

4.3 PUBLIC HEALTH & SAFETY/ HAZARDOUS MATERIAL

This section of the EA/EIR summarizes the findings of a Phase I Environmental Site Assessment (ESA), dated March 24, 2003, prepared by Converse Consultants, and a Hazardous Materials Survey Report, dated April 10, 2003, prepared by Citadel Environmental Services, Inc. The Phase I ESA and Hazardous Materials Survey are contained within Appendix 4.3(A) and 4.3(B) of this EA/EIR. The Phase I ESA included a site walk, records research of available public files, and interviews with people knowledgeable about the site. The Hazardous Materials Survey consisted of interior sampling of the building for asbestos containing materials (ACMs), lead-paints, polychlorinated biphenyls (PCBs), biological and bacterial affected material, and radon. The purpose of these studies was to identify the environmental conditions on the site, the likely presence of any hazardous substances under conditions that indicate an existing release, past release, or a material threat of a release into structures, property, groundwater, or into surface drainage on the site.

4.3.1 AFFECTED ENVIRONMENT

Definitions

Hazardous Material

A number of properties may cause a substance to be considered hazardous, including toxicity, ignitability, corrosivity, or reactivity. A hazardous material is defined by the State of California as "*a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either: (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating irreversible illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed*" (Title 22, California Code of Regulations [CCR], Section 66084).

Hazardous Waste

Once a hazardous material is ready for discard, it becomes a hazardous waste. A "hazardous waste", for the purpose of this report, is any hazardous material that is abandoned, discarded or recycled (California Health and Safety Code, Section 25124). In addition, hazardous wastes occasionally may be generated by

actions that change the composition of previously non-hazardous materials. The same criteria that render a material hazardous make a waste hazardous: toxicity, ignitability, corrosivity, or reactivity.

Phase I ESA Methodology and Findings

Government Database Review

A review of available federal and state databases was conducted to identify government-regulated properties with recognized environmental conditions on or adjacent to the Hall of Justice site. The radii of investigation for federal and state agency lists was selected in accordance with the American Society of Testing Materials (ASTM) Standards for Environmental Site Assessments (E-1527-00).

- The Hall of Justice site is listed on the Facility Index System (FINDS) and Resource Conservation and Recovery System (RCRIS) – small generator database. The Hall of Justice uses previously reported waste to transport waste. No other information was reported on the database.
- The Los Angeles County Central Heating Plant located at 301 North Broadway Street (to the west of the Hall of Justice), is listed on the Underground Storage Tank (UST), Hazardous Waste and Substance Site (CORTESE), Facility Inventory (CA FID), Hazardous Waste Information System and the Hazardous Material Incident Report System (CHMIRS) databases. One active UST is reported to be located at the Central Heating Plant. The facility generated asbestos containing materials (ACMs) with a pH of greater than 2, and unspecified liquid mixture waste. The disposal method was reported as transfer station, recycle, and landfill. In 1990, a 30-gallon caustic soda release was reported and was limited to the soil. Based on the regulatory listings identified and resource affected (i.e., soil) there is a low probability that the identified known or potential recognized environmental conditions have impacted or could impact the Hall of Justice site.
- The U.S. Federal Courthouse, General Services Administration, located at 312 North Spring Street (to the east of the Hall of Justice) is listed on the UST, Historical UST (HIST UST), HAZNET, and Facility Inventory (FA FID) databases. In 1937, two 12,000-gallon diesel USTs were installed on the site. The facility generated waste oil and mixed oil, asbestos containing materials (ACMs), tank bottom polychlorinated biphenyls (PCBs), and liquids with PCB waste. The disposal method was recycle, landfill, and incineration. This facility also has an active UST. Based on the regulatory listings identified, there is a low probability that the identified known or potential recognized environmental conditions have impacted or could impact the Hall of Justice site.
- The Los Angeles County Criminal Courts Building, located at 210 West Temple (to the south of the Hall of Justice) is listed on the HIST UST, HAZNET, and CA FID databases. A 5,126-gallon diesel UST is reported at the site. The facility generated ACM. Disposal method was reported as landfill. Based on the regulatory listings identified, there is a low probability that the identified known or potential recognized environmental conditions have impacted or could impact the Hall of Justice site.
- The Los Angeles County Hall of Records, located at 320 West Temple (to the south of the Hall of Justice), is listed on the UST, HIST UST, HAZNET, and CA FID databases. An active UST is reported at this site. The facility generated organic solids, aged or surplus organics, organic liquid mixtures, liquids with pH greater than 2, unspecified alkaline solutions and inorganic solid waste. The disposal method was reported as transfer station, recycle, and landfill. Based on the regulatory listings identified, there is a low probability that the identified known or potential recognized environmental conditions have impacted or could impact the Hall of Justice site.

Oil and Gas Development Review

The State of California Division of Oil, Gas, and Geothermal Resources (DOGGR) Map was reviewed to identify active, inactive, or abandoned oil or gas wells on or adjacent to the Hall of Justice site. No active or inactive oil wells, or known oil and/or gas seeps were identified.

Local Agency and Records Review

City of Los Angeles Building and Safety Department Permit Records

The City of Los Angeles Building and Safety Department is responsible for issuing building permits in the area of the project site. Records available at the City of Los Angeles Building and Safety Department were reviewed to determine the development history on the project site. A chronological summary of pertinent permits is provided below in **Table 4.3-1, Chronological Summary of Pertinent Permits**.

Los Angeles County Department of Health Services

The Los Angeles County Department of Health Services (DHS) is the lead agency responsible for the implementation and enforcement of state and local waste management laws, regulations, and ordinance for the Hall of Justice site. The DHS indicated that in 1988 a fire in the narcotics area on the 7th floor of the Hall of Justice building resulted in toxic fumes and runoff being generated from approximately 100 pounds of cocaine. There were no other records or permits for the Hall of Justice site on file with the DHS.

City of Los Angeles Fire Department Underground Storage Tank (UST) Plan Check Division

The City of Los Angeles Fire Department Underground Storage Tank (UST) Plan Check Division that is one of the oversight agencies indicated that there are no records or permits for the Hall of Justice site on file.

City of Los Angeles Fire Department Hazardous Materials Division

The City of Los Angeles Fire Department Hazardous Materials Division, which is one of the oversight agencies, indicated that there is no record or permit for the Hall of Justice site on file.

**Table 4.3-1
Chronological Summary of Pertinent Permits**

Date of Permit	Permit Summary
1924	A building permit was issued to the owner, Los Angeles County, for the installation of basement sprinklers. The building was reported to be under construction. The use of the building was reported as county offices.
1948	A building permit was issued to the owner, Los Angeles County, for interior modifications. The use of the building was reported as offices. The age of the building was reported as 20 years.
1949	An alteration permit was issued to the owner, Los Angeles County, for miscellaneous alterations to the building. The use of the building was reported as Hall of Justice.
1950	Permits were issued to the owner, Los Angeles County, for miscellaneous plaster additions and installation of acoustic ceilings on the 5 th floor of the building. The use of the building was reported as office building (Hall of Justice) and courthouse (Municipal Court Building).
1951	A building permit was issued to the owner, Los Angeles County, related to closing and roofing the existing bridge area on the 3 rd floor of the Hall of Justice building. The size of the building was reported as 185 feet by 229 feet. The building was reported to be 14 stories high.
1952	A building permit was issued to the owner, Los Angeles County, for the construction of a retaining wall. Two (2) buildings, Hall of Justice building and Municipal Court building, were reported on the Property. A certificate of occupancy permit was issued to the owner, Los Angeles County, for a 24 feet by 42 feet enclosure of a bridge area on the 3 rd floor in the existing 14-story building.
1954	Building permits were issued to the owner, Los Angeles County, for miscellaneous partition walls to the equipment room and installation of acoustic ceilings in the grand jury room on the 5 th floor. The use of the building was reported as office. One building was reported on the lot. The building was reported to be 14 stories and had been occupied for 30 years.
1955	Building permits were issued to the owner, Los Angeles County, for miscellaneous construction work on the 4 th floor of the 14-story Hall of Justice Building. The use of the building was reported as office and courtrooms.
1956	A permit was issued to the owner, Los Angeles County, for the installation of miscellaneous plumbing/lighting fixtures and office partitions. The use of the building was reported as office.
1957	A permit was issued to the owner, Los Angeles County, for construction of miscellaneous interior partition walls. One building was reported on the lot. The use of the building was reported as office.
1958	A permit was issued to the owner, Los Angeles County, for the construction of a telephone equipment and operating room on the 5 th floor. The size of the lot was reported as 200 feet by 245 feet. The use of the building was reported as office and county jail.
1959	Permits were issued to the owner, Los Angeles County, for miscellaneous interior construction. The use of the building was reported as office (Hall of Justice).
1962	A building permit was issued to the owner, Los Angeles County, for the construction of a hoist and monorail inside the morgue located on the 1 st floor of the building. The lot size was reported as 229 feet by 185 feet. One (1) building (Hall of Justice) was reported on the Property.

Source: Converse Consultants, March 2003

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD), which is one of the oversight agencies, indicated that there is no record or permit for the Hall of Justice site on file.

Los Angeles Regional Water Quality Control Board

The Los Angeles Regional Water Quality Control Board (RWQCB) maintains a database of permitted (registered) USTs. Permits are also required for the abandonment of USTs and clarifier systems. The RWQCB indicated that there is no record or permit for the Hall of Justice site on file.

Aerial Photograph, Sanborn Map, and Topographic Map Review

Copies of historical aerial photographs/maps were reviewed from the Fairchild Aerial Photography Collection at Whittier College. The dates of photographs reviewed were dated as follows: 1929, 1934, 1937, 1941, 1946, 1960, and 1966.

Sanborn Fire Insurance Maps available for the site were requested to augment the aerial photograph review. The Sanborn maps reviewed were dated as follows: 1886, 1894, 1906, 1920, 1950, 1953, 1954, 1957, 1960, 1964, 1965, 1968, and 1970.

Topographic maps of the Pasadena, Los Angeles, and Hollywood quadrangles published by the USGS, were also reviewed. The topographic maps reviewed were dated as follows: 1894, 1896, 1898, 1902, 1921, 1953, 1966 photorevised 1981, 1966 photorevised 1972, 1972, 1966 photorevised 1981, 1981 photorevised 1994.

A chronological summary of the aerial photograph, Sanborn maps, and topographic maps are provided below.

- 1888, 1894 Sanborn Maps and 1896, 1898, 1900, 1902 Topographic Maps – The site is depicted as being occupied by a church building and several residential dwelling units. Residential dwelling units occupy the property to the north of the site. Commercial (office) and residential dwelling units occupy the property to the east of the site. To the west of the site is depicted as being occupied by commercial (hotel) and residential dwelling units.
- 1906 Sanborn Map – The site is occupied by residential dwelling units, retail stores, and a hotel. Residential dwelling units occupy the property to the north of the site. To the east and west of the site is occupied by mixed residential and retail store buildings. North Spring Street is named Buena Vista Street.

- 1920 Sanborn Map – The site is occupied by residential dwelling units and retail stores. To the north, east, and west is occupied by retail stores. A commercial building occupies the property to the south.
- 1929, 1934, 1937, 1941, and 1946 Photographs – The site is occupied by the Hall of Justice building. A second building, the Municipal Courts building, is evident on the northeast portion of the site. The property to the north of the site is undeveloped. A commercial building occupies the property to the south. Several commercial buildings with associated parking lots are located to the west. A multi-story commercial building is located to the east.
- 1950 Sanborn Map – Two buildings occupy the site including the Hall of Justice building and Municipal Courts building. The Hollywood Freeway beyond Aliso Street is evident to the north. The US Post Office and Courthouse building are located to the east. To the west is a two-story building which is under demolition and retail stores with associated parking lots.
- 1953, 1954 Sanborn Maps, and 1953 Topographic Map – No apparent changes occurred on the site from the previous Sanborn Map. No apparent changes occurred on the adjacent sites to the north and east. The property to the south beyond Broadway is occupied by parking lots. No coverage was available for the adjacent site to the south beyond Temple Street.
- 1960, 1966 Photographs, 1957, 1960, 1964, 1965, 1968, 1970 Sanborn Maps, and 1921, 1953, 1966, 1965 (photorevised), 1966 (photorevised), 1981 (photorevised) Topographic Maps – No apparent changes occurred on the site from the previous Sanborn Map. In the immediate vicinity of the Hall of Justice, the Federal Courthouse is located to the east, the Criminal Courts building to the south, the County of Los Angeles Central Heating and Refrigeration Plant to the west, and the 101 Freeway is to the north.

Site Reconnaissance

Converse Consultants conducted a site reconnaissance (March 23, 2003) to evaluate the present use and environmental conditions at the Hall of Justice site. The methodology involved walking the perimeter of the site and accessible exterior of the building while noting evidence of present and potential concerns.

During the site reconnaissance no evidence was observed of hazardous substances and petroleum products; storage tanks and related equipment; odors; standing surface water or other pools of liquid; drums and other containers of hazardous substances, petroleum products, or other unidentified contents; transformers or equipment containing PCBs; pits, ponds, or lagoons; stained soil or pavement; stressed vegetation; evidence of mounds. Depressed or filled graded areas; wastewater or any discharge into a drain, ditch or stream; wells either active, inactive or abandon; septic systems or cesspools; prior structures; or roads, tracks, railroad tracks or spurs.

Converse Consultants did, however, observe abandoned machinery along the north portion of the Hall of Justice building. No staining was observed in the area of the machinery. In addition, two 55-gallon plastic drums containing infectious waste were observed inside a steel storage unit on the north side of the property near the guard shack on the parking lots.

Hazardous Materials Survey

Citadel Environmental Services, Inc. conducted the Hazardous Materials Survey for the interior of the Hall of Justice building. The survey consisted of (1) a review of existing building documentation (e.g., as built drawings); (2) the collection and analysis of bulk samples of suspect Asbestos Containing Materials (ACM) and Lead Containing Paint (LCP); (3) visual inspection for universal wastes; (4) visual inspection for biologically and bacterially affected building materials, discarded medical waste, wastes, paints, solvents, and chemical containers; and (5) radon gas sampling.

Asbestos Containing Materials

Structures constructed or remodeled between 1930 and 1981 have the potential of ACM. These materials can include, but are not limited to: resilient floor coverings, drywall joint compounds, acoustic ceiling tiles, piping insulation, electrical insulation and fireproofing materials. The site was initially developed in 1925 with interior modification conducted until at least 1962. This was prior to the ban on ACM and therefore, the likelihood is high that the site contains these materials. As a result, a sampling of interior materials was made a part of the Hazardous Materials Survey.

A total of 168 samples were collected for analysis. Samples were taken from thermal system insulation, HVAC duct insulation, wall system materials, ceiling tile adhesive, HVAC vibration damper and seam tape, roof penetration sealant/mastics and roof field membranes. The amount and type of samples collected were done so in accordance with the National Emissions Standards for Hazardous Air Pollutants as authorized by the Federal Clean Air Act, and the Asbestos Hazard Emergency Response Act (AHERA). Samples were analyzed by polarized light microscopy.

Lead Containing Materials

Exposure to lead from older paint is possible when the paint is in poor condition or during its removal. In construction settings, workers can be exposed to airborne lead during renovation, maintenance or removal work. Lead-based paints were phased out of production in the early 1970s. Given the age of the Hall of Justice building, the likelihood is high that the site contains these materials. As a result, a sampling of interior materials was made a part of the Hazardous Materials Survey.

A total of 108 samples were collected for analysis. Samples were collected from interior plaster walls and ceilings, metal jail cell walls and bars, metal and wood doors/cases, ceramic tile, and metal window/frames.

Polychlorinated Biphenyls

In 1976, the United States Congress enacted the Toxic Substance Control Act (TSCA) that reviewed all industrial chemicals, including polychlorinated biphenyls (PCBs). Since the TSCA, the production and use of PCBs has been prohibited, limited or phased out. Each fluorescent light ballast manufactured between July 1, 1978 and July 1, 1998 that does not contain PCBs is required to be marked by the manufacturer with the statement, "No PCBs". If no labels are present, then the ballast is assumed to contain PCBs and has to be managed in accordance with applicable rules and regulations. PCB inspection consisted of visually inspecting F-40-type ballasts associated with predominantly light fixtures and electrical transformers found throughout the building.

Universal Wastes

Universal wastes consist of mercury-containing components such as fluorescent light tubes and switches and electronic waste such as computers, reprographic and telephone equipment. Universal waste inspection consisted of visually inspecting all accessible rooms, common areas, and ancillary spaces.

Biologically and Bacterially Affected Material/Industrial Hygiene

Biological and bacterial types of waste consist of animal waste and mold growth on building components. Industrial hygiene materials consist of spent chemicals, compressed gases, and equipment containing chlorofluorocarbon (CFC) refrigerant. Biologically and bacterially affected materials and industrial hygiene inspection consisted of visually inspecting all accessible rooms, common areas, and ancillary spaces.

Radon Gas

Radon is a radioactive gas that is present in the air. It is produced by the radioactive decay of radium that is found in soil and rocks everywhere. Radon gas decays into radioactive particles that can get trapped in one's lungs through normal breathing. As they break down further, these particles release small bursts of energy. This can damage lung tissue and lead to lung cancer over the course of a lifetime. Not everyone exposed to elevated levels of radon will develop lung cancer. The amount of time between exposure and the onset of the disease may be many years. The unit of measurement of radon in the United States is the Pico curie per liter of air (pCi/l). Typical outdoor levels of radon range from 0.1 to 0.5 pCi/l. Sampling for Radon gas was performed using activated charcoal absorption devices, which were placed in each of the four corners of the basement.

4.3.2 THRESHOLDS OF SIGNIFICANCE

The County of Los Angeles Initial Study (**Appendix 1.0**) suggests that a project would result in a significant impact to environmental safety if it would meet any of the following criteria:

- Are any hazardous materials used, handled, or stored on site?
- Are any hazardous wastes stored on site?
- Are any pressured tanks to be used on site?
- Are any residential units, schools, or hospitals located within 500 feet and potentially adversely affected?

According to the Initial Study, no pressurized tanks are to be used on site; and no residential units, schools, or hospital are located within 500 feet of the site. As a result, the following impact analysis will only evaluate the project's potential impacts to environmental safety relative to criteria (a) and (b).

4.3.3 POTENTIAL IMPACTS OF ALTERNATIVES

Alternative 1 – No Project Alternative

Under Alternative 1, the Hall of Justice would remain vacant and unsafe for occupancy and would continue to deteriorate physically. Implementation of this alternative could result in long-term public health hazards due to the non-removal of existing on-site hazardous materials.

Alternative 2 – Repair and Reuse Alternative (Proposed Alternative)

Phase I Environmental Site Assessment

Based on a site reconnaissance, a review of aerial photographs, and available database and published information, several conclusions can be made regarding the project site. First, based on the aerial review, the project site has been developed since at least 1888 and did not appear to contain any hazardous material disposal or storage facilities. In addition, neither the project site nor adjacent properties were identified in a review of available federal, state, or county records as having existing or potential recognized environmental hazardous material conditions that would impact soil or groundwater at the site. Consequently, no potential impacts were identified as a result of a review of these sources.¹

¹ Converse Consultants, *Phase I Environmental Site Assessment Report*. 211 West Temple Street, Los Angeles, California, March 24, 2003.

Hazardous Material Survey

Asbestos Containing Materials

In order to determine the presence of, or lack of, ACM, a total of 168 samples were collected at the project site from existing on-site structures. Samples were collected from thermal system insulation, HVAC duct insulation, wall system materials, ceiling tile adhesive, HVAC vibration damper and seam tape, roof penetration sealant/mastics and roof field membranes. All samples were subjected to laboratory tests for ACMs. Of the 168 samples taken at various locations throughout the building, 51 of the samples contained ACMs.²

During renovation and construction activities, Alternative 2 could result in the disturbance of friable (intact) ACMs or in a form that could allow fibers to become airborne. Potential health and safety impacts associated with the proposed project could result to anyone in the area (including construction workers and persons residing in the vicinity of the building) who may breathe in the fibers. As such, Alternative 2 could result in a significant impact.

Lead Containing Materials

Lead was detected in many of the samples collected within the building. The paint film on numerous components was observed to be in defective conditions (i.e., peeling, blistering, etc.).³ Any exposure to lead from older paint is possible when it is in poor condition or during its removal. Within the construction settings, workers can be exposed to airborne lead during renovation, maintenance or demolition work. Potential health and safety impacts associated with the Alternative 2 could result to anyone in the area (including construction workers and persons residing in the vicinity of the building) who may be exposed to lead paint. As such, Alternative 2 could result in a significant impact.

Polychlorinated Biphenyls

The production and use of PCBs has been prohibited, limited or phased out. Each fluorescent light ballast manufactured between July 1, 1978, and July 1, 1998, that does not contain PCBs is required to be marked by the manufacturer with the statement, "No PCBs". If no labels are present, then the ballast is

² Citadel Environmental Services, *Hazardous Materials Survey Report, Los Angeles County Hall of Justice Building, 211 West Temple Street, Los Angeles, California, May 9, 2003.*

³ Ibid.

assumed to contain PCBs and has to be managed in accordance with applicable rules and regulations. Many of the existing ballasts are assumed to contain PCBs.⁴

During renovation and construction activities, Alternative 2 could result in the disturbance of PCB containing light ballasts. Potential health and safety impacts associated with the Alternative 2 could result to anyone in the area (including construction workers and persons residing in the vicinity of the building) who may be exposed to PCBs. As such, Alternative 2 could result in a significant impact.

Universal Waste

Fluorescent light tubes and electronic waste (computer, reprographic, and telephone equipment) was observed throughout the building. Such components typically contain concentrations of lead, mercury, cadmium/lithium, and beryllium. Failure to remove these items prior to renovation activities could result in significant impacts to construction workers and persons residing in the vicinity of the building

Biologically and Bacterially Affected Material/Industrial Hygiene

Biological and bacterial waste such as animal waste, vermin carcasses, human waste, and medical waste was observed throughout the building.⁵ In addition, spent and partially used containers of chemicals were observed. Failure to remove these items prior to renovation activities could result in significant impacts to construction workers and persons residing in the vicinity of the building.

Radon

Sampling for Radon gas was performed using activated charcoal absorption devices, which were placed in each of the four corners of the basement.⁶ No detectable amount of Radon gas was present based on sampling.

Storage and Handling of Hazardous Materials

Office uses proposed on site might store and use moderate quantities of hazardous materials such as fuels, oils, solvents and other materials. A variety of state and federal laws govern the generation,

⁴ Citadel Environmental Services, *Hazardous Materials Survey Report, Los Angeles County Hall of Justice Building, 211 West Temple Street, Los Angeles, California, May 9, 2003.*

⁵ Ibid.

⁶ Ibid.

treating, or disposing of hazardous wastes. Los Angeles County would be required to submit an annual inventory of hazardous materials in use on site, as well as a business emergency plan, for an annual review as required by SARA III and Chapter 6.95 of the California Health and Safety Code. These requirements would be mandated per state and federal law. As such, potential impacts are considered to be less than significant through the implementation of standard state and federal requirements.

Alternative 3 – Adaptive Reuse of the Existing Building to Secretary of Interior Standards

Implementation of this alternative would result in the same impacts described under Alternative 2. Impacts associated with ACM, LCP, PCBs, universal waste, biologically and bacterially affected materials/industrial hygiene waste would be significant. Radon gas impacts would be less than significant.

4.3.4 MITIGATION MEASURES (ALTERNATIVES 2 AND 3)

The following mitigation measures are required for both Alternatives 2 and 3:

- HS-1** Asbestos-containing materials shall be removed or encapsulated under acceptable engineering methods and work practices by a licensed asbestos abatement contractor. Removal practices include, but are not limited to: containment of the area by plastic; negative air filtration; wet removal techniques; and personal respiratory protection and decontamination. The process shall be designed and monitored by a California Certified Asbestos Consultant. The abatement and monitoring plan shall be developed and submitted for review and approval by the appropriate regulatory agencies (currently the County of Los Angeles and South Coast Air Quality Management District).
- HS-2** Prior to the renovation of the building, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead abatement contractor, in accordance with local, state, and federal regulations.
- HS-3** The abatement contractor shall be informed of which paint on the buildings shall be considered as containing lead. The contractor shall take appropriate precautions to protect his/her workers, the surrounding community, and to dispose of construction waste containing lead paint in accordance with local, state, and federal regulations.

- HS-4** All on-site fluorescent light ballasts shall be assumed to contain PCBs, unless labeled "Does Not Contain PCBs", and shall be removed prior to renovation activities and disposed of by a licensed and certified PCB removal contractor, in accordance with local, state, and federal regulations.
- HS-5** All on-site fluorescent light tubes, and electronic waste shall be assumed to contain heavy metals and shall be removed prior to renovation activities and disposed of by a licensed and certified abatement contractor, in accordance with local, state, and federal regulations.
- HS-6** All biological and bacterial waste shall be removed prior to renovation activities by trained and equipped personnel.
- HS-7** All medical waste, including spent needles, shall be properly categorized and removed by a trained and equipped personnel prior to renovation activities.
- HS-8** All spent and partially used containers of chemicals shall be categorized/classified (acids, bases, etc.), lab packed, manifested, and removed prior to renovation activities by a licensed and certified abatement contractor, in accordance with local, state, and federal regulations.

4.3.5 ADVERSE IMPACTS AFTER MITIGATION (ALTERNATIVE 2 AND 3)

With the implementation of the mitigation measures, all potentially significant impacts under either Alternative 2 and 3 are expected to be less than significant.

