

4.8 HAZARDS AND HAZARDOUS MATERIALS

4.8.1 INTRODUCTION

This section of the Draft EIR describes and evaluates potential impacts related to hazards and hazardous materials that could result from construction and operation of the proposed Project. The section contains: (1) a description of the existing land uses within the footprint of the proposed Project and surrounding areas as they pertain to hazardous materials use, as well as a description of the Adjusted Baseline Environmental Setting; (2) a summary of the federal, State, and local regulations related to hazards or hazardous materials; and (3) an analysis of the potential impacts related to hazards and hazardous materials associated with the implementation of the proposed Project, as well as identification of potentially feasible measures that could mitigate significant impacts.

Information from the following preliminary hazard investigations conducted for the proposed Project were used in part to prepare this section:

- *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018 (included in **Appendix 4.8.1** of this Draft EIR),
- *Hazards and Hazardous Materials*, Geosyntec, July 3, 2018 (included in **Appendix 4.8.2** of this Draft EIR), and
- EDR Radius Map Report (included in **Appendix 4.8.3** of this Draft EIR).

Prior to the preparation of this Draft EIR, a Revised Initial Study (included in **Appendix 2.0.2** of this Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form to assess potential environmental impacts associated with hazardous materials. For three of the CEQA Environmental Checklist Form thresholds related to this topic area, the Revised Initial Study found that the proposed Project would result in “no impact,” and for four thresholds were found to have “less than significant impacts.” However, one threshold, outlined in *Section 4.8.5: Thresholds of Significance* below, was reviewed further and included in this section on the Draft EIR.

The following impacts are considered to be less than significant:

- Potential impacts related to the routine transport, use, or disposal of hazardous materials were evaluated and determined to have a “Less than Significant Impact” in the Initial Study. As discussed therein, construction and operation of the proposed Project would comply with existing federal, State, and local regulations and routine precautions would reduce the potential for accidental releases of a hazardous material or substance to occur and would minimize the impact of an accident should one occur. As such, the proposed Project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and substances. Therefore, this issue is not addressed any further within this section.

- Potential impacts related to the emittance of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school were evaluated and determined to have a “Less than Significant Impact” in the Initial Study. As discussed therein, although the proposed Project is within a quarter mile of several existing schools, including Kelso Elementary School, and hazardous materials have the potential to be transported and therefore emitted near these locations, impacts would be less than significant. No new emittances of hazardous materials would occur during proposed Project construction or operation. As discussed below, the proposed Project would comply with the Hazardous Materials portion of the Construction Commitment Plan. The routes used for material transport will be along designated truck routes in the City of Inglewood (City), including Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard. These routes have been identified by the City as “Designated Truck Routes” in the Inglewood Municipal Code;¹ as such, use of these routes by the proposed project will limit impacts on adjacent uses. Further, the proposed Project will restrict haul route traffic to after hours from 10 PM to 7 AM when classes are not in session and students, staff, and faculty are not present. All activities associated with the proposed Project would comply with existing regulations governing the storage and handling of such chemicals as they relate to hazardous materials. Even though potential impacts were determined to have a less than significant impact, notices were sent to the four schools within the vicinity of the proposed Project and responses were integrated into the discussion below. Therefore, this issue is not addressed any further within this section.²
- Potential impacts related to being located within an airport land use plan, or within two miles of a public airport, public use airport, or private airstrip, resulting in a safety hazard for people residing or working in the area were evaluated and determined to have “No Impact” in the Initial Study. Los Angeles International Airport (LAX) is located more than 2 miles southwest and Hawthorne Municipal Airport is located approximately 2.75 miles southeast of the proposed Project. The proposed Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. Therefore, this issue is not addressed any further within this section.³
- Potential impacts related to the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fire were evaluated and determined to have “No Impact” in the Initial Study. The City is highly developed and entirely urbanized and is without an urban/wildland interface. The proposed Project is not within a Moderate, High, or Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection (CAL FIRE). Therefore, this issue is not addressed any further within this section.⁴

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental**

1 Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

2 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.

3 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.

4 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.

Considerations.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.8.2 METHODOLOGY

In the analysis contained in this Draft EIR, hazardous materials refer generally to hazardous substances, hazardous waste, and other materials that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products, etc.). Hazardous materials can include petroleum products, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial and industrial uses, retail businesses, hospitals, and households. Accidental releases of hazardous materials can result from a variety of incidents, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The term “hazardous materials” as used in this section includes all materials defined in the California Health and Safety Code as follows:

A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. ‘Hazardous materials’ include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

The term includes chemicals regulated by the United States Department of Transportation (USDOT), the United States Environmental Protection Agency (USEPA), the California Department of Toxic Substances Control (DTSC), the California Governor’s Office of Emergency Services, and other agencies as hazardous materials, wastes, or substances.

Analysis in this section is focused on the use or management of hazardous or potentially hazardous materials resulting from construction and operational activities envisioned under the proposed Project. The severity of potential hazards to people, property, and the environment associated with the heightened interaction with hazardous materials associated with implementation of the proposed Project is also analyzed. Analysis in this section would utilize various existing databases and historical data, including California Hazardous Material Incident Report System (CHMIRS), HAZNET, HIST CORTESE, and Los Angeles County Industrial Waste and Underground Storage Tank Sites. Contaminated site locations extracted from

these databases are then delineated on the proposed Project guideway, station, MSF and TPSS locations and impacts are assessed according to the potential activities that would take place on specific sites.

Additionally, this section addresses short-term construction impacts resulting from demolition of underground storage tanks (USTs) and other existing (typically older) structures, work in the vicinity of historical oil well and pipeline activity, work in areas with previously documented soil contamination, and other subsurface construction activities, as well as operational impacts associated with the type of uses proposed and the materials that operation of these uses would entail. In determining the level of significance, the analysis recognizes that all components of the proposed Project would be required to comply with relevant federal and State laws and regulations that are designed to ensure the safety of routine transport, use, management, or disposal of hazardous materials.

4.8.3 REGULATORY FRAMEWORK

The following presents the federal, State, and local regulatory framework, laws, ordinances, and regulations governing the proposed Project as related to hazards and hazardous materials (HHM).

4.8.3.1 Federal

Occupational Safety and Health Act

The Occupational Safety and Health Act (OSHA) is intended to create a safe workplace.⁵ OSHA establishes procedures and standards for the safe handling and storage of hazardous chemicals. In addition, a safety data sheet (SDS) containing specified information must be provided to customers, making them aware of chemical hazards to which they may be exposed. OSHA also establishes standards regarding the safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulation for Construction⁶ contains Compliance Guidelines for construction activities, which include occupational health and environmental controls to protect worker health and safety. These Guidelines articulate the required health and safety plan(s) to be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Emergency Planning and Community Right-to-Know

The Emergency Planning and Community Right-to-Know Act (EPCRA)⁷ requires facilities that store or use hazardous chemicals to submit a specified plan with copies of SDSs to the State Emergency Response Center (SERC) and the local emergency planning center (LEPC). Additionally, facilities must submit an

5 29 USC Section 651 et seq. (1970), 29 CFR Section 1910 et seq. (1999).

6 29 CFR Section 1926.65 Appendix C – Compliance Guidelines (1993).

7 42 USC Section 116 et seq. (2010), 40 CFR Section 350 et seq. (2011).

annual inventory list with details on the amount, location, and storage method of regulated chemicals present at the facility.⁸

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) enables USEPA to track industrial chemicals produced or imported into the United States.⁹ USEPA screens the chemicals and can require testing to determine if any pose an environmental or human-health hazard. Any chemical that poses an unreasonable risk then can be regulated or banned from manufacturing or importation. Congress enacted major amendments to TSCA in 2016 via the Lautenberg Act,¹⁰ which strengthened USEPA's authority to regulate chemicals.

Clean Air Act

Section 112 of the Clean Air Act requires USEPA to set air toxics standards for regulating the emissions of hazardous air pollutants.¹¹ The 1990 federal Clean Air Act Amendments establish a program designed to prevent the release of highly hazardous chemicals.¹²

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) Subtitle¹³ establishes design, construction, and operational standards to prevent chemical releases from USTs. RCRA Subtitle I regulates USTs containing hazardous substances or petroleum. USEPA sets standards governing tank construction based on whether the tank is new or whether an existing tank is upgraded. USEPA also imposes operation and maintenance procedures for UST owners and operators and establishes reporting requirements from regulated tanks that release substances into the environment.

RCRA Subtitle C¹⁴ is intended to proactively manage hazardous waste and to minimize and avoid hazardous waste contamination. RCRA Subtitle C addresses hazardous waste from cradle-to-grave, regulating the generation, transport, storage, treatment, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). RCRA, Subtitle I, the Hazardous and Solid Waste Amendments (HSWA) of 1984, expanded and clarified RCRA Subtitle C. USEPA administers RCRA Subtitle C pursuant to regulations found at 40 CFR Section 260 et seq. and has delegated RCRA Subtitle C implementation and enforcement within California to the State. Under RCRA regulations, hazardous

8 40 CFR Section 370.20 et seq. (2002).

9 15 USC Section 2601 et seq. (1976), 40 CFR Section 700 et seq. (2012).

10 H.R. 2576 — 116th Congress, "Federal Government Advertising Equity Accountability Act," (2016).

11 Clean Air Act Title I, Section 112, USC 7412 "Hazardous Air Pollutants."

12 EPA, "The Clean Air Act – Highlights of the 1990 Amendments," United States Environmental Protection Agency, accessed June 22, 2020, <https://www.epa.gov/clean-air-act-overview/clean-air-act-highlights-1990-amendments>.

13 42 USC Section 6991 et seq., (1976), 40 CFR Section 280 et seq., (2014).

14 42 USC Section 6901 et seq.

wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number.

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act regulates transport of hazardous materials on water, rail, highways, airplanes, and pipelines.¹⁵ The US Department of Transportation (DOT) administers the Act.¹⁶ Title 49 of the CFR specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements. In addition, vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. Transporters of hazardous wastes must be permitted and have an identification number.

4.8.3.2 State

Department of Toxic Substances Control

At the State level, authority for the Statewide administration and enforcement of RCRA is enforced through CalEPA's DTSC. While the DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers Statewide hazardous waste reduction programs.¹⁷ DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

Division of Occupational Safety and Health

The California OSHA (Cal-OSHA) program is administered and enforced by the Division of Occupational Safety and Health (DOSH). The Cal-OSHA program is similar to the Federal OSHA program in that both programs contain rules and procedures related to exposure to hazardous materials during demolition and

15 49 USC Section 1801 et seq., (1975).

16 49 CFR Section 100 et seq., (2016).

17 22 CCR Division 4.5, "Environmental Health Standards for the Management of Hazardous Waste," 2020, [https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=(sc.Default)).

construction activities. In addition, Cal-OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.¹⁸

California Highway Patrol and Department of Transportation

The California Highway Patrol and California Department of Transportation (Caltrans) are the enforcement agencies responsible for hazardous materials transportation regulations. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations.¹⁹ The provisions of this section apply to the highway transportation of hazardous materials and hazardous waste and include restrictions on labeling/placards, transportation routes, and other measures to ensure safe transport of regulated materials.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law²⁰ was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

- Included definitions of what was a waste and what was hazardous as well as what was necessary for appropriate handling, processing, and disposal of hazardous and extremely hazardous waste in a manner that would protect the public, livestock, and wildlife from hazards to health and safety.
- The early regulations also established a tracking system for the handling and transportation of hazardous waste from the point of waste generation to the point of ultimate disposition, as well as a system of fees to cover the costs of operating the hazardous waste management program.
- Advancing the newly developing awareness of hazardous waste management issues, the program established a technical reference center, for public and private use, dealing with all aspects of hazardous waste management.

California Government Code Section 65962.5 (a), Cortese List

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with the CEQA requirements in providing information about the

18 California Code of Regulations, Title 8 Section 3203, "Injury and Illness Prevention Program," 2020, <https://www.dir.ca.gov/title8/3203.html>.

19 California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309

20 Hazardous Waste Control Law, California Health and Safety Code sections 25100 et seq

location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop at least annually an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.²¹

CEQA²² requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any alternatives are identified on any of the following lists:

- **EPA NPL:** USEPA's National Priorities List includes all sites under USEPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA CERCLIS and Archived Sites:** USEPA's Comprehensive Environmental Response, Compensation, and Liability Information System includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.
- **EPA RCRIS (RCRA Info):** The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List:** DTSC maintains the Cortese list as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet:** DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS:** Through the Leaking Underground Storage Tank Information System, the SWRCB maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List," named after Dominic L. Cortese, the California State Assemblyman who authored the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that are no longer being implemented and, in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese Lists are now referred directly to the appropriate information resources contained on internet websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor database and the SWRCB's online GeoTracker database.

21 California Public Resources Code Section 65962.5

22 California Public Resources Code Section 21092.6.

Sites that are no longer considered “active” because the SWRCB, a regional board, or the County has determined that no further action is required because actions were taken to adequately remediate the release, or because the release was minor, presents no environmental risk, and no remedial action is necessary, are listed as “closed” and deleted from the list.²³

Hazardous Materials Business Plan

Any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map, which details their location; (2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility. HMBPs are submitted to the Department of Environmental Health Hazardous Materials Division. The plans must be resubmitted, reviewed, revised, or amended as necessary every 3 years. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure compliance with existing laws and regulations concerning HMBP requirements, (2) identify existing safety hazards that could cause or contribute to an accidental spill or release, and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.²⁴

Risk Management Plan

Any owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance is required to prepare a risk management plan. The State statutes and regulations combine federal- and State-program requirements for the prevention of accidental releases of listed substances into the atmosphere: the CalARP program. CalARP requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. Typical facilities or businesses that are required to prepare risk management plans include: ammonia refrigeration

23 California Environmental Protection Agency, Cortese List: Section 65962.5(c), accessed March 2019, available at <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/>.

24 California Health and Safety Code Sections 25500–25520.

facilities, water treatment and wastewater treatment plants that handle chlorine gas and facilities that store flammable chemicals such as methane and propane.²⁵

Titles 14, 22, 23, and 27 of the California Code of Regulations (CCR)

Title 14 requires that gas storage fields be closely monitored by facility operators to ensure their safe operation and to establish that no damage to health, property, or natural resources occurs.²⁶ Titles 22 and 23 of the CCR address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes including universal wastes.²⁷ Title 23 addresses public health and safety issues related to hazardous materials and wastes, and specifies disposal options.²⁸ Title 27 of the CCR addresses landfill closure standards and landfill-related public health and safety issues.²⁹

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In 1996, CalEPA adopted the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates and coordinates the six State programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The County of Los Angeles Fire Department Health and Hazardous Materials Division provides the regulatory oversight for federal, State, and local laws and regulations related to hazardous materials use and disposal within the City. This County agency protects the public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. In addition, the County Fire Department Health and Hazardous Materials Division (HHMD) implements the following programs that are relevant to existing and the new uses that are associated with the proposed Project:³⁰

- Hazardous Materials Reporting and Response Planning (Hazardous Materials Disclosure)
- Uniform Fire Code Business Plan
- Hazardous Waste Generation and On-site Treatment
- Accidental Release Prevention Program

25 California Health and Safety Code Sections 25531–25543.3.

26 California Code of Regulations, Title 14, “Natural Resources.”

27 California Code of Regulations, Title 22, “Social Security.”

28 California Code of Regulations, Title 23, “Waters.”

29 California Code of Regulations, Title 27, “Environmental Protection.”

30 California Senate Bill 1082.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or “Chisels”)³¹ are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

Senate Bill 1889, Accidental Release Prevention Law/CalARP

Senate Bill (SB) 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities that contain specified hazardous materials, known as “regulated substances,” which if involved in an accidental release could result in adverse off-site consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.³²

California Emergency Services Act

The California Emergency Services Act³³ was adopted to establish the State’s roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the State. This act is intended to protect health and safety by preserving the lives and property of the people of the State.

State Fire Regulations

State fire regulations include those concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State

31 Health and Safety Code Section 57008.

32 Health and Safety Code Sections 25531 – 25534.3.

33 California Public Resources Code Section 8550 – 8669.7.

fire marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.³⁴

California Fire Code (Chapter 33, Fire Safety During Construction and Demolition)

The California Fire Code, Chapter 33 related to fire safety during construction and demolition prescribes safeguards to provide reasonable safety to life and property from fire during such operations. Specific safeguards related to oil-fired heaters, gas heaters, refueling, smoking, waste disposal, welding, electrical, flammable, and combustible odors, water supply for fire protection, fire extinguishers, etc. Implementation of these safeguards are designed to reduce the potential of fire-related hazards during construction and demolition activities.³⁵

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) operates under the authority of CalEPA, with a mission to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations. There are nine regional water quality control boards (RWQCBs) that develop and enforce water quality objectives and implementation plans that will best protect the beneficial uses of the State's waters. The RWQCBs develop "basin plans" for their hydrologic areas, govern requirements/issue waste discharge permits, take enforcement action against violators, and monitor water quality. The RWQCBs have the authority to require the remediation of sites where groundwater quality may be degraded by hazardous materials or substances releases from USTs or other sources. The proposed Project is within the jurisdiction of the Los Angeles RWQCB (Region 4). The Los Angeles RWQCB issued Order No. R4-2007-0019 which provides General Waste Discharge Requirements (WDRs) relative to the groundwater remediation at petroleum hydrocarbon fuel and/or volatile organic compound (VOC) impacted sites. The Order identifies a list of materials that can be used for in-situ remediation zone treatment purposes.³⁶

The State Water Board adopted a Low-Threat Underground Storage Tank Case Closure Policy.³⁷ The Policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. The Policy establishes both general and media-specific criteria.

34 California Health and Safety Code Section 13000 et seq.

35 California Fire Code 2019.

36 LARWQCB Basin Plan, March 13, 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/.

Both Regional Water Boards and local agencies have been directed to review all cases in the petroleum UST Cleanup Program using the framework provided in the Policy. This review shall be accomplished within existing budgets and be performed no later than 365 days from the effective date of this Policy.

These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in the Policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this Policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site

If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety, and the environment. The Policy recognizes, however, that even if all of the specified criteria in the Policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the Policy inappropriate.

4.8.3.3 Regional and Local

South Coast Air Quality Management District

Remediation of contamination has the potential to expose workers to hazardous materials or substances. The South Coast Air Quality Management District (SCAQMD) regulates emissions from soil remediation activities through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. This rule requires development and approval of a mitigation plan, monitoring of VOC concentrations, and implementation of the mitigation plan if VOC-contaminated soil is detected.³⁸

SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM).³⁹

38 Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, AQMD, 2001, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

39 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

Regional Water Quality Control Board

USTs are regulated under Subtitle I of RCRA and its implementing regulations, which establish construction standards for new UST installations, as well as standards for upgrading existing USTs and associated piping. After 1998, all nonconforming tanks were required to be either upgraded or closed.

The storage of hazardous materials in USTs is regulated by CalEPA's SWRCB, which has delegated authority to each of the nine RWQCBs and, typically on the local level, to the local fire department. The State's UST Program regulations include, among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. The State's Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of unauthorized discharges of pollutants and pollution-impaired sites not overseen by the UST Program.⁴⁰ The primary goal of the SCP is to direct and provide oversight of site investigation and cleanup activities that will result in restoration and/or protection of water quality, human health, and the environment.

The LACoFD administers and enforces federal and State laws and local ordinances for USTs in the City of Inglewood. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

County of Los Angeles Fire Department

At the local level, the County of Los Angeles Fire Department (LACoFD) monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials are required to file an Accidental Risk Prevention Program with the LACoFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LACoFD also has delegated authority to administer and enforce Federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.⁴¹

City of Inglewood General Plan

The City's General Plan, Safety Element outlines the following relevant measures as means to minimize the dangerous aspects of hazardous materials:⁴²

40 42 USC Section 6901 et seq.

41 California Health and Safety Code, Chapter 6.95.

42 *City of Inglewood General Plan, "Safety Element" (1995).*

- Enforcement of the State law that requires businesses involved with hazardous materials to disclose the quantities of hazardous materials, their locations, their disposal, and a management plan designed to decrease risks to the public.
- Private businesses and government agencies must continue to update and prepare the proper emergency responses in the event of a spill or explosion.
- The City must have continuous coordination among its staff to ensure that hazardous material operations are located in zones and facilities that are appropriate and safe for such use.
- The City must ensure that these uses are located safe distances from residences, schools, hospitals, large assemblages of people, etc.
- The City must inform the public of the potential perils that accompany hazardous material sites. Public awareness as acquired through public education programs will enable the citizenry to learn to protect themselves by observing and implementing safety procedures during a spill or explosion.

The City's General Plan, Safety Element identifies evacuation routes that assume worst-case displacement and surface rupture from a seismic event. Within the City, Florence Avenue, La Brea Avenue, Crenshaw Boulevard, and Imperial Highway are identified as designated evacuation routes. In addition, the Safety Element of the General Plan identifies emergency corridors that can be most readily opened immediately following a seismic event. These include Inglewood Avenue, La Brea Avenue/Hawthorne Boulevard, Prairie Avenue, Crenshaw Boulevard, La Cienega Boulevard, Van Ness Avenue, West Boulevard, Florence Avenue, Manchester Boulevard, Century Boulevard, Imperial Highway and Centinela Avenue.

City of Inglewood Multi-Hazard Mitigation Plan and Emergency Operation Plan

The City Multi-Hazard Mitigation Plan was developed by the City to reduce or eliminate long-term risk to human life and property both natural and man-made hazards.⁴³ The plan includes a list of mitigation measures to be implemented in order to meet identified goals and objectives related to emergency readiness and hazard reduction. In addition, the City prepared an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan includes information on the Emergency Operations Organization, the roles, and responsibilities of each City division, and includes operational checklists to guide response actions. The City's Multi-Hazard Mitigation plan was adopted on August 18, 2009 with a 5-year planning horizon. The City is currently undergoing the development of a revised and updated plan subject to the securing of funding.

The City's Office of Emergency Services (OES) acts in coordination with all City departments to maximize the City's potential to prevent, prepare for, respond to, and recover from both natural and man-made

43 *City of Inglewood*, Multi-Hazard Mitigation Plan, March 23, 2010.

emergencies and disasters. The 2010 MHMP generally provides a means to prepare and maintain systems, supplies and other logistical items to support emergency/disaster response and recovery among City departments. According to the MHMP, “all future development/redevelopment projects will be constructed to current design standards and building codes and are not expected contribute to community vulnerability from natural or technological hazards.”⁴⁴ The overall goals of the plan are to:

- Minimize the loss of life and property from natural hazard events
- Protect public health and safety
- Increase public awareness of risk from natural hazards
- Enhance emergency services including warning systems

City of Inglewood Municipal Code

The Inglewood Municipal Code adopts the Los Angeles County Fire Code as the Fire Code of the City.⁴⁵ Additionally, the Municipal Code designates the Los Angeles County Fire Department as the administering agency for the hazardous material inventory and emergency response program within the City, including the provisions of the California Hazardous Materials Release Response Plans and Inventory Law and other hazardous materials related regulations.⁴⁶ These sections of the Municipal Code set forth requirements to ensure fire safety of new and reconstructed buildings within Inglewood.

4.8.4 EXISTING CONDITIONS

4.8.4.1 Known Hazardous or Potentially Hazardous Materials

Underground Storage Tanks

Soils and groundwater in the City have the potential to be contaminated due to historical spills and leaking USTs. A UST is defined by law as “any one or combination of tanks, including pipes connected thereto, that is used for the storage of hazardous substances and that is substantially or totally beneath the surface of the ground” (certain exceptions apply).⁴⁷ There are nine known historical Leaking Underground Storage Tanks (LUSTs) within 500 feet of the proposed Project identified by the State Water Resources Control Board.⁴⁸ These locations are listed as follows and are arranged by proximity to each guideway segment:

44 City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010.

45 Inglewood Municipal Code, “Chapter 6, Article 1: Fire Code and Amendments,” <https://www.qcode.us/codes/inglewood/view.php?topic=6-1&frames=off>.

46 Inglewood Municipal Code, “Chapter 6, Article 2, Section 6-5: Hazardous Materials Disclosure Agency,” https://www.qcode.us/codes/inglewood/view.php?topic=6-2-6_5&frames=off.

47 California State Water Resources Control Board, Division of Water Quality, “Underground Storage Tank Program,” accessed March 2019, available at <https://www.waterboards.ca.gov/ust/>.

48 California State Water Resources Control Board, GeoTracker, accessed March 2019, available at <https://geotracker.waterboards.ca.gov/>.

Market Street Segment

- **317 E. Florence Avenue** (Los Angeles County Metropolitan Transportation Authority [Metro]); RWQCB Case Number R-60173 involved potential contamination of gasoline in soil; remediation completed and case closed as of January 13, 2017;
- **230 N. La Brea Avenue** (Fujita Corporation); RWQCB Case Number R-37884 involved potential contamination of gasoline; case closed as of September 10, 2003;

Manchester Boulevard Segment

- **501 E. Manchester Boulevard** (Simon's Mini Market); RWQCB Case Number I-13094 involved potential contamination of gasoline in drinking water aquifer; remediation completed and case closed as of November 1, 2006;
- **501 E. Manchester Boulevard** (Simon's Mini Market); Los Angeles County Department of Public Works case number 009805-013094; remediation completed and case closed as of January 9, 2014;
- **500 E. Manchester Boulevard** (former Sears Auto Center); RWQCB Case Number I-09429 involved potential contamination of gasoline in soil; remediation completed and case closed as of July 19, 1996;
- **3900 W. Manchester Boulevard** (the Forum); RWQCB Case Number R-09447 involved potential contamination of gasoline in soil; remediation completed and case closed as of February 23, 1998;
- **3900 W. Manchester Boulevard** (the Forum); RWQCB Case Number R-09447A involved potential contamination of gasoline, methyl tertiary-butyl ether (MTBE)/tert-Butyl alcohol (TBA)/other fuel oxygenates, and tetrachloroethylene (PCE) in drinking water aquifer; remediation completed and case closed as of July 15, 2013;

Prairie Avenue Segment

- **600 S. Prairie Avenue** (former Airport Park Hotel); RWQCB Case Number R-63615 involved potential contamination of gasoline in soil; remediation completed and case closed as of April 10, 2018; and
- **4000 W. Century Boulevard** (former Unocal #5050); RWQCB Case Number I-09966 involved potential contamination of gasoline in drinking water aquifer; remediation completed and case closed as of October 22, 1996.

All identified LUST cases have been remediated and closed at the time of this analysis. Per the California DTSC, there are no other contaminated, State agency-monitored properties in the vicinity of the proposed Project.⁴⁹

49 California Department of Toxic Substances Control, EnviroStor, accessed March 2019, available at <https://www.envirostor.dtsc.ca.gov/public/>.

Further, the SWRQCB identifies a number of permitted USTs in the vicinity of the proposed Project guideway segments, listed as follows:⁵⁰

Market Street Segment

- **317 E. Florence Avenue** (Metro) facility ID not available;
- **111 N. Locust Street** (Senior Center Site), facility ID not available;

Manchester Boulevard Segment

- **338 E. Manchester Street** (Retail Boutique), facility ID not available;
- **501 E. Manchester Boulevard** (Simon's Market), facility ID LACoFA0017385;
- **510 E. Manchester Boulevard** (Vons Fuel Center #2502), facility ID LACoFA0033888;

Prairie Avenue Segment

- **601 S. Prairie Avenue** (Miles Mini Mart), facility ID LACoFA0021214;
- **600 S. Prairie Avenue** (Pincay 60-Acre Property [Hollywood Park property]), facility ID not available;
- **1050 S. Prairie Avenue** (Hollywood Park Race Track), facility ID LACoFA0021198; and
- **4015 W. Century Boulevard** (Chevron #206907), facility ID LACoFA0007105.

Of these USTs, only one facility is located within the footprint of the proposed Project: the Vons Fuel Center #2502 at 510 E. Manchester Boulevard (facility ID LACoFA0033888) is located within the site for the proposed Maintenance and Storage Facility (MSF). As part of the demolition process of the proposed Project, this UST facility would be closed and removed from the site. The site would be remediated for any contamination in accordance with the appropriate regulatory requirements pursuant to UST closure⁵¹ and any additional regulatory requirements; closure requirements and approval would be sought from the jurisdiction having authority included the LARWQCB.⁵²

Historical Oil and Gas Extraction Activities

The City is located within the southern portion of a large oil field that includes Baldwin Hills to the northwest. The oil deposits in this oil field have been explored and actively extracted for nearly a century.⁵³ Records indicate a substantial number of abandoned, plugged, or idle oil and gas and dry hole wells in the

50 California State Water Resources Control Board, GeoTracker, accessed March 2019, available at <https://geotracker.waterboards.ca.gov/>.

51 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, <https://pw.lacounty.gov/epd/UST/closure.cfm>.

52 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, <https://pw.lacounty.gov/epd/UST/closure.cfm>.

53 City of Inglewood, General Plan Update Technical Background Report, August 2006.

City.^{54,55} The Potrero Oil Field traverses much of the northern and eastern portions of the City, including portions of the proposed Project including the Market Street Segment and Manchester Boulevard Segment of the guideway.⁵⁶ Contaminants frequently associated with oil and gas activities include crude oil, refined petroleum products, drilling mud, metals, polychlorinated biphenyls (PCBs), pesticides and volatile organic compound (VOCs) impacts in soil and soil vapor. Potential sources for these contaminants include oil wells, well cellars, pumps, pipes, sumps, storage tanks, separators, transformers, and application of petroleum products/crude oil (likely containing PCBs and pesticides) for dust/weed control. As commonly found near oil and gas fields, the subsurface conditions in the vicinity of the proposed Project may also include naturally occurring methane and hydrogen sulfide gas.⁵⁷

While the City is entirely urbanized and largely precluded from future oil exploration and drilling, a number of historical oil and gas exploration and drilling activities have occurred in the vicinity of the proposed Project. These locations are listed as follows, according to their unique American Petroleum Institute (API) well number and Project guideway segment:

Manchester Boulevard Segment

- **API 0403713694**; oil and gas well located within the Potrero Oil Field on the southeastern side of Spruce Avenue, approximately 90 southeast of the proposed MSF site across Spruce Avenue and 150 feet southwest of the Spruce Avenue and Manchester Boulevard intersection; plugged and abandoned to the satisfaction of the California Department of Natural Resources, Division of Oil and Gas (now the Department of Conservation, Division of Oil, Gas, and Geothermal Resources [DOGGR]) as of March 5, 1930;^{58,59} and

Prairie Avenue Segment

- **API 0403705654**; dry hole well located on the southern side of Nutwood Street, approximately 150 feet west of Prairie Avenue; plugged and abandoned to the satisfaction of the California Department

54 Dry hole wells are oil, water, or gas wells which are determined to not be commercially profitable.

55 California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), Well Statewide Tracking and Reporting System (WellSTAR) database, interactive map, accessed March 2019, available at <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6>.

56 California Department of Conservation, DOGGR, WellSTAR, interactive map, accessed March 2019, available at <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6>.

57 *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018.

58 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03713694, accessed March 2019, available at <https://secure.conservation.ca.gov/WellSearch/Details?api=03713694#main-content>.

59 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API #03713694, accessed March 2019, available at https://secure.conservation.ca.gov/WellRecord/037/03713694/03713694_2018-02-27_DATA.pdf.

of Natural Resources, Division of Oil and Gas (now the Department of Conservation, DOGGR) as of March 19, 1930.^{60,61}

No previously identified oil and gas or dry hole wells are located within the footprint of the proposed Project guideway, stations or parcels that will be used for support facilities.

Aged Buildings

In urbanized areas such as those in the vicinity of the proposed Project, risk from hazards and hazardous materials are associated with historical land uses involving the use of hazardous materials for building construction (lead and asbestos) or for operation for uses such as auto repair shops, medical offices, dry cleaners, and photo processing centers. Many of the existing buildings in the area were constructed from the 1920s through the 1980s. Based on their age, these older buildings may contain asbestos, lead-based paints (LBPs) and potentially toxic finishes, molds, and/or polychlorinated biphenyls (PCBs) that could be released during demolition or renovation activities. Typical hazardous materials of concern for existing older structures include the following:

- **Asbestos** is a mineral fiber that is carcinogenic and harmful to respiratory health and is considered both a hazardous air pollutant and a human health hazard. Because of its fiber strength and heat resistance, it was widely used prior to the 1980s in California in a variety of building construction materials for insulation, fire-retardation, and friction and heat-resistant products, such as ducting insulation, wallboard, shingles, ceiling tiles, floor tiles, insulation, plaster, and floor backing. Thus, buildings constructed prior to 1980 could contain asbestos-containing materials (ACM). The risk to human health is from inhalation of airborne asbestos, which commonly occurs when asbestos-containing materials are disturbed during activities such as demolition and renovation. Due to the age of the buildings within the area, it is likely that asbestos-containing materials are present.
- **Lead** is a recognized harmful environmental pollutant exposed through air, drinking water, food, soils, paint, and dust. Lead was widely used in paint, gasoline, water pipes, and many other products prior to 1977 when the U.S. Consumer Product Safety Commission banned the use of lead-based paint. Common methods of paint removal, such as sanding, scraping, and burning, create dust and the potential for lead to be absorbed into the body and pose a potential health risk. Since many of the structures located within the area were built prior to the federal regulations banning the use of lead-based paints (LDP), it is likely to exist in structures constructed prior to 1977.
- **Polychlorinated Biphenyls (PCBs)** are synthetic chemicals that were manufactured for use in various industrial and commercial applications—including oil in electrical and hydraulic equipment, and plasticizers in paints, plastics, and rubber products—because of their nonflammability, chemical

60 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03705654, accessed March 2019, available at <https://secure.conservation.ca.gov/WellSearch/Details?api=03705654>.

61 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API # 03705654, accessed March 2019, available at https://secure.conservation.ca.gov/WellRecord/037/03705654/03705654_2018-02-09_DATA.pdf.

stability, high boiling point, and electrical insulation properties. When released into the environment, PCBs persist for many years, accumulate and concentrate in organisms. The USEPA has classified PCBs as probable human carcinogens. In 1979, USEPA banned the use of PCBs in new electrical equipment and began a program to phase out PCB-containing equipment. Thus, older industrial areas in the vicinity of the proposed Project could contain PCBs.

City of Inglewood Civic Center Site

As noted in **Section 3.0: Project Description**, the proposed Project includes the location of a Traction Power Substation (TPSS) on the City's approximately 4-acre Civic Center site on Prairie Avenue. The City's Civic Center site is located at the southeast corner of the Prairie Avenue and Arbor Vitae Street intersection and is intended to be developed and constructed by the City as an Intermodal Transportation Facility (ITF). The TPSS would be located either above grade or below grade within the footprint of the proposed ITF. The City's Civic Center site is adjacent to the Prairie Avenue Segment of the proposed Project guideway.

The 2009 EIR for the Hollywood Park Specific Plan (HPSP) project⁶² evaluated the impacts of developing the City's four-acre Civic Center site with respect to potential hazardous materials and risk of upset. As described in the 2009 EIR, the City's four-acre Civic Center site, has undergone numerous site assessment evaluations over the past two decades; those which are relevant to the proposed Project are shown in **Table 4.8-1: Civic Center Site-Specific Investigations**. A summary of the investigative history associated with the City's Civic Center site is provided below.

**Table 4.8-1
Civic Center Site-Specific Investigations**

| Investigation | Prepared By | Date |
|---|-----------------------------------|-------------------|
| Phase I Environmental Site Assessment and Limited Compliance Assessment | ENVIRON International Corporation | April 11, 2005 |
| Soil Management Plan | Erler & Kalinowski, Inc. | July 3, 2007 |
| Technical Report and Work Plan | Erler & Kalinowski, Inc. | April 24, 2008 |
| Field Portable X-Ray Fluorescence Spectrometry for In-Situ Screening of Arsenic in Soil | Erler & Kalinowski, Inc. | February 26, 2015 |

Source: City of Inglewood, Final Environmental Impact Report for the Hollywood Park Redevelopment Project, June 3, 2009.

A Soil Management Plan (SMP)⁶³ summarizing prior screening-level subsurface investigations was prepared in July 2007 and submitted and approved by the RWQCB, to address localized areas found to contain or suspected to contain chemicals of potential concern (COPCs) on the Hollywood Park property

⁶² City of Inglewood, Final Environmental Impact Report for the Hollywood Park Redevelopment Project, June 3, 2009.

⁶³ Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

including the City's Civic Center site where the proposed Project may locate a TPSS facility either above or below grade. The SMP includes soil and soil gas COPCs criteria and soil management and construction risk management protocols to be implemented during planned redevelopment of the property, including soil reuse and waste disposal classification protocols.

Soil sampling revealed arsenic in shallow soil at the City's Civic Center site on Prairie Avenue.⁶⁴ All shallow arsenic-contaminated soil has been removed from the City's Civic Center site as of the summer of 2020.⁶⁵ The remaining soil on the site is below the Property-specific Soil Criteria (PSC) requirement and removal is deemed complete; no further action is recommended. The RWQCB required no further action and is currently reviewing final closure.

Oil Wells

The City has an extensive history of oil exploration and extraction activities associated with oil fields located within City limits. As such, the City may contain previously unknown or undisclosed plugged and/or improperly abandoned oil and gas or dry hole wells. Potential hazardous materials associated with these activities include methane, hydrogen sulfide, leaking oil or gas, wells not abandoned to current standards, or other contaminants. However, no previously identified oil and gas or dry hole wells are located within the footprint of the proposed Project guideway and stations, or parcels that will be used for support facilities.

4.8.5 ADJUSTED BASELINE

For the purposes of the hazards and hazardous materials analysis, the Adjusted Baseline (described further in *Section 4.0.5*), includes projects that will be constructed immediately northeast of the intersection of West Century Boulevard and South Prairie Avenue which are expected to include the use, storage, and disposal of hazardous materials. Construction of these improvements will not likely have any direct effect on the hazards and hazardous materials associated with the proposed Project, as the improvements being constructed would be expected to have only site-specific hazard issues.

As described in the SMP for the HPSP project and the Adjusted Baseline projects, following completion of construction, none of the sites for related projects included in the Adjusted Baseline will contain contaminants of potential concern that are above the criteria set in the SMP. Remediation has or will occur during grading and site preparation activities. The regulatory oversight required for these types of remediation activities would be required prior to completion of construction and would require that no potential for off-site migration could adversely affect the proposed Project. Also, the Adjusted Baseline projects will not be associated with substantive routine emissions of hazardous materials or wastes and

64 Analytical Consulting Group, Inc., Post-Removal Soil Sampling Report, Removal of Arsenic-Contaminated Soil, May 21, 2020.

65 Analytical Consulting Group, Inc., Memorandum of Completion, Arsenic-contaminated Soil Removal, May 5, 2020.

any incidents such as accidental and upset conditions would likely be isolated and localized events. Therefore, while the amount of hazardous materials being transported, stored, handled, and disposed of with these new land uses will increase, they would not substantively alter the environmental setting beyond that existing under current existing conditions.

4.8.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of cultural resource impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant impact in relation to hazards and hazardous materials if it were to:

Threshold HAZ-1 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.

Threshold HAZ-2 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

4.8.6.1 ITC Construction Commitment Program

The proposed Project includes the ITC Construction Commitment Program (CCP) to proactively address the potential effects of the construction of the Project on the community. The CCP identifies features and actions incorporated into the Project to lessen or avoid potential impacts.

Building Demolition Plan

Prior to any demolition occurring, the contractor, will be required to conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation will be required to be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present on and to ensure ACMs and LBP are removed to levels established for public safety.

Hazardous Materials Contingency Plan

The contractor will be required prepare a plan addressing the potential for discovery of unidentified underground storage tanks (USTs), hazardous materials, petroleum hydrocarbons, or hazardous or solid wastes encountered during construction. This plan shall address UST decommissioning, field screening and materials testing methods, contaminant management requirements, and health and safety requirements to ensure no exposure to hazards or hazardous materials occurs on site and to ensure any

contaminated materials encountered during construction are removed to levels established for public safety.

Soils Management Plan

A Soils Management Plan (SMP) will be prepared after final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction and implemented during all phases of construction. The SMP will establish soil reuse criteria, establish a sampling plan for stockpiled materials, describe the disposition of materials that do not satisfy the reuse criteria, and specify guidelines for imported materials.

Disturbed soils will be monitored for visual evidence of contamination (e.g., staining or discoloration). Soil will also be monitored for the presence of VOCs using appropriate field instruments such as organic vapor measurement with photoionization detectors or flame ionization detectors in accordance with South Coast Air Quality Management District Rule 1166. If the monitoring procedures indicate the possible presence of contaminated soil, a contaminated soil contingency plan will be implemented and will include procedures for segregation, sampling, and chemical analysis of soil. Contaminated soil will be profiled for disposal and will be transported to an appropriate hazardous or non-hazardous waste or recycling facility licensed to accept and treat the type of waste indicated by the profiling process.

In addition, a contaminated soil contingency plan will be developed and in place during all construction activities. If these processes generate any contaminated groundwater that must be disposed of outside of the dewatering/National Pollutant Discharge Elimination System process, the groundwater will be profiled, manifested, hauled, and disposed of in the same manner.

Health and Safety Plan

A Health and Safety Plan will be developed to address the potential for exposure to the constituents of concern identified in the Phase II ESA.

Worksite Traffic Control Plans

The ITC CCP includes a construction staging and traffic control plan that requires the preparation of a Worksite Traffic Control Plan and review and approval of this plan prior to construction. The Worksite Traffic Control Plan will address temporary street closures and detours needed during the construction of the Project and address the following:

- Coordination with other public infrastructure projects within the City's boundaries
- Detour impact analysis for pedestrian, business, bicycle, and traffic flow

- Coordinate closures and restricted access with all special events
- Notification of the public with use of signage and web-based media
- Coordinate with City of Inglewood and LA County police and fire personnel regarding maintenance of emergency access and response times
- Monitor and coordinate deliveries
- Establish detour routes
- Work with residential and commercial neighbors regarding upcoming construction activities and
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

Except as provided in the work hours permit to be issued by the City for the Project, the full number of traffic lanes in the peak direction will be required to be maintained on arterial streets affected by construction, and if feasible one traffic lane in the off-peak direction, with additional capacity provided through appropriate detour routes. The directional traffic lanes will be reversible to maintain the peak directional capacity in either direction.

The City and the Contractor will be required to meet and confer ninety (90) days prior to the planned date of any temporary full street closure to coordinate community outreach for the closure. Detour routes during temporary street closures will be subject to review and approval by the City, provided that the Contractor gives thirty (30) days' notice. Detour routes will not be allowed to include residential streets unless authorized by the City. Advance public notification of street closures in accordance with the notification process required by the City would be provided. All Lane and street closures will be conducted in accordance with the standards set forth in the Construction Commitment Plan (CCP); all Construction Staging Plans, Traffic Management Plans, and any conditions of approval included in a City-issued permit.

4.8.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

Impact HAZ-1: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

Construction activities would involve the use of materials—including fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions—that would require special handling, transport, and disposal. These materials would be transported to and from the proposed Project for use during construction activities. The improper handling and transport of hazardous materials could result in

accidental release of hazardous materials, thereby exposing the public or the environment to hazardous materials.

As discussed in *Section 4.8.3.1*, the transport of hazardous materials is regulated by USDOT and Caltrans.⁶⁶ The transport regulations ensure safe transport of the regulated materials by addressing how hazardous materials are labeled, identifying approved transport routes, and include provisions that restrict containment during highway transportation of hazardous materials and wastes.

Use of common construction materials such as fuels, paints, cleaners, solvents, and welding materials are also expected during construction. In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination. If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved and would be cleaned up in a timely manner in accordance with identified BMPs. As such, release of hazards while handling hazardous construction materials to the public or the environment through reasonably foreseeable upset and accident conditions during construction would be less than significant.

Construction of the proposed Project would entail demolition, excavation, and grading activities which would disturb the existing physical landscape. As previously mentioned, areas near the proposed Project have been identified to contain former and current commercial operations and historic oil and gas exploration and production activities. Impacts to potentially contaminated locations are discussed in the following guideway and stations, MSF, and TPSS sites. The potential for hazards release would be assessed based on individual basis for each of these component's construction.

Construction activities would disturb more than one acre and, thus, would be required to implement requirements of the NPDES General Construction Permit. This permit requires implementation of best management practices (BMPs) that would include measures to address the safe handling of hazardous materials, and, in the unlikely event of an inadvertent release, would require spill response measures to contain any release of hazardous materials. The use of construction BMPs implemented as part of a Stormwater Pollution Prevention Plan as required by the NPDES General Construction Permit would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

⁶⁶ California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309.

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

As described above, refueling activities of heavy equipment would be conducted in a dedicated and controlled area with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects, such as the Proposed Project, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a less-than-significant impact.

As discussed in *Section 4.8.3: Regulatory Framework*, transportation of hazardous materials is regulated by US DOT and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the exposure of hazardous materials. In addition, businesses that use hazardous materials, including construction companies, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials. The City will ensure compliance with these regulations including, but not limited to, the Hazardous Waste Control Act, the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program, and the Aboveground Storage Tank Program.

Guideway and Stations

The proposed Project would involve the construction of an elevated guideway and stations primarily within the public rights-of-way along the guideway, in addition to both MSF and TPSS uses on adjacent parcels.

Construction of the guideway and stations would involve the demolition of existing buildings at the commercial center at the northeast corner of Market Street and Regent Avenue, and at 150 S. Market Street, and the retail commercial center at 500 E. Manchester Boulevard. Due to their age, some of these buildings may have the potential release hazardous materials, such as asbestos containing material, lead-based paint, and other potentially hazardous building materials in some form as part of the building materials, such as polychlorinated biphenyl (PCBs), mercury, or chlorofluorocarbons found in fluorescent

lighting and electrical switches. Given the date of construction of the buildings, it is possible that asbestos containing materials (ACMs) may be present in building materials. In addition, it is possible that lead-based paint (LBP) was historically used on facility structures. Preparation and implementation of the Building Demolition Plan required to be prepared by the ITC CCP as described above would include an evaluation of all buildings to be demolished to be evaluated to gauge levels of possible ACMs and LBP prior to any construction activities. Remediation would be completed if presence of ACMs and LBP are confirmed.

The demolition of the structures, and subsequent removal and disposal of potential hazardous materials, has the potential to release these hazardous materials into the environment and may expose members of the public in the vicinity of the demolition activities. The removal of any ACMs would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403⁶⁷ and Cal/OSHA regulations regarding LBP, ACMs, PCBs, mercury, or chlorofluorocarbons.

With implementation of the Building Demolition Plan and compliance with relevant regulations and requirements, the proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of ACMs, LBP, PCBs, mercury, or chlorofluorocarbons into the environment. SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM.⁶⁸ The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for ACWM. Under the Lead Renovation, Repair, and Painting Rule, contractors who renovate or partially demolish pre-1978 residential buildings must be lead-safe certified by USEPA and use lead-safe practices. Lead abatement activities are regulated by the USEPA; lead abatement companies are governed by the USEPA and the USEPA requires individuals and firms that conduct lead-based paint activities, including abatement, to be licensed.

Construction of the guideway and stations could involve excavation of existing soil and disturbance of soil containing hazardous materials. Excavations of soil contaminated with petroleum hydrocarbons or dry-cleaning solvents may be encountered during construction of the guideway and stations. Workers may be exposed to contaminants during grading, loading, and transportation activities during construction of the guideway and stations. As part of the ITC CCP, as described above, a Soil Management Plan and a

67 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

68 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

Hazardous Materials Business Plan will be prepared before construction begins and implemented throughout construction.

The construction of the Market Street/Florence Avenue Station would involve the demolition of existing buildings at the commercial center at the northeast corner of Market Street and Regent Avenue. Historical uses of the site comprising of addresses 200 to 270 Market Street include those of gas station, automobile repair, and dry cleaner operations. The existing CVS store site is listed as a RCRA Large Quantity Generator (LQG) that generates alkaline and acidic solutions, other inorganic solid waste, unspecified solvent mixture, pharmaceutical waste, ignitable waste, chromium, mercury, selenium, m-cresol, nicotine, 2-propanone, acetone, cyclohexane, lindane, selenium sulfide and various other organic chemicals.

As described previously in *Section 4.8.4.1: Known Hazards or Potentially Hazardous Materials*, the Market Street/Florence Avenue Station would be located near the site of two previous LUST cases (RWQCB Case Number R-60173, associated with Metro and RWQCB Case Number R-37884, associated with the Fujita Corporation) involving the potential contamination of gasoline in soil. However, remediation was completed to the satisfaction of the RWQCB and the cases closed as of January 13, 1997 and September 10, 2003, respectively.

Construction of the guideway and stations would not result in an accidental release of hazardous materials into the environment due to satisfactory remediation pursuant to the RWQCB's remediation regulations for LUSTs and USTs. Remediation regulations include installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting and/or corrective action, and enforcement. In addition, the SCP would regulate and oversee any investigation and cleanup of any sites not overseen by the UST program.⁶⁹ In addition, Hazardous Materials Contingency Plan would address UST decommissioning through its hazardous materials contingency plan implementation.

Implementation and enforcement of federal and State laws and local ordinances for USTs at within the City of Inglewood are enforced by LACoFD and plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

During guideway and station construction, use of common construction materials such as fuels, paints, cleaners, solvents, and welding materials are also expected. An accidental spill of such materials may impact the environment, on-site construction workers and possibly off-site receptors. General contractors would follow instructions available on manufacturer labels while handling hazardous materials to minimize on-site accidents and releases.

⁶⁹ 42 USC Section 6901 et seq.

Construction of the guideway and the Prairie Avenue/Pincay Drive station along Prairie Avenue would require use of limited quantities of hazardous materials, including fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. There is one existing school, Kelso School, that has been identified within 0.25 miles of the proposed Project near the guideway and Prairie Avenue/Pincay Drive station; Kelso School is operated by the Inglewood Unified School District.

Hazardous materials would be transported to and from the construction areas of the proposed Project and could pass near these schools. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials near schools, thereby exposing school occupants to hazardous materials. However, as discussed in the *Section 4.8.3: Regulatory Framework*, the transportation of hazardous materials is regulated by US DOT and Caltrans. Together, federal and State agencies establish driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. No regular transport of hazardous materials would occur during proposed Project construction or operation.

Businesses that use hazardous materials, including construction companies and associated contractors, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials in accordance with the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.), which is implemented by regulations described in CCR Title 22. Finally, construction on sites larger than one acre would be required to comply with the Construction General Permit and implement a SWPPP and its associated BMPs to control and limit any releases of hazardous materials.

A comprehensive and enforced set of laws and regulations minimize the risks associated with the transportation and management of hazardous materials, as articulated in *Section 4.8.3*. These laws and regulations would reduce potential hazards associated with construction to levels that minimize health risks.

No new emittances of hazardous materials is expected to occur during proposed Project construction. The routes used for material transport would be along designated truck routes in the City, including Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard which are City-identified "Designated Truck Routes"⁷⁰ The ITC CCP requires that detours for the general public and haul routes not include streets schools are located on wherever feasible.

70 Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

Implementation of the ITC CCP measures related to hazards and hazardous materials and construction traffic would mitigate potential impacts to less than significant.

Impacts related to release of hazards while handling hazardous construction materials to the public or the environment through reasonably foreseeable upset and accident conditions during guideway and station construction would be less than significant.

Maintenance and Storage Facility

The proposed Project would involve construction of the MSF on parcels adjacent to the guideway which would occupy an approximately 5.5-acre site located at 500 E. Manchester Boulevard developed with a retail commercial use. The site is the location of a previous LUST case (RWQCB Case Number I-09429, associated with a former Sears Auto Center) involving the potential contamination of gasoline in soil. However, remediation was completed to the satisfaction of the RWQCB and the case closed as of July 19, 1996.⁷¹

One UST facility is located at the existing Vons Fuel Center #2502 at 510 E. Manchester Boulevard (facility ID LACoFA0033888) within the proposed MSF site. This UST and removed as part of the proposed Project. As discussed above, the ITC Project Hazardous Materials Contingency Plan would address UST decommissioning should any be encountered during construction. Closure of the gas station and removal of the USTs present on this site would be subject to the requirements of the RWQCB. If any contamination in accordance with the appropriate regulatory requirements. Closure by removal of an UST, piping and/or dispensers must comply with the closure conditions as directed on the Closure Permit as well as meet the requirements of California Health and Safety Code Section 25298, *Underground Storage of Hazardous Substances*,⁷² California Code of Regulations Title 23, Sections 2670 through 2672, *Underground Storage Tank Closure Requirements*,⁷³ and the Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*.⁷⁴

Construction of the MSF would not result in an accidental or inadvertent (such as spills) release of hazardous materials into the environment due to satisfactory remediation pursuant to the RWQCB's remediation regulations for USTs, such as installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting and/or corrective action, and enforcement. The goal of the UST program is to protect public health and safety and the environment from releases of

71 California State Water Resources Control Board, GeoTracker, accessed March 2019, available at <https://geotracker.waterboards.ca.gov/>.

72 California Health and Safety Code Division 20, Chapter 6.7, Section 25298, *Underground Storage of Hazardous Substances*

73 California Code of Regulations, Title 23. Waters Division 3. State Water Resources Control Board and Regional Water Quality Control Boards Chapter 16. Underground Tank Regulations Article 7. *Underground Storage Tank Closure Requirements*.

74 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, <https://pw.lacounty.gov/epd/UST/closure.cfm>.

petroleum product and other hazardous substances from the tanks. The UST closure for the proposed Project would also comply with the State Water Board's Low Threat Underground Storage Tank Case Closure Policy, discussed in *Section 4.8.3.2*.

Under existing policy, regulatory agencies consider site-specific conditions when determining if the level of corrective action ensures the protection of human health, safety, and the environment pursuant to Health and Safety Code section 25296.10, subdivision (g). With the knowledge and experience gained over the last 25 years of investigating and remediating petroleum UST releases, site conditions and characteristics have been identified that if met, will generally ensure the protection of human health, safety, and the environment. This Policy identifies those standardized criteria, as discussed in *Section 4.8.3.2*.

In addition, the SCP would regulate and oversee any investigation and cleanup of any sites not overseen by the UST program.⁷⁵ Implementation and enforcement of federal and State laws and local ordinances for USTs at within the City of Inglewood are enforced by LACoFD and plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

Construction activities would disturb more than one acre and, thus, would be required to implement requirements of the NPDES General Construction Permit. This permit requires implementation of BMPs that would include measures to address the safe handling of hazardous materials, and in the unlikely event of an inadvertent release, also requires spill response measures to contain any release of hazardous materials. The use of construction BMPs implemented as part of a Stormwater Pollution Prevention Plan (discussed further in **Appendix 2.0.2: Initial Study**) as required by the NPDES General Construction Permit would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

75 42 USC Section 6901 et seq.

In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination. If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved and would be cleaned up in a timely manner in accordance with identified BMPs.

As described above, refueling activities of heavy equipment would be conducted in a dedicated and controlled area with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a less-than-significant impact.

Impacts resulting in a substantial release of hazardous materials into the environment through accident or upset conditions on the MSF site would be less than significant.

TPSS Sites

The proposed Project would involve the construction of TPSSs in two locations along the alignment. One of the proposed TPSSs would be collocated within the MSF, and the other would be situated on the City's Civic Center site at the southeast corner of the Prairie Avenue and Arbor Vitae Street intersection, north of the Prairie Avenue/Hardy Street Station.

Each of the TPSS stations would require approximately 3,000 SF and with 14 feet of clearance above the finished floor. It is also possible that the TPSS station proposed for the City's Civic Center site on Prairie Avenue may be below grade; as such, it would be of similar size and require excavation of soils from the site.

As described in *Section 4.8.4.1*, the City's Civic Center site on Prairie Avenue has undergone numerous site assessment evaluations and has been fully remediated in accordance with regulatory requirements. Should the TPSS at this location be located below grade, soil that would be removed would be tested in accordance with the SMP⁷⁶ to assure that it did not contain any remnants of prior contamination. If

76 Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

contaminated soil is encountered, it will be removed and disposed of in accordance with the requirements of the SMP and RWQCB.⁷⁷

Compliance with the SMP⁷⁸ and applicable federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during construction of the proposed Project.

Impacts would be less than significant.

Summary of Impacts

Construction activities involving the use of potential hazardous materials would adhere to regulatory requirements for handling, transport, and disposal. Construction of the guideway and stations in conjunction with the MSF and TPSSs would involve the demolition of existing buildings, which may have the potential release of hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Preparation and implementation of the Building Demolition Plan, Hazardous Materials Business Plan, Soil Management Plan, and Health and Safety Plan required by the ITC CCP incorporation of project design features discussed in the Construction Commitment Program, and would result in potential impacts to the public or the environment through reasonably foreseeable upset and accident conditions involving hazardous materials being less than significant.

Excavations of potentially contaminated soils may occur during construction of the proposed Project as a result of prior uses on some of the sites. Removal of the existing permitted UST would be removed as part of the proposed Project at the MSF site; if contaminated soil is encountered as part of the removal the site would be remediated in accordance with the appropriate UST closure requirements.⁷⁹ Soils on the City's Civic Center site on Prairie Avenue and other areas adjacent to Prairie Avenue have been fully remediated.

Construction activities associated with the proposed Project would comply with existing regulations governing the storage and handling of such chemicals and the response to the accidental release of such chemicals.

Implementation of the Building Demolition Plan and Hazardous Materials Business would ensure potential impacts from proposed Project construction would be less than significant.

Impacts from the construction of the proposed Project would be less than significant.

77 Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

78 Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

79 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, <https://pw.lacounty.gov/epd/UST/closure.cfm>.

Operation

Operation of the proposed Project would involve the use of relatively small quantities of common hazardous materials including paints and thinners, cleaning solvents, fuels, oils, and lubricants. The operation of the proposed Project would not involve the types of hazardous emissions that are typical of industrial land uses and which require source regulation and permitting. Hazardous materials, including diesel fuel for backup generators would be stored within appropriate storage containers in accordance with regulatory requirements, such as the Hazardous Waste Control Act. This would ensure that there would be no unregulated emissions of hazardous materials.

The operation of the proposed Project would be subject to the requirements of programs administered by the Los Angeles County Fire Department HHMD program for storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to facility-specific HMBPs. The preparation and implementation of facility-specific HMBPs would be required for the MSF and TPSSs, and the HMBPs would identify safe measures to store, handle, and dispose of hazardous materials such that accident and upset conditions are minimized. The HMBPs would also include spill response measures to ensure that in the unlikely event that a release does occur, protocols would be implemented to contain and control any accidental release in a manner that is protective of human health and the environment. Such protocols could include employee training, the location of absorbent materials to contain a release, and notification requirements to ensure that human health and the environment is protected from any exposure. The adequacy of and compliance with the HMBPs would be overseen and enforced by the HHMD. Because a comprehensive set of enforced laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards to the public and environment

During operation of the proposed Project, all potentially hazardous materials would be used and stored in accordance with the manufacturers' instructions and handled in accordance with all applicable federal, State, and local regulations, including those set forth by the federal and California Occupational Safety and Health Administration (CalOSHA), and the HHMD. The City's Fire Department (Los Angeles County Fire Department [LACFD]), as part of the design and operation conditions, will review plans to ensure proper storage of hazardous substances, accident response plans, inspections, and monitoring by the LACFD to minimize hazards to an acceptable level. Such requirements include obtaining material safety data sheets from chemical manufacturers; making these data sheets available to employees; labeling chemical containers in the workplace; developing and maintaining a written hazard communication program; and developing and implementing programs to train employees about hazardous materials.

Compliance with the regulatory requirements will ensure that hazardous materials on site are appropriately stored and handled and would not result in hazardous emissions. Because a comprehensive

and enforced set of laws and regulations govern the transportation and management of hazardous materials so as to reduce the potential hazards to levels that minimize health risks.

Only minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. No industrial operations are planned, and no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project once completed. Therefore, accidental releases of hazardous materials, such as janitorial or household chemicals, could occur, but such releases would be minor.

With respect to transportation of hazardous materials, as previously discussed, such transport is regulated by US DOT and Caltrans, which together determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In addition, and as discussed in the Regulatory Setting, all businesses in the vicinity of the proposed Project that handle, generate, and dispose of hazardous materials would be required to prepare and implement facility-specific HMBPs under the auspices of the HHMD and in accordance with the Hazardous Waste Control Act.⁸⁰

Impact would be less than significant.

Guideway and Stations

The stations would include operation of HVAC equipment and use of materials typical to an industrial setting such as cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products used in normal vehicle fleet operations, coolants, absorbents, oil and fuel products, and machining waste. Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during station operation. The proposed Project would comply with planning and emergency response regulations pertaining to the presence of such materials during operation.

Impacts would be less than significant.

Maintenance and Storage Facility and MSF TPSS

The operation of the MSF would be subject to the requirements of programs administered by the Los Angeles County Fire Department's HHMD for storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to a facility-specific HMBP.

⁸⁰ California Health and Safety Code section 25100 et seq., Hazardous Waste Control Act.

The MSF would require the use of equipment, tools, and materials for maintenance activities; these may also require the use of various materials and substances that could be considered hazardous. The MSF would use and store bulk quantities of hazardous materials—such as fuel, solvents, oil, transmission fluid, paints and other chemicals—that would have the potential to be released into the environment if not properly handled and stored. The proposed Project would comply with existing regulations governing the storage and handling of such chemicals, and applicable regulations to responding to accidental release of such chemicals.

The MSF would include a TPSS that would house transformers, DC rectifiers, primary and secondary switchgear, auxiliary power and other propulsion related equipment, and backup diesel generators required to provide power to the vehicle propulsion and operation of the MSF and stations. The use of common hazardous materials would occur as part of the operation of the proposed Project, primarily associated with maintenance activities as well as storage of diesel for the backup generators. If released, diesel stored for the backup generators could cause adverse effects to the public and the environment. Pursuant to the provisions of programs administered by the Los Angeles County Fire Department’s HHMD, storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to the facility-specific HMBPs.

Impacts would be less than significant.

City of Inglewood Civic Center TPSS

As with the MSF site TPSS, the TPSS at the City’s Civic Center site on Prairie Avenue would house transformers, DC rectifiers, primary and secondary switchgear, auxiliary power and other propulsion related equipment, and backup diesel generators required to provide power to the vehicle propulsion and operation the stations. During operation, the Civic Center TPSS would require the use of equipment, tools, and materials for maintenance activities; these may also require the use of various materials and substances that could be considered hazardous.

As previously noted, the TPSS at the City’s Center site on Prairie Avenue would include the storage of diesel for backup generators, which, if released, could cause adverse effects to the public and the environment. Pursuant to the provisions of programs administered by the Los Angeles County Fire Department’s HHMD, storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to the facility-specific HMBPs.

The proposed Project would comply with existing regulations governing the handling of any hazardous maintenance materials, and applicable regulatory requirements to responding to accidental release of such hazardous maintenance materials.

Impacts would be less than significant.

Summary of Impacts

The proposed Project would use and store hazardous materials during operation typical of those used in an industrial setting. The stations and MSF would include operation of HVAC equipment and use of industrial materials that may include some considered as hazardous. MSF operation would use and store bulk quantities of hazardous materials that would have the potential to be released into the environment if not properly handled and stored. TPSS maintenance activities may also require the use of various materials and substances that could be considered hazardous.

The proposed Project would comply with federal, State, and local regulations governing the handling of any hazardous materials, and applicable regulatory requirements to responding to accidental release of such hazardous maintenance materials.

Impacts from the operation of the proposed Project would be less than significant.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

Impact HAZ-2: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

As described in *Section 4.8.3.3*, the proposed Project would be constructed in accordance with current design standards and building codes, which is therefore consistent with the MHMP. Implementation of these standards and codes would minimize the loss of life and property from natural hazard events and protect public health and safety. As a development project, the proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems.

Construction

The proposed Project is located largely within public rights-of-way. For this reason, construction activities would likely cause the temporary closure of travel lanes, roadway segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

The City of Inglewood Public Works Department, Transportation Division operates and maintains the following:

- ITS traffic management center and intersection monitoring cameras
- Traffic signals and stop signs
- Intersection design and roadway alignments
- Public parking structures and lots
- Parking meters
- Parking permit districts
- Crosswalks and roadway striping
- Street lighting
- Street and traffic signs
- Street closures and barricades

The City Department of Public Works Engineering Division are responsible for issuing permits related to street closures for construction activities including Encroachment and Excavation Permits - An encroachment or excavation permit is required for all construction work within or related to the use of any public street right-of way.

Temporary Closures of Roadways and Sidewalks

AS discussed in **Section 3.7: Construction** in **Section 3.0**, construction with the public rights-of-way including streets would result in temporary street and/or lane closures as follows:

- Phase 1 work relating to utility locations within streets may require stabilization efforts for protection in place, possible utility relocations, and new utility installation for utilities such as: electrical, water lines, gas lines, storm drains, sewer lines, temporary traffic signals and streetlights. This could require removal and disposal of existing sidewalks, roadways, landscape, medians, as well as new or temporary pavement and asphalt for road work and sidewalks. However, as described in **Section 4.14**, possible relocation of utilities is unlikely during Project construction.

- Phase 2 involves the guideway along Prairie Avenue from Hardy Street to Manchester Boulevard and the Prairie Avenue/Hardy Street and Prairie Avenue/Pincay Drive Stations. As with Phase 1, Phase 2 work relating to utility locations within streets may require stabilization efforts for protection in place, possible utility relocations, and new utility installation. This could require removal and disposal of existing sidewalks, roadways, landscape, medians, and demolition, as well as new or temporary pavement and asphalt for road work and sidewalks.

Work would include the installation of a K-Rail system on the west side of Prairie street to delineate the construction area along Prairie Avenue from Hardy Street to Manchester Boulevard. The installation of the K-Rail system would require temporary street closures and loss of lanes. This would include closure of up to twenty-two feet of the west side of Prairie Avenue to allow for construction of foundations and columns and construction staging sections along Prairie Avenue. To minimize traffic impacts, lane reversals (or contra-flow) will be implemented to facilitate the peak hour traffic direction.

Construction activities would then switch to the east side of Prairie Avenue to install a K-rail system to delineate the construction area, which would utilize approximately fifteen-feet of public ROW. The installation of the K-rail system on the east side of Prairie Avenue would result in temporary lane closures starting from the easterly face of the curb on the eastern side of Prairie Street, excluding sidewalk, from Hardy Street to Manchester Boulevard. If needed, a temporary easement or utility setback may be utilized to secure staging areas along Prairie Avenue. These areas would include the installation of foundation components and columns to facilitate aerial construction. To minimize traffic impacts, lane reversals (or contra-flow) will be implemented to facilitate the peak hour traffic direction.

Phase 2 also includes aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of stations and mezzanines with vertical circulation elements. This work would include temporary closures during the following activities for safety measures as follows:

- During the formwork phase, traffic would not be allowed to pass underneath the structure.
 - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms, temporary lane closures may be necessary.
- Phase 3 of construction would occur for the guideway along Manchester Boulevard from Prairie Avenue to Market Street, Market Street from Manchester Boulevard to Florence Avenue, the Market Street/Florence Station, and pedestrian crossing to the Metro Crenshaw/LAX Line Station.

Phase 3 of construction would include, among other actions, the following:

- Utility work, including potential relocations, and new utility installations.
- Removal of existing sidewalks, roadways, landscaping, and demolition as needed. This work includes new or temporary pavement and asphalt for road work and sidewalks.

- The installation of a K-Rail system on the south side of Manchester Boulevard to delineate the construction area. The installation of the K-Rail system would require use of public right-of-way and temporary lane and/or street closures from southerly face of curb, excluding sidewalks, along Manchester Boulevard from Prairie Avenue to Market Street. To minimize traffic impacts, lane reversals (or contra flow) will be implemented to facilitate the peak hour traffic direction.

Construction activities would then switch to the north side of Manchester Boulevard to install the K-rail system to delineate the construction area. Installation of the K-rail system would be phased such that approximately twenty-two feet of the public right-of-way, starting from the northerly face of curb, excluding sidewalks, would be required at a time. The phased installation would begin at Prairie Avenue and move toward Market Street. To minimize traffic impacts lane reversals (or contra-flow) will be implemented to facilitate the peak hour traffic direction.

Phase 3 includes aerial construction of the guideway formwork with precast trapezoidal troughs and girders, and completion of stations and mezzanines with vertical circulation elements. This work would include temporary street and lane closures during the following activities for safety measures:

- During the formwork phase, traffic would not be allowed to pass underneath the structure.
 - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. temporary lane closures would be necessary.
- Phase 4 of construction would not require street closures as work would occur at the MSF and within the interior of the stations and guideway.

The closure of streets would be temporary and would be confined to the construction phase of the proposed Project and would typically occur during off-peak and/or night hours. Closures would be temporary in nature and would not last the entirety of the Project construction phase. However, the phased construction duration of the proposed Project will be approximately five years, which could adversely affect the existing emergency access routes and services.

Specifically, the proposed Project would restrict streets that are designated as evacuation routes in the Safety Element of the City’s General Plan, including Florence Avenue, Prairie Avenue and Manchester Boulevard, for temporary street closures. Such closures could interfere with emergency response or evacuation plans involving the use of Florence Avenue, Prairie Avenue and Manchester Boulevard, even though the closures would be conducted in accordance with the City’s permitting process and would not last the entirety of each construction phase. Adjacent collector/local streets could be used to access on either side of Florence Avenue, Prairie Avenue and Manchester Boulevard during a temporary street or lane closure.

The ITC CCP will require the contractor to coordinate with the City's Department of Public Works Transportation and Engineering Divisions regarding all potential street and/or lane closures during construction. The contractor would be required to prepare temporary street closure and traffic control plans prior to any street closure for demolition or construction activities within the public rights-of-way for any streets that would be closed or have lane restrictions; these temporary street closure and traffic plans would be reviewed and approved by the City's Public Works Department, Transportation and Engineering Divisions.

A Worksite Traffic Control Plan and Traffic Management Plans (TMPs) would be prepared with input from all applicable local agencies including fire services, police services and the City as required by the CCP. The traffic management plans would include detours and alternative routes for emergency services. The final traffic management plans would be submitted to the City's Public Works Department, Transportation and Engineering Divisions for approval. The plan would require that emergency access to the City's designated evacuation routes be maintained throughout the proposed Project's construction period. Traffic control plans would meet Federal Highway Administration (FHWA) Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways.⁸¹ The MUTCD is a compilation of national standards for all traffic control devices, including road markings, highway signs, and traffic signals.

Preparation and implementation of the Worksite Traffic Control Plan and TMPs required by the ITC CCP ensure that adequate access or appropriate detour routes are provided along Florence Avenue, Prairie Avenue, and Market Street. Impacts would be less than significant.

Roadway Reconfiguration and Restriping

Roadway striping and cross-sections necessary for construction and implementation of the proposed Project are shown in **Figures 3.0-10 to 3.0-24: Striping Plans**, and **Figures 3.0-25 to 3.0-32: Cross-sections**.

All roadway and restriping plans would be reviewed and approved by the City's Department of Public Works, Transportation Division as part of the proposed Project's design phase. As part of the review process, the City would identify any conflicts with adopted emergency response requirements and would consult with the fire and police departments. The final plan for roadway configuration and restriping would reflect any conditions and requirements of the City. Therefore, the proposed Project could interfere with adopted emergency response plan or emergency evacuation; impacts during construction would be potentially significant.

81 Federal Highway Administration (FHWA). Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways. <https://mutcd.fhwa.dot.gov/>.

Operation

The proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operations.

The proposed Project would operate in conformance with established safety requirements. The American Society of Civil Engineers (ASCE) Standard 21, Part 1 - Automated People Mover Standards⁸² which addresses safety and performance requirements that apply to proposed Project. ASCE published a safety and security standard that included requirements that address federal and state regulations for independent safety oversight agencies. Safety and security programs should also adhere to ASCE 21, Part 4 (ASCE 21.4-08) - Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring.⁸³

Safety oversight of fixed guideway transit systems is required at the state government level under the Federal Transit Administration, Part 659, Rail Fixed Guideway Systems - State Safety Oversight requirements when there is a similar transit system operating within the state.⁸⁴ The proposed Project's safety and security programs would be subject to the requirements the of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, the operation of the proposed Project would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety requirements, the proposed Project would not conflict the requirements of an emergency response plan or emergency evacuation plan.

Therefore, impact is less than significant.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

82 American Society of Civil Engineers (ASCE). Standard 21 - Automated People Mover Standards. Part 1, Section 3 (ASCE 21-05). <https://ascelibrary.org/doi/book/10.1061/9780784408735>

83 American Society of Civil Engineers (ASCE). Standard 21, Part 4 (ASCE 21.4-08) - Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring. <https://standards.globalspec.com/std/1147223/ASCE%2021.4-08>

84 Code of Federal Regulations (CFR), Title 49. Transportation. Subtitle B. Other Regulations Relating to Transportation, Chapter VI. Federal Transit Administration, Part 659, Rail Fixed Guideway Systems; State Safety Oversight.

Level of Significance after Mitigation

Construction

Impacts would be less than significant.

Operation

Impacts would be less than significant.

4.8.8 CUMULATIVE IMPACTS

Hazardous materials and hazard impacts are generally localized to specific sites and do not combine with one another in a way to create a greater or more severe hazard. Because of the relative infrequencies and the variances in timing, the geographic scope for cumulative hazards and hazardous materials impacts varies based on the hazard and the significance threshold being analyzed. Impacts relative to hazardous materials usually depend on the nature and extent of the hazardous materials release, and existing and future soil and groundwater conditions. Hazardous materials incidents tend to be limited to a smaller more localized area surrounding the immediate location and extent of a release and could only be cumulative if two or more hazardous material releases overlapped spatially and contemporaneously.

The timeframe during which the proposed Project could contribute to cumulative hazards and hazardous materials effects includes the construction and operations phases. Similar to the geographic limitations discussed previously, it should be noted that impacts relative to hazardous materials are generally time-specific. Hazardous material events could only be cumulative if two or more hazardous material releases occurred at overlapping times.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials that would be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as with the proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms to the City Fire Department or appropriate jurisdiction having responsibility. All hazardous materials are required to be stored and handled according to the manufacturer's instructions and local, State, and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use, or disposal of hazardous materials would be minimized, and in the unlikely event of a release, would be localized in extent.

As discussed previously, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects are infrequent, and thus unlikely to occur simultaneously

in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the aforementioned reasons, the proposed Project, in conjunction with other cumulative projects, would not create a significant cumulative hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials.

A cumulative impact related to transport, use, or disposal of hazardous materials could occur if there were hazards releases in the vicinity and at the same time as a release associated with the construction or operation of the proposed Project. For the purposes of this analysis, the geographic scope considered for analysis of this criterion is a 1-mile-radius area from the proposed Project. A 1-mile radius is reasonable in light of the relatively small amounts and types of hazardous materials that would be associated with construction and operation of the proposed Project.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials such as might be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as with the proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms contained in a Hazardous Materials Management Plan and Hazardous Materials Business Plan. The HHMD, as the CUPA, and other CUPA agencies for the cumulative projects outside of HHMD jurisdiction, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state, and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use or disposal of hazardous materials would be minimized, and in the unlikely event of a release, would likely be localized in extent.

As noted above, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects within a 1-mile radius are infrequent, and thus unlikely to occur simultaneously in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively significant hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, this cumulative impact would be less than significant.

Construction and operation of the proposed Project, like the other largely residential and commercial cumulative projects identified in *Section 4.0.6*, would include the use of relatively small quantities of hazardous materials and generation of small amounts of hazardous wastes. The proposed Project and

other cumulative projects would not require the transport, storage, use, or disposal any unusually large, toxic, or explosive quantities of hazardous materials or hazardous wastes. The proposed Project and other cumulative residential and commercial projects, would use, store, handle, and dispose of relatively limited quantities of hazardous materials, such as cleaning fluids, lubricants, paints, and fuels. Similarly, these types of projects generate small quantities of hazardous wastes, including small leftover amounts of hazardous materials previously discussed, paint cans, medical wastes, and the like.

The proposed Project and cumulative projects and their associated businesses would be required to adhere to the comprehensive set of existing federal, State, and local regulatory requirements, including the HMBP programs administered by the HHMD. These programs require all users of hazardous materials to implement employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. In the unlikely event that an accidental release was to occur, these programs require spill response measures to ensure that incidents are quickly contained and, therefore, would not travel off site in a way that could cumulatively combine to affect large numbers of people or affect substantial parts of the environment.

The proposed Project and cumulative projects would be required to operate in conformance with established safety requirements during operation to ensure compliance with City emergency service and warning systems. The proposed Project and cumulative projects would operate in conformance with ASCE standards and Federal Transportation Administration requirements. The proposed Project's and cumulative projects' safety and security programs would be subject to the requirements the of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, operation of the proposed Project and cumulative projects would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety requirements, the proposed Project, in conjunction with other cumulative projects, would not conflict the requirements of an emergency response plan or emergency evacuation plan.

For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively considerable hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Therefore, cumulative impacts would not be significant.

4.8.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

There are no specific policies within the General Plan that apply to the proposed Project regarding hazards or hazardous materials. The City's General Plan Safety Element outlines measures related to potential

hazardous materials incidents. As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials.

There are no specific policies within the General Plan that apply to the proposed Project regarding emergency response and emergency evacuation plans. The City's General Plan Safety Element outlines measures related to disasters that require emergency evacuation plans. As discussed above, compliance with federal, State, and local laws and regulations relating to emergency response and emergency evacuation plans would ensure consistency with the General Plan Safety Element.