure L-11: Projects that disturb more than one acre shall adhere to the requirements of the General Construction Permit issued by the Regional Water Quality Control Board. One of the requirements of the permit is the implementation of a storm water pollution prevention plan, which includes measures to prevent the accidental release of hazardous materials used during construction. Any storage or use of hazardous materials related to the fueling and maintenance of construction equipment would require a Hazardous Materials Business Plan with the LAFD, and compliance with local, state and federal regulations regarding the handling of hazardous materials. All development and redevelopment shall require the use of construction Best Management Practices to control handling of hazardous materials during construction to minimize the potential negative effects from accidental release to groundwater, stormwater runoff, and soils.

Mitigation Measure L-12: Prior to the start of construction, a hazardous materials expert shall train designated construction personnel in the visual identification of hazardous materials that may be uncovered during excavation activities at the Project Site. In the event that hazardous materials are identified during the course of site excavation, all excavation activities shall cease in the immediate area of the potential contamination and a hazardous materials expert shall be called to the site to properly assess and develop recommendations, in accordance with all applicable regulatory requirements, regarding the proper handling and disposal of any hazardous materials that may be uncovered. Once the hazardous materials are appropriately handled, the hazardous materials expert shall determine when construction in the affected area can resume.

6. Level of Significance After Mitigation

With implementation of the proposed mitigation measures, Proposed Project impacts would be less than significant.