CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

(November 8, 2011)

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT TITLE:		**CALSTARS CODING:**
CleanTech Environmental, Inc. - Hazardous Waste Facility Permit		PCA: 22040 Site:
PROJECT ADDRESS:	**CITY:**	**COUNTY:**
5820 Martin Road	Irwindale	Los Angeles County
PROJECT SPONSOR:	**CONTACT:**	**PHONE:**
Agritec International, Ltd., dba CleanTech Environmental, Inc.	Robert Brown	(626) 255-5554

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

☒ Initial Permit Issuance ☐ Permit Issuance ☐ Permit Modification ☐ Closure Plan
☐ Removal Action Workplan ☐ Remedial Action Plan ☐ Interim Removal ☐ Regulations
☐ Other (specify):

STATUTORY AUTHORITY:

☒ California H&SC, Chap. 6.5 ☐ California H&SC, Chap. 6.8 ☐ Other (specify):

DTSC PROGRAM/ ADDRESS:	**CONTACT:**	**PHONE:**
Department of Toxic Substances Control Used Oil and Tanks Team 700 Heinz Avenue Berkeley, California 94710	Alfred Wong	(510) 540-3946

PROJECT DESCRIPTION:

DISCRETIONARY ACTION

In accordance with the Health and Safety Code (H&SC) Section 25200, the Department of Toxic Substances Control (DTSC) is considering the issuance of a full non-RCRA Hazardous Waste Facility Permit to CleanTech Environmental Inc. (CleanTech or Facility), EPA ID Number: CAL 000330453, to construct and operate a hazardous waste storage, transfer, and treatment facility in Irwindale, Los Angeles County, California, to collect, store, and treat used oil from offsite generators. The Facility will also collect, store and transfer waste antifreeze, oil contaminated solid waste, and non-RCRA wastewater.

PERMITTING HISTORY

The California Legislature passed the Hazardous Waste Control Laws in 1972. The U.S. Congress passed the Resource Conservation and Recovery Act (RCRA) in 1976. These two laws require all facilities that treat, store or

dispose of hazardous waste to obtain a permit to operate. In August 1991, DTSC received authorization from the United States Environmental Protection Agency (USEPA) to implement the federal RCRA program in California. As such, DTSC became the sole agency conducting comprehensive technical reviews of permit applications for hazardous waste facilities.

On September 10, 1992, USEPA promulgated a final listing decision for used oils that are recycled and also promulgated standards for the management of used oil under RCRA section 3014. USEPA determined that used oil that is recycled does not have to be listed as a hazardous waste since the used oil management standards being promulgated in the same rulemaking are adequately protective of human health and the environment. Used oil that is disposed of will need to be characterized like any other solid waste and need to be managed as hazardous if it exhibits a characteristic of hazardous waste or if it is mixed with a listed hazardous waste.

California's requirements for used oil are more stringent than federal requirements. The California Health and Safety Code (H&SC), Section 25250.4 requires used oil to be managed as a hazardous waste unless it qualifies for a recycling exclusion or is shown to meet the specifications for recycled oil.

All used oil brought to CleanTech will be stored, treated, and then tested to ensure that it meets the recycled oil standards in the California Health and Safety Code, Section 25250.1(a)(3)(B). If the used oil, after treatment, meets the recycled oil standards, then the recycled oil is no longer a hazardous waste. CleanTech will also accept and store waste antifreeze, non-RCRA wastewater and solid waste contaminated with oil.

CleanTech submitted a Permit Application to DTSC on September 1, 2010. The Permit Application underwent numerous DTSC reviews and required revisions by CleanTech. On May 13, 2011, DTSC issued a Notice of Deficiency to CleanTech with the items in the Application that needed to be revised. On November 10, 2011, DTSC determined that CleanTech Environmental, Inc.'s Permit Application was technically complete. A 45-day public comment period and a public hearing/meeting will be scheduled.

FACILITY LOCATION

The Facility is located on 5820 Martin Road in Irwindale, Los Angeles County, California, latitude 34° 7' 13" N and longitude 117° 56' 20" W (See Figure 1).

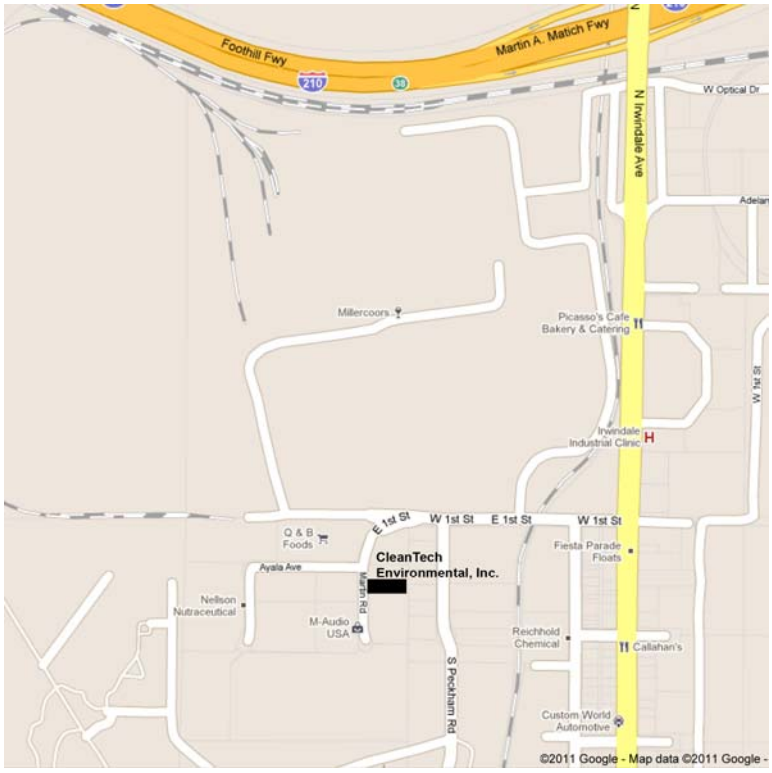

Figure 1. CleanTech Environmental, Inc. Location

The Facility site is a rectangular shaped parcel that is approximately 42,508 square feet (0.98 acre). It has been zoned M-2 for heavy industrial uses by the city of Irwindale Planning Department. There is currently one warehouse building on the site. The proposed CleanTech Environmental, Inc. facility will have five (5) permitted units within 2 process area: Process Area 1 and Process Area 2. Both process areas will be located within the warehouse building. The 5 permitted units are and are described further below:

1. Drum Storage Area
2. Multi-compartment Tank
3. Tank Storage and Treatment Area
4. Holding Tank
5. Loading/Unloading Area

The facility is bordered by Martin Road to the west, warehouse buildings on the north and south, and Wagner Steel Inc., structural steel manufacturer and fabricator, to the east. (See Figure 2). There are no schools, prisons, hospitals or other immobile populations located within the 2000 foot radius of the facility. Mountain View Elementary School, located 201 North Vernon Avenue in Azusa is approximately 1.2 miles northeast of the facility and Valleydale Elementary School located at 700 South Lark Ellen Avenue in Azusa is approximately 1.5 miles southeast of the facility.

Figure 2. Aerial View of Facility

Site History

Prior to 1939, the site was vacant land. Major portions of the surrounding areas were unused with some areas used for minimal agriculture cultivation. Between 1939 and 1966, the land use changed from minimal agriculture usage to numerous light, medium and heavy manufacturing sites and numerous chemical manufacturing facilities. Construction on the site began in 1984. The current building, concrete parking areas and the concrete wall enclosing the internal parking area/facility were all constructed during this initial 1984-1985 construction phase. A Certificate of Occupancy was issued for the site on February 2, 1985. Barron Boats Inc, also known as Hallett Boats and Le Barron Fiberglass Accessories, occupied the site from 1985 to 2007. The building was vacant from approximately 2005 to 2007 prior to the leasing of the property to CleanTech Environmental, Inc. CleanTech Environmental Inc. leased the site from Nickolas B. Barron Jr. (Barron Boats) in 2008 and currently occupies and uses the site as a fully licensed Hazardous Waste Transporter. A diagram of the facility layout, Figure 3, is below.

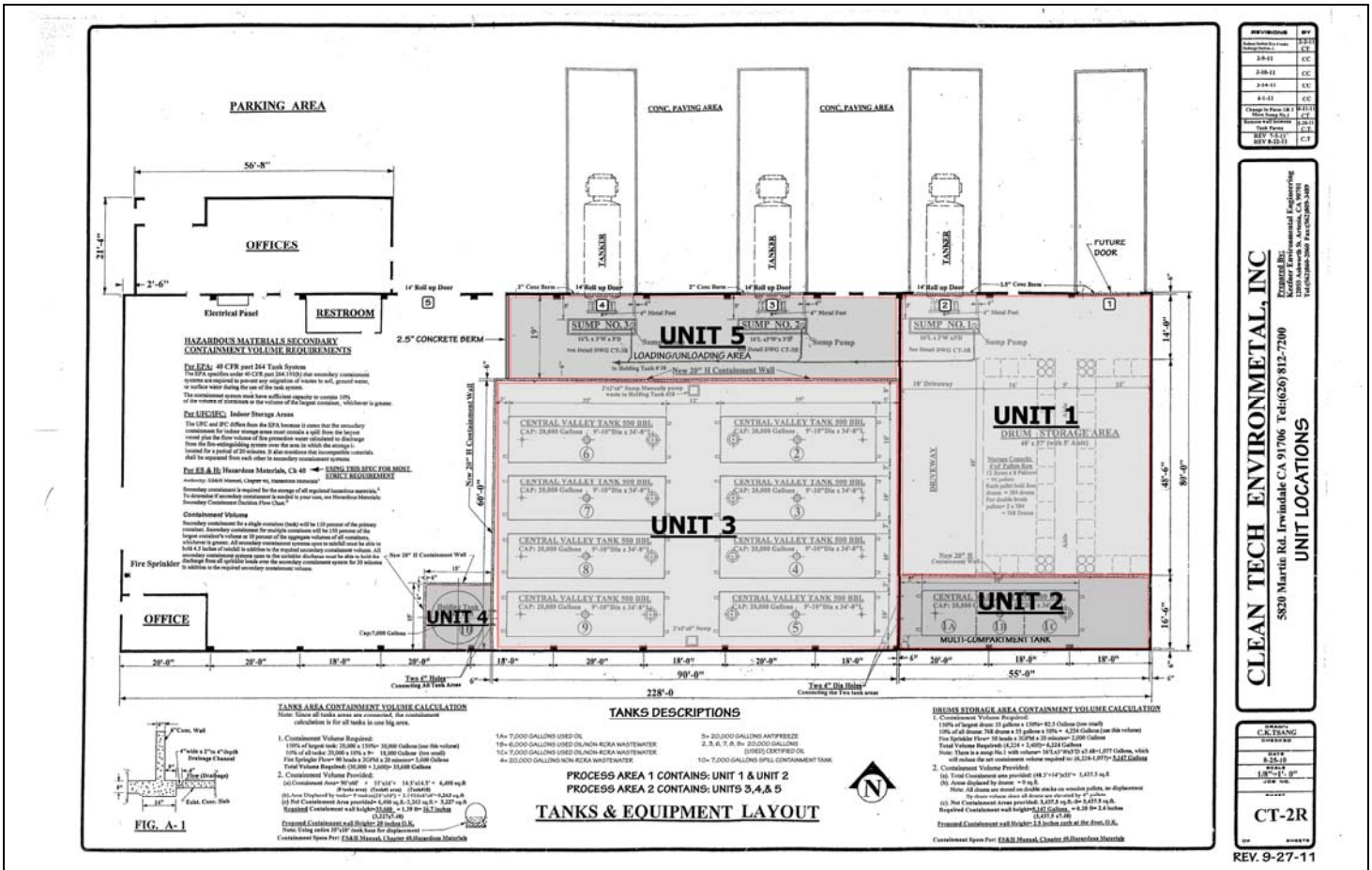

Figure 3. Facility Layout

Project Activities:

EXISTING AUTHORIZED UNITS

There are currently no authorized units at the CleanTech Environmental, Inc. facility. This will be a new facility.

Exempted Operations: Pursuant to section 66263.18, title 22, California Code of Regulations, CleanTech is not subject to the permitting requirements for hazardous waste storage when, during the normal course of transportation, hazardous wastes are held for 6 days or less, or 10 days or less for transfer facilities in areas zoned industrial by the local planning authority, as long as: (a) manifested shipment of packaged or containerized hazardous wastes are only transferred from one vehicle to another, and (b) the packages or containers are the same packages or containers.

PROPOSED PERMITTED UNITS AND OPERATIONS

The proposed CleanTech Environmental, Inc. facility will have five (5) permitted units within 2 process area: Process Area 1 and Process Area 2. Both process areas are located within a warehouse building. The 5 permitted units are:

1. Drum Storage Area
2. Multi-compartment Tank
3. Tank Storage and Treatment Area
4. Holding Tank
5. Loading/Unloading Area

PROCESS AREA 1

Process Area 1 contains two (2) Permitted Units identified as Unit #1: Drum Storage Area and Unit #2: Multi-compartment Tank. This area is located inside of the facility on the east side of the facility (See Figure 3).

UNIT #1: DRUM STORAGE AREA: The Drum Storage Area is used to store both liquid waste (used oil, non-RCRA oily wastewater and waste antifreeze) and solid waste contaminated with oil (oily rags, oil contaminated soil, cat litter used to absorb small spills at gas stations, etc.) in drums and other containers compatible with the waste material. Analysis of the solid waste contaminated with oil is conducted before the waste is collected. The Drum Storage Area is also used to storage of solid hazardous waste in a 10 to 15 cubic yard roll-off bin. Hazardous waste of the same waste type may be consolidated in containers in the area.

The Drum Storage Area consists of a 62 feet 5 inches by 55 feet by 5.5 inch thick reinforced concrete pad with a shallow 2.5-inch "drive-over" berm. To the east and west of this area are the warehouse walls. The south side has a 24-inch containment wall and to the north are roll-up doors with the 2.5-inch drive-over berm. There is one 16 feet long by 3 feet wide by 3 feet deep sump (Sump No. 1) with a capacity of 1,077 gallons to catch any spills from transfer or loading/unloading operations. This area also slopes toward the west into a concrete channel which is piped to Sump No. 1. Any liquid in Sump No. 1 is pumped to the Holding Tank (Unit #5). A concrete sealant is applied to the entire exposed interior surface area. Hazardous waste will be stored in 5 to 55 gallons drums, 250 or 330 totes, and 10 to 15 cubic yard roll-off bin. The most common size of the container used to store hazardous waste is 55 gallons.

The total maximum permitted storage capacity of the Drum Storage Area will be 42,240 gallons, inclusive of all drums, totes, and the roll-off bin.

UNIT #2: MULTI-COMPARTMENT TANK: The Multi-compartment Tank consists of one 20,000-gallon hazardous waste storage tank divided into 3 compartments (Tank #1A, Tank #1B, and Tank #1C) and the land on which it is situated. The entire tank measures 34 feet 8 inches long with a 9 feet 10 inch diameter and is constructed of steel. Tanks #1A and #1C are 7,000 gallons and Tank #1B is 6,000 gallons. The Unit is completely enclosed by the warehouse walls on three sides and a 20-inch high and 8-inch thick containment wall on the fourth. There are two 4-inch pipes connecting this secondary containment area with the secondary containment area of the Tank Storage and Treatment Area to provide one common secondary containment system with a capacity of 40,310 gallons. The foundation of this Unit is constructed of a reinforced concrete slab 8 inches thick and measures 55 feet by 16 feet 6 inches.

Used oil and non-RCRA wastewater are brought to the Facility in tanker trucks and unloaded into the appropriate tanks. There is no treatment allowed in any of these tanks. Tank #1A stores used oil. Tanks #1B and #1C store either used oil or non-RCRA wastewater. The total maximum permitted storage capacity of the Multi-compartment Tank is 20,000 gallons. The maximum permitted storage capacity of Tank #1A is 7,000 gallons, Tank #1B is 6,000 gallons, and Tank #1C is 7,000.

PROCESS AREA 2

Process Area 2 contains three (3) Permitted Units identified as Unit #3: Tank Storage and Treatment Area, Unit #4: Holding Tank, and Unit #5: Loading/Unloading Area.

UNIT #3: TANK STORAGE AND TREATMENT AREA: The Tank Storage and Treatment Area consists of 8 hazardous waste storage/treatment tanks (See Table 5) and the land on which they are situated. Each tank measures 34 feet 8 inches long with a 9 feet 10 inch diameter is constructed of steel. The tanks are enclosed within a 24-inch high, 8-inch thick wall on two sides, a 14-inch wall on the third side, and the warehouse wall on the fourth to provide a combined secondary containment capacity of 40,310 gallons. The foundation of this Unit is constructed of a reinforced concrete slab 8 inches thick and measures 90 feet by 60 feet. There is a 2 feet wide by 2 feet long by 6 inch deep sump near the north wall. Any liquid in the sump is manually pumped to the Holding Tank (Unit #4).

Used oil, waste antifreeze, and non-RCRA wastewater are brought to the Facility in tanker trucks and unloaded into the appropriate. Tanks #2, #3, #6, #7, #8 and #9 are used for the storage of used and/or certified oil. Tank #4 is used for the storage of non-RCRA wastewater and Tank #5 is used for the storage of antifreeze. The used oil may then be treated by blending, gravity separation, precipitation and/or dehydration to meet recycled oil purity standards in Health and Safety Code section 25250.1(a)(3). Used oil meeting the purity standards shall be recorded into the operating record. The tank is locked down. No additional used oil shall be pumped into the tank. Treated used oil that cannot meet the purity standards is managed as used oil.

Each tank has a maximum capacity of 20,000 gallons. The total maximum permitted storage capacity of the Tank Storage and Treatment Area is 160,000 gallons.

UNIT #4: HOLDING TANK: The Holding Tank consists of one 7,000-gallon poly storage tank and the land on which it is situated on. The tank is 10 feet high and 12 feet in diameter. The tank is totally enclosed by 20-inch containment walls. The secondary containment area of this Unit is connected to the secondary containment area of the Tank Storage and Treatment Area by two 4-inch pipes. The foundation of this Unit is constructed of a reinforced concrete slab 8 inches thick and measures 15 feet by 15 feet.

The Holding Tank is used for the storage of liquid waste from process spills collected from any of the various sumps located in the process areas. The Holding Tank also stores liquids collected from material spills, floor cleaning wastes, rainwater collection, etc.

UNIT #5: LOADING/UNLOADING AREA: The Loading/Unloading Area consists of a 19 feet by 90 feet by 5.5 inch thick reinforced concrete pad with a shallow 2.5-inch “drive-over” berm. To the east of the Unit is the warehouse wall. To the south is the 20 inch containment wall of the Tank Storage and Treatment Area. The west sides has a 2.5-inch “drive-over” berm and to the north are two roll-up doors with 2.5-inch drive-over berm. There are two 16 feet long by 3 feet wide by 3 feet deep sumps (Sump No. 2 and Sump No. 3) in this area. Each sump has a capacity of 1,077 gallons. The Loading/Unloading Area is graded toward the sumps to collect any spills that potentially could occur during transfer operations. The content of the sumps are manually pumped to the Holding Tank.

The Loading/Unloading Area is used to transfer liquid waste from and to transport vehicles (tanker trucks, tanker trailers, etc) to the appropriate tanks in the Tank Storage and Treatment Area. The Loading/Unloading Area is also used for transferring of liquid waste from transport vehicle to transport vehicle (i.e., tanker truck to tanker truck, tanker truck to tanker trailer, etc.). Sampling of any drums brought to the Facility may also be done in this Unit. The Permittee may consolidate hazardous waste of the same waste type in containers.

Secondary containment for the permitted units is provided for by a series of berms, walls, and sumps within the facility. Truck parking is located outside the warehouse building.

ENVIRONMENTAL IMPACT ANALYSIS

1. Aesthetics

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

The Facility will be located in an industrial portion of Irwindale. The borderline for the City of Azusa is approximately 10 feet east of the Facility and that area is also industrial. The Facility will be constructed inside an existing warehouse building. The façade of the building will not be substantially changed. All hazardous waste operations will occur inside the warehouse building. This project is not expected to degrade or improve the aesthetics of the site or area, therefore no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect on a scenic vista.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Create a new source of substantial light of glare that would adversely affect day or nighttime views in the area.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *City of Irwindale General Plan Update, June 2008*
- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011*
- *USGS Urban Areas Aerial Photograph dated 3/29/2004.*

2. Agricultural Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

The Facility is inside a land use zoned by the City of Irwindale for "M-2 – HEAVY MANUFACTURING." The areas west, north, and south of the Facility are also zoned by the City of Irwindale for "M-2 – HEAVY MANUFACTURER." The area east of Facility is zone for "HI - HEAVY INDUSTRIAL" by the City of Azusa. There is an area approximately ½ miles southwest of the Facility that lies within the Santa Fe Flood Control Basin and is zoned "AG - AGRICULTURAL"

Road access to and from the Facility does not cross any agricultural area before entering the freeway system (primarily Interstate 210 to the north of the Facility), therefore no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

References Used:

- *City of Irwindale General Plan Update, June 2008*

- *Final EIR, OSCO Proposed Phase 2 of Master Plan for Upgrading and Expansion of Solvent Recycling Facility in the City of Azusa, California, July 1990*
- *USGS Urban Areas Aerial Photograph dated 3/29/2004.*

3. Air Quality

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction of 5 new units

Description of Baseline Environmental Conditions:

The South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing air emissions from stationary (area and point) sources in most of Southern California. The jurisdiction of the SCAQMD includes the City of Irwindale and the CleanTech facility. No permit is required by the SCAQMD for operations at the CleanTech facility. The SCAQMD has prepared a series of Air Quality Management Plans (AQMPs), the most recent of which was adopted by the Governing Board of the SCAQMD on June 1, 2007. The 2007 AQMP demonstrates that applicable ambient air quality standards can be achieved within the timeframe required under federal law when existing and proposed projects comply with the applicable SCAQMD rules and regulations for new or modified sources. Following are the SCAQMD's thresholds of significance.

SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds [a]		
Pollutant	**Construction [b]**	**Operation [c]**
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants [d]		
NO2 1-hour average annual average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state)	
PM10 24-hour average annual average	10.4 µg/m^3 (construction) [e] & 2.5 µg/ m^3 (operation) 1.0 µg/ m^3	
PM2.5 24-hour average	10.4 µg/m^3 (construction) [e] & 2.5 µg/ m^3 (operation)	
Sulfate 24-hour average	1 µg/ m^3	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) 9.0 ppm (state/federal)	

a. Source: SCAQMD CEQA Handbook (SCAQMD, 1993).
b. Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).
c. For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.
d. Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.
e. Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day ppm = parts per million µg/m3 = microgram per cubic meter ≥ greater than or equal to

For purposes of analyzing the proposed CleanTech Environmental Permit, pollutant emissions calculations evaluated carbon monoxide (CO), nitrogen oxides (NOx), reactive organic gases (ROG), particulate matter less than 10 and 2.5 microns (PM_{10}, $PM_{2.5}$), and lead and compared them to the SCAQMD established significance thresholds and localized significance thresholds (LST). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. The LSTs utilized for comparison purposes are based on a 5 acre site with a receptor distance of 25 meters. As the actual site acreage of the Facility is 0.98 acres this is considered a conservative assumption. The overall sum of emissions due to the Facility's operation is shown in Table 1 – Baseline and Net Increase in Facility Operations Emissions. This table does not include pollutant construction related emissions as these emissions are regulated by a separate significance threshold (refer to Table 4). Results show that the baseline and overall net increase of emissions are below the SCAQMD's significance thresholds and LSTs.

The pollutant that is in the closest proximity to a threshold is $PM_{2.5}$. However a significant portion of these PM emissions account for truck traveling to and from the site. Because much of this traffic occurs away from the site (calculations assume upwards of 50 miles), these totals should not be directly compared to the LSTs as their purpose is generally for a conservative comparison of on-site emissions that would relate to the 2.5 microgram per cubic meter ambient air quality threshold. For example, if the assumed mileage for PM calculations was decreased to just 10 miles to better account for truck travel that is nearby the Facility, then PM emissions would show to be well below a level that would be considered significant (i.e., total baseline PM_{10} and $PM_{2.5}$ would calculate to 1.0 and 0.98 lbs/day, respectively).

The Facility baseline emissions are shown in Table 1 – Baseline and Net Increase in Facility Operations Emissions and Table 1A – Totalized Current Baseline Facility GHG Emissions. Baseline emissions consider the site truck traffic and indirect GHG emissions related to the Facility's consumption of electricity.

The direct pollutant and GHG emissions from mobile combustion were calculated using the on-road emissions factors available from the SCAQMD (scenario year 2011), and were based on the maximum daily truck traffic to the site taking into account approximate mileage for local vendors normally used by the Facility. It is estimated that on any given day the traffic maximum is 30 trucks per day. For GHG emissions, calculations assumed that the truck traffic would occur 52 weeks per year, Monday through Saturday. Pollutant emissions did not make this assumption as their significance thresholds are daily while GHG emission significance thresholds are annual. Both sets of calculations assumed only local traffic (i.e. maximum of 50 miles per one way trip). Calculations are shown in Table 3A and 3B.

The indirect emissions calculations from Facility electricity usage only considered GHG emissions as required by the CCAR General Reporting Protocol Version 3.1, January 2009. The GHG emissions were calculated based on the Facility's 2010-2011 Southern California Edison billing. The Facility's energy usage and related GHG emissions are shown in Table 2A and Table 2B.

Analysis as to whether or not project activities would:

a. Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis:

The SCAQMD has prepared a series of Air Quality Management Plans (AQMPs), the most recent of which was adopted by the Governing Board of the SCAQMD on June 1, 2007. The 2007 AQMP demonstrates that applicable ambient air quality standards can be achieved within the timeframe required under federal law when existing and proposed projects comply with the applicable SCAQMD rules and regulations for new or modified sources. As discussed in subsection b. below, pollutant emissions calculations for carbon monoxide (CO), nitrogen oxides (NOx), and particulate matter less than 10 and 2.5 microns (PM_{10}, $PM_{2.5}$) demonstrate that the baseline and overall net increase of emissions of the proposed Project are below the SCAQMD's significance thresholds and LSTs. Compliance with the SCAQMD thresholds and LSTs would be consistent with the SCAQMD's air quality plan goals to achieve air quality standards within the timeframe required under federal law.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Impact Analysis:

Existing emissions of the Facility are below the SCAQMD's significance thresholds and LSTs. The net increase in pollutant emissions related to the Project were considered separately for the emissions related to construction and those related to overall Facility operation because the SCAQMD has different significance thresholds for each. Table 4 shows the totalized Facility construction emissions compared to the construction specific thresholds while Table 1 shows the totalized Facility net increase in operational emissions compared to the operational specific thresholds. Both tables show that the net increase related to the Project are below the SCAQMD significance thresholds and the LSTs.

Pollutant emission calculations related to the Project construction activities considered emissions from on and off-road vehicles utilized during construction, and fugitive PM emissions resulting from excavating activities and loading debris into trucks and/or roll-off bins. Vehicle related mobile combustion pollutant emissions were calculated using the on and off-road emissions factors available from the SCAQMD. Emissions from off-road vehicles assumed that on any given day there would be no more than ten cement trucks, one excavator, and one concrete pumper on-site with construction occurring from 6:00 am to 6:00 pm for a maximum 12 hour day. Emissions from on-road vehicles assumed local travel with a maximum increase in daily site traffic of 18 delivery trucks and 2 passenger vehicles to account for the increase in contractor travel.

The construction emissions related to the Project will also result in fugitive PM emissions related to excavating and debris loading activities. These calculations were completed utilizing AP-42, Table 13.2.3-1, Recommended Emission Factors for Construction Activities. The recommended factors included the dozer overburden factor and equation in Table 11.9-1 for site preparation/bulldozing, the equations listed in Section 13.2.4 for loading debris into trucks, and Table 13.2.4-1 for material silt and moisture content. For the purposes of these calculations debris/soil mixture was assumed to have the silt and moisture content of clay/dirt mix, which has silt content of 9.2% and a moisture content of 14%. The slightly higher moisture content is presumed reasonable as engineering controls such as surface wetting will be performed during these activities. The maximum debris loading per day is based on the maximum debris and soil removal effort, which is 40 cubic yards (cy) of soil and 90 cy of debris, occurring over a 3 day period for a maximum of 130 cy of soil/debris per day. Calculations assume a soil/debris density of 1.2 tons per cubic yard and a compact soil/debris to loose soil/debris conversion factor of 1.25.

The operational emissions related to the Project are minimal. Table 4 shows the expected increase of emissions related to the increase in truck traffic to the site. The calculations again utilized the SCAQMD's on-road emissions factors assuming a maximum increase in truck traffic of 18 trucks per day, local traffic.

The net increase in GHG emissions due to operation is shown in Table 2B. Direct mobile emissions continue to be the major contributor to the overall change in GHG emissions from the proposed project.

The proposed project design and control features would ensure compliance with existing and proposed SCAQMD air quality standards and avoid contributing substantially to an existing or projected air quality violation.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact Analysis:

Based on the findings presented in the analysis of air impacts in 3.a (above), proposed activities are not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:

There are currently no sensitive receptors identified in the area that would be impacted from air emissions related to the proposed Project. In addition, the proposed project design and control features would ensure compliance with existing and proposed SCAQMD air quality standards and avoid contributing substantially to an existing or projected air quality violation.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Create objectionable odors affecting a substantial number of people.

Impact Analysis:

The proposed Facility operations are subject to compliance with SCAQMD Rule 402 that will ensure that the project will not create objectionable odors affecting a substantial number of people.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).

Impact Analysis:

According to the California Department of Conservation, the project is not located in an area containing naturally occurring asbestos.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *SCAQMD air quality information at website: http://www.aqmd.gov/smog/historicaldata.htm*
- *Irwindale General Plan Update, June 2008, Chapter 6 (Public Safety Element): Air Quality*
- *A General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos, dated August 2000, by California Department of Conservation, Division of Mines and Geology*

- *Additional Air Quality Project Information, Proposed CleanTech Environmental Inc., TSDF Facility, Chemical Consultants, October 12, 2011*
- *SCAQMD Final 2007* Air Quality Management Plan

4. Biological Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

The Facility is located inside a heavy industrial zone. Major freeways are located 0.5 miles to the north (east-west Interstate 210), and 4.0 miles to the west (north-south Interstate 605). The area surrounding the Facility is highly industrial, manufacturing and/or commercial, except for the Santa Fe Dam Recreation Area located approximately 1 mile west of the Facility.

All waste, wastewater, and precipitation runoff is controlled within the Facility. Permanent containment structures have been constructed to prevent spills and contaminated runoff from leaving the Facility. Wastewater may be discharged to a sanitary sewer system under a permit issued by the Los Angeles County Sanitation District.

A number of threatened, rare, and/or endangered species are identified as being located within the general area of the Facility. However, the Facility and surrounding area is highly urbanized and does not have any sensitive habitat to impact. The nearest potential habitat area is in the Santa Fe Dam Recreational Area, which is located approximately 1 mile west of the Facility.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

The construction activities proposed in the Permit application would take place completely within the Facility boundary inside a warehouse building. The Facility is completely industrialized and no natural habitat exists within the Facility boundary. No occurrences of endangered or protected species have been identified within the Facility boundary.

The existing Facility does not impact any natural habitat, sensitive or otherwise. Industrial practices and regulations require the processing of waste to be contained within the Facility. Natural and man-made barriers prevent any impact from the Facility to reach the nearest natural setting; the Santa Fe Dam Recreational Area. Truck traffic does not go through natural habitat, and primarily uses Interstate 605, approximately 0.5 miles north of the Facility.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

The site does not contain riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The nearest riparian corridor is the Santa Fe Flood Control Basin, located approximately ½ mile west of the site. The Santa Fe Flood Control Basin contains alluvial scrub habitat; however, various barriers (mostly man-made) provide for a clear separation of the site from the natural alluvial scrub habitat. Therefore, the proposed project will not have a direct or indirect impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California

Department of Fish and Game or US Fish and Wildlife Service.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis:

The United States Army Corps of Engineers (USACE) regulates the dredge and fill of Waters of the U.S. through Section 404 of the Clean Water Act (CWA). The site is developed and does not impact federally protected waters or wetlands. Therefore, no impacts would occur on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means as a result of this project.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis:

As noted above, the Facility is located in an area zoned Heavy Industrial with no sensitive flora or fauna in or around the site. Additionally as noted throughout this analysis, although some construction is anticipated, work will be confined to above ground and within the Facility site boundary, therefore there will be no interference with movement of any native resident or migratory fish or wildlife species.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis:

For reasons noted above, this subsection is not applicable to the proposed project.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Impact Analysis:

The proposed project will be implemented consistent with the City of Irwindale's policy as it relates to maintaining current data and information on biological resources including the types of habitats, individual species and their locations. To facilitate the collection of accurate data, a Rarefind search was conducted to identify potentially impacted species as defined by the California Department of Fish & Game and the U.S. Fish and Wildlife Service sensitive and endangered species lists. The report detailing the results of this search is incorporated by reference and is attached to this Initial Study analysis. None of the listed species are located in and immediately around the Facility site.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *Figure B-3, Land Use Plan, City of Azusa, located within the RCRA Part B Permit Application (February 2009).*
- *Final Environmental Impact Report, OSCO Proposed Phase 2 of Master Plan for Upgrading and Expansion of Solvent Recycling Facility in the City of Azusa, California, dated July 1990, SCH No. 89051709, prepared by the City of Azusa, California*
- *Azusa General Plan, Chapter 5 (Natural Environment): Open Space and Biological Resource Preservation, April 2004.*
- *Jane Strong, California Native Plant Society, San Gabriel Mountains Chapter.*
- *The Natural History of the Santa Fe Dam Recreation Area website: http://cnps-sgm.org/santafedam/index.html*
- *Azusa General Plan, Chapter 5 (Natural Environment): Open Space and Biological Resource Preservation.*
- *California Wildlife Habitat Relations System, California Department of Fish and Game*
- *Natural Diversity Database, California Department of Fish and Game, August 30, 2009.*

5. Cultural Resources

Project Activities Likely to Create an Impact:

- Construction of 5 new units

Description of Baseline Environmental Conditions:

Cultural resources are the sites in the City of Irwindale that have a historical or cultural significance. These sites can be found in the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) or other state program. The agencies who have jurisdiction over the sites are the U.S. Department of the Interior (National Register), the California Office of Historic Preservation (California Register) and the City of Irwindale Planning Department. In order to be considered a site of cultural or historic significance to qualify for the National and California Register, the site must be significant in American history, architecture, archeology, engineering, and culture. Within the City of Irwindale, the City Planning Department is in charge of identifying to the city council which sites are historically significant to the City's architectural, artistic, cultural, engineering, aesthetic, historical, political, social and other heritage.

According to the City of Irwindale General Plan Update, the following table presents the existing historical resources in the City of Irwindale.

Existing Historic Resources in Irwindale		
Site/Structure	**Location**	**Description**
El Divino Salvador Presbyterian Church	Irwindale Avenue at Calle del Norte.	The first church founded in Irwindale.
Our Lady of Guadalupe Catholic Mission	Arrow Highway	The Church was constructed between 1917 and 1919.
Southern Pacific Railway Depot	Former Site	Also served as the first post office. The building was constructed in 1919.
Residence	2408 Mountain Avenue	The building served as a half-way house for the stage line
Don Gregorio home site	Terminus of Central Avenue	Former Site
Don Facundo Ayon‘s home site	City Hall	It serves as City Hall for the City of Irwindale.
Mr. Irwins Ranch property	Property extended along Cypress Avenue, from the what is now the City‘s corporate boundary with Baldwin Park continuing to Vincent Ave.	Former Site
Source: City of Irwindale, 2020 General Plan, Pages 116-117.		

The Facility site is located in an area zoned for industrial activities. Prior to 1939, the site was vacant land. Major portions of the surrounding areas were unused with some areas used for minimal agriculture cultivation. Between 1939 and 1966, the land use changed from minimal agriculture usage to numerous light, medium and heavy manufacturing sites and numerous chemical manufacturing facilities. Construction on the site began in 1984. The current building, concrete parking areas and the concrete wall enclosing the internal parking area/facility were all constructed during this initial 1984-1985 construction phase. During the 1984-1985 construction, no cultural or historical resources were discovered. The building and area has remained the same since then.

DTSC performed a search with both the National and California Register and found no sites or resources that were on or next to the Facility. DTSC also contact the City of Irwindale Planning Department. Ms. Brandi Jones, Associate Planner, confirmed there are no cultural or historical resources at the site. The closest historical/cultural site is the El Divino Salvador Presbyterian Church which is located one mile from the facility. Because of the distance from the proposed facility to the nearest historical site, construction and excavation on the site will not affect any of the historical sites.

In addition, DTSC contacted the Native American Heritage Commission (NAHC) and requested that the NAHC perform a file search for Sacred Lands on the project site. The NAHC responded on November 8, 2011 and stated that “Native American cultural resources were not identified in the project area.”

In the event that archaeological or paleontological resources should be encountered during excavation and grading activities, the City General Plan states all work would cease until appropriate salvage measures are established. Appendix K of the California Environmental Quality Act (CEQA) Guidelines shall be followed for excavation monitoring and salvage work that may be necessary. Salvage and preservation efforts will be undertaken pursuant to Appendix K requirements outlined in CEQA.

Even though it is highly unlikely that human remains are present on the site since no human remains were discovered during the initial construction in 1984-1985 and the site remained unchanged, it is possible that project activity could unearth previously unknown human remains. If this were to occur during construction, CleanTech shall implement the process specified by the California Health and Safety Code:

1. “In the event of discovery and recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with §27460) of Part 3 of Division 2 of Title 3 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her

determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains ... "

2. "If the coroner determines that the remains are not subject to his or her authority and if the coroner recognized the human remains to be those of a Native American, or had reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

For these reasons, no further analysis of potential impacts is required for the Cultural Resources Impacts.

Analysis as to whether or not project activities would:

a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

Impact Analysis:

As noted above, the site is not located in an area known to contain historical resources. Therefore, the project will not cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

Impact Analysis:

As noted above, the site is not located in an area known to contain archeological resources. Therefore, the project will not cause a substantial adverse change in the significance of an archeological resource as defined in 15064.5.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis:

As noted above, the site is not located in an area known to contain paleontological resource or site or unique geologic feature. Therefore, the project will not cause a substantial adverse change in the significance of a paleontological resource or site or unique geologic feature.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:

The site is located in an area zoned for industrial activities and both the property and surrounding property have already been developed. Additionally, no human remains were discovered during the initial construction in 1984-1985 and the site remained unchanged. Therefore, it is highly unlikely that human remains including those interred outside of formal ceremonies will be encountered. However, in the event such remains are encountered, the process

specified by the California Health and Safety Code and measures described above as contained in the City General Plan will be implemented.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *Irwindale General Plan, Chapter 5: Resource Management Element*
- *California Health and Safety Code, Section 7050.5.*
- *Letter from the Native American Heritage Commission, dated November 8, 2011, Re: Sacred Lands File Search and Native American Contacts list for the "Proposed CleanTech Environmental RAP Project;" located in the City of Irwindale, Los Angeles County*
- *National Register of Historic Places website, http://www.nps.gov/nr/*

6. Geology and Soils

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction and/or establishment of 5 new units

Description of Baseline Environmental Conditions:

The Facility is located within the Transverse Ranges geomorphic and structural providence. The Transverse Ranges consist of a series of east-west trending mountains from Point Conception to the west and as far as Arizona to the east. The mountains consist of pre-Cambrian crystalline rocks, Mesozoic plutonic and metamorphic rocks, with a discontinuous veneer of Tertiary and Quaternary sediments. The mountains are generally broken by similarly trending east-west faults. A frontal fault system follows the south edge along the ranges. Often the mountains are thrust to the south along this fault system which has been active in approximately its current configuration since lat Tertiary or early Quaternary time.

The Facility lies on the alluvial fan derived from the deposition of material transported from the interior of the San Gabriel Mountains by the San Gabriel River. It is a portion of the alluvial apron along the front of the mountain ranges.

As with all of Southern California, the Facility is subject to the effects of nearby, local earthquakes as well as large earthquakes.

The Facility lies on the alluvial fan of the San Gabriel River. The current channel of the San Gabriel River is controlled by the Santa Fe Dam and levees, and the alluvium at the site is not subject to reworking providing flood control measures do not fail. The unconsolidated material consists of boulders and cobbles up to 6 feet in size in a matrix of gray sand and gravel.

The exact depth of the bedrock directly under the site is approximately 1,000 feet below surface grade. The groundwater table is variable on the order of 100 to 200 feet below surface grade.

The fault nearest to the Facility is the Duarte Fault which lies about 1.5 miles north of the Facility. The Sierra Madre frontal fault zone lies about 2 miles north of the Facility.

Analysis as to whether or not project activities would:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- ❖ Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).
- ❖ Strong seismic ground shaking.
- ❖ Seismic-related ground failure, including liquefaction.
- ❖ Landslides.

Impact Analysis:

The City of Irwindale is not located in an Alquist-Priolo Earthquake Fault Zone. A study of earthquake zones for Los Angeles County indicates that the Facility is not located near a known Alquist-Priolo Earthquake Fault. The Facility's Permit Application states that the Facility is not within 3,000 feet of an active earthquake fault which has displacement during the Holocene era, defined as the last approximately 11,000 years [California Code of Regulations, title 22, section 66270.14(b)(11)(A)].

Major earthquakes were recorded for the region in 1812, 1857, 1933, 1971, and 1987. The major earthquake in 1812 caused damage at Mission San Gabriel located 12 miles west of the site. The 1933 major earthquake was a magnitude 6.3 and it was centered near Long Beach on the Newport-Inglewood fault. The fault nearest to the site is the Duarte Fault, which lies 1.5 miles north of the site. Other faults near the site include:

a. Raymond Hill – 4 miles northwest
b. Whittier – 10 miles south
c. Cucamonga – 10 miles east
d. San Jacinto – 20 miles northeast
e. San Andreas – 22 miles northeast

The Facility structures are required to be built to withstand seismic events without catastrophic failure. All units handling hazardous waste (treatment, storage, and transfer) are required to have secondary containment to contain spills. These containment structures would also contain spillage as the result of a seismic event. All new units constructed as part of this Permit will be built to withstand seismic events and will have the requisite secondary containment to contain spills.

DTSC reviewed the 2010 Fault Activity Map (FAM) of California, published by the California Department of Conservation, California Geological Survey. The 2010 FAM indicates that the Raymond Hill Fault and the Whittier Fault are Holocene faults (displacement within 700,000 years). The FAM also shows a Quaternary fault (age undifferentiated) called the Walnut Creek Fault running NE-SW, and located approximately 6 miles southeast of the Facility. The 2010 FAM does not show any Historic Faults (displacement within 200 year) near the Facility. (The 2010 Fault Activity Map can be viewed at http://www.quake.ca.gov/gmaps/FAM/faultactivitymap.html)

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis:

The proposed project includes the construction of five units on areas already paved. Although the pavement will be removed and some underlying soil may be graded, the construction will not result in the substantial loss of topsoil. Pavement, concrete slab and/or a structure will replace any exposed soil and, therefore, will prevent any soil erosion.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Impact Analysis:

The site is located within the Transverse Ranges, which consists of pre-Cambrian crystalline rocks, Mesozoic plutonic and metamorphic rocks, with a discontinuous veneer of tertiary and quaternary sediments. The site is located on the alluvial fan derived from the deposition of material transported from the interior of the San Gabriel Mountains by the San Gabriel River, outwash, and debris flows. The soils under the site are coarse sand and gravels with boulders interbedded with silty sand and gravel. No reports were found indicating the site is located on expansive soils. The site is underlain by gravelly sands and boulders, which are not characteristic of the properties of expansive soils. Additionally, review of the State of California Seismic Hazard Zones indicates that the site is not within an area of soil liquefaction or an area prone to landslide. Therefore, the site is unlikely to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslides, lateral spreading, subsidence, liquefaction or collapse.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact Analysis:

No reports were found indicating the site is located on expansive soils. The site is underlain by gravelly sands and boulders, which are not characteristic of the properties of expansive soils. Additionally, review of the State of California Seismic Hazard Zones indicates that the site is not within an area of soil liquefaction or an area prone to landslide.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.

Impact Analysis:

Municipal wastewater from the site is discharged to a sanitary sewer. Storm water from the site that has the potential for contacting wastes is contained on site and sent to a water treatment/recycling Facility. Storm water that does not have the potential to contact stored wastes is discharged to the local storm water system under a General Industrial Stormwater Discharge Permit from the State Water Resource Control Board. Construction of a septic tank is not anticipated for this project.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).

Impact Analysis:

According to the California Department of Conservation, the project is not located in an area containing naturally occurring asbestos.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *Irwindale General Plan Update, June 2008.*
- *Target Store Redevelopment Project, Draft Environmental Impact Report, June 9, 2008, Section 4.4 (Geology, Soils, and Seismicity).*
- *A General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos, dated August 2000, by California Department of Conservation, Division of Mines and Geology.*
- *California Department of Conservation website at www.conservation.ca.gov/cgs/rghm/ap/.*
- *2010 Fault Activity Map (FAM) of California, published by California Department of Conservation, California Geological Survey. [The 2010 Fault Activity Map can be viewed at http://www.quake.ca.gov/gmaps/FAM/faultactivitymap.html]*

7. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction and/or establishment of 5 new units

Description of Baseline Environmental Conditions:

The City of Irwindale General Plan was examined to determine if the City has an adopted Greenhouse Gas (GHG) Reduction Plan. In order to be used for analytical purposes under the requirements of CEQA and the State CEQA Guidelines for GHG emission impacts, a GHG reduction plan must, at a minimum, comply with Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006 (Nunez, 2006). The Irwindale General Plan does not contain a GHG Reduction Plan.

Next, and in the absence of an adopted GHG Reduction Plan, DTSC next followed the South Coast Air Quality Management District's (SCAQMD) tiered GHG significance threshold approach for stationary sources for the purpose of determining whether or not GHG emissions from the proposed Project are significant. Under this approach, project emissions that should be analyzed include direct, indirect, and, to the extent information is available, life cycle emissions during construction and operation. According to the SCAQMD, construction emissions should be amortized over the life of the project, defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier. The following describes the basic structure of the SCAQMD tiered approach:

- Tier 1 – consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA. If the project qualifies for an exemption, no further action is required. If the project does not qualify for an

exemption, then the analysis should move to the next tier.

- Tier 2 – consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines sections 15064(h)(3), 15125(d), or 15152(a). The GHG reduction plan must, at a minimum, comply with AB 32 GHG reduction goals; include emissions estimates agreed upon by either CARB or the AQMD, have been analyzed under CEQA, and have a certified Final CEQA document. Further, the GHG reduction plan must include a GHG emissions inventory tracking mechanism; process to monitor progress in achieving GHG emission reduction targets, and a commitment to remedy the excess emissions if GHG reduction goals are not met (enforcement).

  If the proposed project is consistent with the qualifying local GHG reduction plan, its impacts are not significant for GHG emissions. If the project is not consistent with a local GHG reduction plan, there is no approved plan, or the GHG reduction plan does not include all of the components described above, the project should move to Tier 3.

- Tier 3 **–** establishes a screening significance threshold level to determine significance using a 90 percent emission capture rate approach.

  The 90 percent capture rate GHG significance screening level in Tier 3 for stationary sources was derived using the following methodology. Using SCAQMD's Annual Emission Reporting (AER) Program, staff compiled reported annual natural gas consumption for 1,297 permitted facilities for 2006 through 2007 and rank-ordered the facilities to estimate the 90th percentile of the cumulative natural gas usage for all permitted facilities. Approximately 10 percent of facilities evaluated comprise more than 90 percent of the total natural gas consumption, which corresponds to 10,000 metric tons of CO2 equivalent emissions per year (MTCO2eq/yr) (the majority of combustions emissions are comprised of CO2). This value represents a boiler with a rating of approximately 27 million British thermal units per hour (Btu/ hour) of heat input, operating at an 80 percent capacity factor. It should be noted that this analysis did not include other possible GHG pollutants such as methane, N2O; a life-cycle analysis; mobile sources; or indirect electricity consumption.

Based on a review of the above, DTSC determined that the Tier 3 option should be used for determining whether or not GHG emissions from the proposed Project are significant.

Analysis as to whether or not project activities would:

a. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact Analysis:

Current Facility operations generate approximately 4,007 MT CO2e/yr of GHG emissions. Proposed Facility expansions beyond current operations will generate approximately 280 MT CO2e/yr of additional GHG emissions. The combined total 4,287 MT CO2e/yr of GHG emissions falls below the 10,000 MT CO2e/yr threshold of significance for GHG emission established by the SCAQMD in Tier 3 discussed above. Therefore, the proposed project is not expected to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment as defined by the SCAQMD. Also see analysis contained in subsection *3.* AIR QUALITY above.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Impact Analysis:

The applicable plan is the SCAQMD Final 2007 Air Quality Management Plan (AQMP) that is designed to meet both state and federal Clean Air Act planning requirements for all areas under AQMD jurisdiction, including the South Coast Air Basin (Los Angeles County, Orange County, San Bernardino County and Riverside County) and the Riverside County portion of the Salton Sea Air Basin (including the Coachella Valley). This AQMP focuses on ozone

and PM2.5. The AQMP also incorporates significant new scientific data, emission inventories, ambient measurements, control strategies, and air quality modeling. The Final 2007 AQMP was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG). The Final 2007 AQMP was adopted by the SCAQMD Governing Board on June 1, 2007.

The applicable policy is the SCAQMD's GHG policy, which is to reduce GHG emissions to stabilize climate change. As part of this policy, the SCAQMD established performance standards and target GHG reduction objectives that will ultimately contribute to reducing GHG emissions. Further, the SCAQMD policy is to also fully implement the Governor's Executive Order S-3-05 to reduce GHG emissions 80 percent below 1990 levels or 90 percent below current levels by 2050. Achieving the Governor's Executive Order objective would allow the SCAQMD to contribute to worldwide efforts to cap GHG concentrations at 450 ppm, thus, stabilizing global climate change.

This Project is consistent with the SCAQMD's policy and the Governor's Executive Order because the Project has been designed to ensure that operational, construction, and electricity-related GHG emissions are below the SCAQMD's GHG thresholds.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

- *Irwindale General Plan Update, June 2008.*
- *California Climate Action Registry General Reporting Protocol, version 3.1 dated January 2009 (GRP), which provides general principles for GHG inventories.*
- *SCAQMD - CEQA Air Quality Handbook, 1993, which established on and off-road vehicle emissions factors.*
- *Additional Air Quality Project Information, Proposed CleanTech Environmental Inc., TSDF Facility, Chemical Consultants, October 12, 2011.*
- *SCAQMD Final 2007 Air Quality Management Plan.*
- Governor's Executive Order S-3-05: *http://gov.ca.gov/executive-order/1861/*
- Technical Advisory: CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review, June 2008, *Office of Planning & Research: http://opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf.*

8. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction of 5 new units

Description of Baseline Environmental Conditions:

CleanTech is currently a fully licensed hazardous waste transporter. No activities requiring a hazardous waste facility permit is being conducted at the site. If approved the Permit would allow CleanTech to construct and operate a used oil recycling facility. The Facility's operations will consist of collecting used oil, waste antifreeze, non-RCRA wastewater, and oil-contaminated solid waste from offsite generators (gas stations, oil changers, auto repair shops, etc.) and consolidating the waste in tanks. The used oil will be treated by blending, gravity separation, and by adding a chemical reagent if necessary, to remove metals and enhance dehydration, to meet the recycled oil standards. The Facility will then certify the treated used oil as "recycled oil."

The Facility will also collect drums of used oil, waste antifreeze, and non-RCRA wastewater and stores them in a drum storage area. The liquid waste in containers may then be pumped into the appropriate storage/treatment tanks. Additionally, the Facility collects drums of solid waste include including solid waste contaminated with oil, oil/water

separation sludge, contaminated soil with oil, contaminated containers, etc., and places the drums into the drum storage area.

Consolidated waste antifreeze, non-RCRA wastewater, and oil-contaminated solid waste are shipped offsite to a recycling, treatment, or disposal facility.

The proposed CleanTech Environmental, Inc. facility will be built on a 42,508 square feet (0.98 acre) site located in the City of Irwindale, Los Angeles County, California. The proposed facility will have five (5) permitted units within 2 process area: Process Area 1 and Process Area 2. Both process areas are located within a warehouse building. The 5 permitted units are and described below:

1. Drum Storage Area
2. Multi-compartment Tank
3. Tank Storage and Treatment Area
4. Holding Tank
5. Loading/Unloading Area

Used oil, waste antifreeze, and non-RCRA wastewater are brought to the Facility in tanker trucks and unloaded into the appropriate tanks. The used oil may then be treated by blending, gravity separation, precipitation and/or dehydration to meet recycled oil purity standards in Health and Safety Code section 25250.1(a)(3). Used oil meeting the purity standards shall be recorded into the operating record. The tank is locked down. No additional used oil shall be pumped into the tank. Treated used oil that cannot meet the purity standards is managed as used oil.

Used oil, waste antifreeze, non-RCRA wastewater, and solids contaminated with oil may also be brought to the facility in drums. These drums are segregated into the type of wastes in the drums and placed into the Drum Storage Area. Drums of used oil, waste antifreeze, and non-RCRA wastewater may be pumped into the appropriate tanks.

The Facility will have a total tank capacity of 187,000 gallons and a total container storage capacity of 56,240 gallons inclusive of all drums, totes, bags, and the roll-of bin.

The Facility will be in an area zoned for heavy industry use. There are no residential areas in the area around this industrial zone. Transportation uses well established routes through industrial, manufacture or commercial areas.

Analysis as to whether or not project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

Impact Analysis:

All personnel at CleanTech go through emergency training to minimize the risk of exposure to themselves and the public from potential spills from tanker trucks. All transporters are required to maintain proper documentation of hazardous waste when whether transporting to or from the facility. To operate in California, all hazardous waste transporters must be registered with the Department of Toxic Substances Control. Unless specifically exempted, hazardous waste transporters must comply with the California Highway Patrol Regulations; the California State Fire Marshal Regulations; and the United States Department of Transportation Regulations. According to title 22, CCR 66263, all hazardous waste transporters must have liability insurance and comply with random inspections by the Department of California Highway Patrol and the Department of Toxic Substances Control (DTSC).

DTSC concludes that the project will create a less than significant impact to the public and environment through the routine transport, use or disposal of hazardous materials.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Analysis:

The most significant reasonably foreseeable accident would be a spill from a tanker truck or any of the containers in the facility. Design and operational measures such as berms will be constructed on the facility so that if there was a spill, it would be contained within the facility. Because of the constructed prevention measures in place, used oil, oil-related wastes, and used antifreeze should not run off the facility into the surrounding environment. Personnel at CleanTech are trained in emergency procedures to contain spills and to call for help if the situation were to get out of hand. Both used oil and used antifreeze have a low volatility so air emissions from the waste would be minimal. CleanTech also has a Contingency Plan in place that outlines the emergency procedures that should be followed in the event of a release.

The second most significant reasonably foreseeable accident would be a fire. This becomes possible when the temperature reaches the used oil flash point. The flash point is defined as the lowest temperature at which a liquid gives off enough vapor to form an ignitable mixture with air and burn when a source of ignition (sparks, open flames, cigarettes, etc.) is present. Used oil has a flashpoint of approximate 400 ^{o}F which if fairly high. Therefore, the possibility of a fire starting without an external source is minimal.

Fire extinguishers are present throughout the facility and the Los Angeles County Fire Department will respond to a first alarm with appropriate equipment and personnel. CleanTech does not store flammable liquids in buildings or under roofs except for small quantities of lab chemicals and samples. CleanTech personnel will be trained to correctly handle the hazardous waste during unloading/loading and transportation within the facility so the risk of fire should be low.

DTSC concludes that the project will create a less than significant impact to the public and environment through the routine transport, use or disposal of hazardous wastes.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

Impact Analysis:

The nearest schools are Mountain View Elementary School, located 201 North Vernon Avenue in Azusa, which is approximately 1.2 miles northeast of the facility and Valleydale Elementary School, located at 700 South Lark Ellen Avenue in Azusa, which is approximately 1.5 miles southeast of the facility.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.

Impact Analysis:

The Facility is not on a list of hazardous materials sites pursuant to Government Code Section 65962.5.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis:

CleanTech is a new facility. There will be no construction outside of the facility's site boundaries. DTSC requires CleanTech to have a contingency plan according to what is written in title 22, CCR 66264.56. When there is an emergency, the Emergency Coordinator will implement the contingency plan and notify the State Office of Emergency Services. There is an alarm system that will sound in the case of an emergency. A copy of the contingency plan will remain at the facility, and be given to all local police departments, fire departments, hospitals, the Department of Toxic Substances Control, and State and local emergency response teams.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used

- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm*

9. Hydrology and Water Quality

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction and/or establishment of 5 new units

Description of Baseline Environmental Conditions:

The entire facility will be located within a warehouse building to prevent rain from entering any hazardous waste management units. In additional, all authorized treatment and storage areas are required to have secondary containment to contain unintentional spillage. Any washwater (from cleaning the outside of the tanks, secondary containment system, and driveways) will be collected and pumped into the non-RCRA wastewater tank. The wastewater will then be shipped to an authorized offsite treatment or disposal facility. If, in the future, CleanTech does want to discharge into the sewer system, CleanTech will apply to both Public Works and the Los Angeles County Sanitation Districts for an industrial wastewater discharge permit.

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements.

Impact Analysis:

The Facility will not discharge any wastewater. Therefore, the project will not violate any water quality standards or waste discharge requirements.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which Permits have been granted).

Impact Analysis:

The San Gabriel Canyon Basin aquifer underlies the site. The project neither extracts nor injects groundwater. Therefore, the project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficiency in aquifer volume or a lowering of the local groundwater table.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.

Impact Analysis:

The site is located adjacent to the northeast corner of the Santa Fe Flood Control Basin for the San Gabriel River. The Facility operations and storm water management are conducted in accordance with the Storm Water Pollution Prevention Plan for industrial storm water discharges. The entire site is bermed to prevent release of contaminated water or storm water offsite. The storm water typically runs off the City of Irwindale's storm water sewer system. In addition, all operations will be performed inside a warehouse building.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Impact Analysis:

This project is not anticipated to alter the existing drainage pattern, or substantially increase the rate of runoff of the site or area, including through the alteration of the course of a stream or river. Please also see response to subsection (c).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

Impact Analysis:

Please see responses to subsections (a), (b), (c) and (d).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis:

Please see response to subsection (b) above.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

g. Place within a 100-flood hazard area structures which would impede or redirect flood flows.

Impact Analysis:

The Facility is located within 0.25 miles northeast of the Santa Fe Dam Recreation Area. The dam retains and controls runoff within a flood control basin, thereby protecting the surrounding areas from flooding. The maximum recorded amount of water storage occurred in 1969, when the dam was 40% full. The Federal Emergency Management Agency (FEMA) classifies the area surround the Santa Fe Dam as Zone D, which is defined as an “area of undetermined, but possible flood hazard.

A letter from the Los Angeles County Flood Control District dated December 20, 1982, documents that the neighboring Veolia site (about 200 feet east of the CleanTech Facility) is "reasonably free of flood hazard from major channels and streams, but may be subject to local flood hazard". Therefore, it can be assumed that CleanTech Facility will also be reasonably free of flood hazard from major channels and stream, but may be subject to local flood hazard.

Flood Insurance Rate Maps have been developed for the geographic area that includes the CleanTech Facility. (Reference: Los Angeles County, map 06037C1700F, Panel 1700 of 2350, September 26, 2008). The map shows that the CleanTech Facility is not within an area designated a 100-year floodplain. The CleanTech Facility is within an area identified as “Zone X” and outside the area designated as 0.2% annual chance of flood.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis:

Please see response to subsection (c) above.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

i. Inundation by seiche, tsunami or mudflow.

Impact Analysis:

The site is located on an alluvial fan with topographic elevations falling away from the site toward the San Gabriel River basin. The Santa Fe Basin pool surface, at range of elevations between 423 and 473-ft AMSL, is normally much lower than the site. The topographic elevations at the site range from about 525 ft AMSL to 516 ft AMSL. During maximum flood pool elevation, 513 ft AMSL, water escaping the Santa Fe Basin would be expected to flow down topographic gradient into the San Gabriel River, away from the site. The site is 30 miles from the ocean and 5 miles from the San Gabriel Mountains and does not appear to be in the path of either tsunami or mudflows.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *USACE, 1985, Upstream Reservoir Inundation and Immediate Spillway Map Plate 1, Attachment 6.*
- *Irwindale General Plan Update, June 2008, Section 4: Infrastructure Element.*

10. Land Use and Planning

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

The Facility is located in the City of Irwindale. The eastern boundary of the Facility is approximately 10 feet from the borderline of the City of Azusa at Peckham Road. The area is zoned industrial and surrounded in an area zoned industrial and commercial, consistent with the City of Irwindale General Plan and the City of Azusa General Plan.

The proposed project allows the construction of a hazardous waste facility consisting of five storage and/or treatment units. The Facility will be constructed within a warehouse building. All construction will take place on the Facility grounds and will be consistent with the established industrial and commercial zoning characteristics of the project site area, therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *Irwindale General Plan Update, June 2008.*
- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *Zoning Verification Letter, 5820 Martin Road, Irwindale, CA 91706, Brandi M. Jones, Associate Planner, City of Irwindale.*

11. Mineral Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

This section is not applicable to the proposed Permit Issuance and related activities, no mineral resources have been found on the Facility site, therefore no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

12. Noise

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction and/or establishment of 5 new units

Description of Baseline Environmental Conditions:

The City of Irwindale General Plan Update – Public Safety Element establishes policies relative to the reduction and mitigation of natural and manmade hazards, such as noise, that must be considered in future planning and decision-making (City of Irwindale, 2008). The City's policies related to noise issues stress the importance of protecting residents from excessive noise and reducing the high levels of noise exposure associated with the existing development and transportation facilities in the City. Specific policies include:

- Safety Element Policy 5. The City of Irwindale will work towards reducing noise exposure in the City by considering noise and land use compatibility in land use planning.

- Safety Element Policy 6. The City of Irwindale will continue to investigate strategies that will be effective in reducing the community's exposure to harmful noise levels.

The City's General Plan recognizes the State Office of Noise Control's Guidelines for the Preparation and Content of Noise Elements of General Plans, which is a guide for compatibility of noise-sensitive land uses in areas subject to noise levels of 55 to 80 dB CNEL or Ldn. Residential uses are normally unacceptable in areas exceeding 70 dB CNEL; and conditionally acceptable between 55-70 dB CNEL for low-density single-family dwelling units, duplexes, and mobile homes, and between 60-70 dB CNEL for multiple-family units. Schools, libraries, hospitals, and nursing homes are treated as noise-sensitive land uses, requiring acoustical studies within areas exceeding 60 dB CNEL. Commercial/professional office buildings and industrial land uses are normally unacceptable in areas exceeding 75 dB CNEL, and are conditionally acceptable within 67 to 78 dB CNEL (for commercial and professional offices only). While the City's General Plan does not specifically acknowledge the State's noise guidelines for playgrounds and neighborhood parks, these land uses are normally unacceptable in areas exceeding 70 dB CNEL, and are clearly unacceptable in areas exceeding 75 dB CNEL.

The City of Irwindale regulates noise through enforcement of its noise ordinance, Irwindale Municipal Code (IMC) Chapter 9.28 Noise Regulation (City of Irwindale, 2009). Per IMC Section 9.28.110 states it is unlawful for any person within a residential zone, or within a radius of five hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic hammer, derrick, steam or electric hoist or other construction type device on a development requiring a city permit, in such a manner that noise is produced which would exceed the ambient or the ambient base noise level by more than five (5) dBA when measured at any boundary line of the property from which the noise emanates, unless beforehand authorization therefore has been duly obtained from the building inspector. Such activity is unlawful without a permit during all hours on Sunday and construction is limited to seven (7) a.m. to seven (7) p.m.

CITY OF IRWINDALE AMBIENT BASE NOISE LEVELS		
Zone	**10 p.m. to 7 a.m.**	**7 a.m. to 10 p.m.**
Residential	45 dBA	50 dBA
Commercial	50 dBA	55 dBA
Industrial	60 dBA	70 dBA
Source: Irwindale Municipal Code, Chapter 9.28.030, http://irwindale.ca.us/municipal_code/		

Per IMC Section 9.28.120, the noise level from industrial plants shall not exceed the ambient or the ambient base level by more than five (5) dBA when measured at any boundary line of the property from which the noise emanates, except as may be specifically authorized by permit from the city.

The CleanTech Environmental Facility is located in a manufacturing area. Noise levels in a manufacturer/industrial area are generally 65 to 75 dBA.

Analysis as to whether or not project activities would:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis:

Within the CleanTech Facility, the primary sources of noise are the incoming and outgoing tanker trucks, noise from the pumps when loading liquid waste to tanks, and the unloading and loading of containers. The operating hours of the facility are 6 am to 6 pm Monday to Saturday. The loading and unloading of waste and the pumping of waste into

the tanks will only be limited in duration. There will not be constant unloading and unloading and pumping done from 6 am to 6 pm. The noise level from the pumps is estimated to be similar to that of compressors found other manufacturing and industrial facilities. Noise levels of the compressors used at nearby companies are estimated to be approximately 64 dBA at an operating distance of 140 feet. This noise will only be temporary. The incoming and outgoing of tanker trucks will happen throughout the day but this noise is also limited in duration. There will not be a constant coming and going, to and from, the facility for all hours during operation. The noise from trucks will be no greater than trucks traveling on Martin Road to First Street or any other major route of traffic within the city.

Noise from the construction of the facility will only be short term. Construction will come in the form of repaving the foundation of the storage and treatment tank areas and the container storage areas, installing the tanks, constructing berms, installing fencing, and laying asphalt. The City of Irwindale noise ordinance regulates the noise from construction by constricting the times when construction may occur, 7 am to 7 pm, making the impact of noise from construction less than significant.

This project will not expose persons and will not generate noise levels in excess of the City of Irwindale noise ordinance.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

Impact Analysis:

The general operation of the CleanTech doesn't involve any excessive groundbourne vibration or groundbourne noise levels. These noises will only occur during the construction of the facility but this noise will only be short term and happen during the designated hours according to the City of Irwindale Noise Ordinance.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Impact Analysis:

As noted above in the Land Use section, the area in and around the proposed project site is zoned Heavy Manufacturing/Industrial. As noted in subsection (a) of this section, general noise levels in the vicinity of the Facility fall within 65 - 75dBA. The primary sources of noise coming from the daily operation of the facility will come during the coming and going of tanker trucks and during the transfer of the hazardous waste to the facility. It will take a maximum of 15 minutes to pump liquid waste from a tanker truck to a storage tank. Since the Facility is located within a warehouse building, noise from the pump will be attenuated. Noise from the trucks coming and entering the Facility will not be any louder than trucks traveling on Martin Road, First Street, or any other busy street. The noise from these operations will only last short term. The noise from the construction of the facility is also temporary and construction hours will follow that in the City of Irwindale Noise Ordinance.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact Analysis:

See a, b, and c above.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *Irwindale General Plan Update, June 2008, Section 6: Public Safety.*
- *Irwindale Materials Recovery Facility and Transfer Station Project Draft EIR, July 2009, Chapter 3.8.*

13. Population and Housing

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

This section is not applicable to the proposed Permit and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

a. Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

14. Public Services

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction of 5 new units

Description of Baseline Environmental Conditions:

- ❖ Fire protection: Los Angeles County Fire Station 48 is located 1.6 miles south of the site.
- ❖ Police protection: The Facility will have full-time surveillance on a 24/7 basis. The Irwindale Police Department is responsible for hazardous materials incidents and traffic control in the vicinity of the site. Since the Facility borders the City of Azusa, the Azusa Police Department will handle traffic control within the City of Azusa near the facility.
- ❖ Schools: The school nearest to the Facility is Mountain View Elementary School, located at 201 Vernon Avenue. It is approximately 1.2 miles east of the Facility.
- ❖ Parks: The Santa Fe Dam Recreational Park is located less than a mile west of the site.
- ❖ Other public facilities: A civic center is located about a mile southeast of the site.

Analysis as to whether or not project activities would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

Impact Analysis:

- ❖ Fire/ Police Protection: the proposed project will not require additional fire or police protection services beyond those currently existing and, therefore, will not impact existing fire or police ratios, response times or other performance objectives.
- ❖ Schools/Parks/Other Public Facilities: the proposed project will not result in an increase in the existing employee workforce that otherwise may have necessitated the construction of additional schools, parks, or other public facilities.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *Irwindale General Plan Update, June 2008, Section 6, Public Safety.*

15. Recreation

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

The Santa Fe Dam Recreational Area is located across North Irwindale Avenue from the Facility. The 6+-lane thoroughfare provides a significant physical barrier from the Facility.

Analysis as to whether or not project activities would:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Analysis:

The proposed project will not result in a substantial increase in the existing employee workforce. Consequently, there would not be an increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis:

The proposed project will not include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *Irwindale General Plan Update, June 2008, Section 5: Resource Management Element.*

16. Transportation and Traffic

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction of 5 new units

Description of Baseline Environmental Conditions:

CleanTech's operations utilize Martin Road for access and egress. Trucks must access the facility from Martin Road. A truck can enter the area from one of the two directions. The primary direction for reaching the proposed facility will be from exiting the 210 Freeway, from either the east or west, using the Irwindale Avenue off ramp. The truck will then proceed south approximately 1 ¾ miles to First Street. At this light the truck will turn right and then proceed approximately ¼ mile to Martin Road and stay to the left. Note that First Street turns into Martin Road. The Facility is located approximately 1/8 of a mile on the left. Trucks will enter the facility through Martin Road main gate which will be equipped with an automatic gate and keypad system.

The Level of Service for North Irwindale Avenue between First Street and Gladstone Street is identified as Level D. Level D borders on a range in which small increases in flow may cause substantial increases in delay and decreases in travel time. However, no changes in traffic flows are anticipated because truck and vehicular trips will remain at or close to the present level.

The estimated maximum number of waste transport vehicles that presently access the Facility is approximately 12 vehicles per day. CleanTech requires that trucks schedule arrival times with the Facility to space out delivers and pickups, which also has the effect of minimizing traffic congestion. Approximately 1 to 3 trucks enter the Facility every hour over the course of an 8-hour period.

Analysis as to whether or not project activities would:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

   Impact Analysis:

   CleanTech is located in an industrial area with streets designed for industrial (large truck) traffic. There are no residential areas nearby the Facility and, therefore, no residential traffic impacts are anticipated. The 210 and 605 Freeways are close by and are used by truck traffic.

   CleanTech's operations uses Martin Road for access and egress. Martin Road turns into First Street. The total traffic load on First Street is expected to continue at the present level and will be within the trip generation limits of the Facility's Permits. The design capacity of West First Street is 16,000 average daily traffic (ADT) volume.

   The estimated maximum number of waste vehicles that presently access the Facility is approximately 12 vehicles per day.

   CleanTech requires that the trucks schedule arrival times with the Facility. The most likely scenario would be for 1 to 3 trucks to enter the Facility every hour over the course of an 8-hour period. This is a relatively small proportion of traffic for this industrial area.

   If approved, the project will increase the maximum number of truck trips to the Facility from 12 to 30. This increase in truck traffic is not expected to significantly increase the daily traffic flow.

   If approved, the project would allow construction of the Facility. A summary of the construction is provided in Section 3.a above, and includes an estimation of construction vehicles to be utilized during the construction period. The increase in traffic due to construction is temporary and not expected to significantly impact the traffic flow of volume for the reasons cited in this section and in Section 3.a.

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☒ Less Than Significant Impact
   ☐ No Impact

b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

Impact Analysis:

As noted in the Environmental Setting, the Level of Service for North Irwindale Avenue between First Street and Gladstone Street is identified as Level D. Level D borders on a range in which small increases in flow may cause substantial increases in delay and decreases in travel time.

If approved, the project will increase the maximum vehicle traffic to the Facility. This increase in vehicle truck traffic is not expected to significantly increase the daily traffic flow because there will be only small increase in the number of vehicles.

If approved, the project would allow construction of the Facility. A summary of the construction is provided in Section 3.a above, and includes an estimation of construction vehicles. The increase in traffic due to construction is temporary and not expected to significantly impact the traffic flow of volume. It is possible, however, for a temporary traffic congestion to occur if construction trucks arrive with operation trucks. CleanTech will modify its operations schedule during construction to minimize traffic congestion.

The total traffic load on First Street is expected to continue at the present level and will be within the trip generation limits of the Facility's permits.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis:

The intersection of First Street and North Irwindale Avenue is near the site. No highway ramps, sharp curves or other immediately dangerous traffic conditions are at or in the vicinity of the site. The nearest freeway ramp is the ramp to Interstate 210 which is approximately 1¾ away. Intersection improvements have been made and dedicated turning lanes have improved traffic congestion.

The project will not alter the outside traffic approach to or from facility. The project will not significantly alter the traffic pattern within the facility.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Result in inadequate emergency access.

Impact Analysis:

According to CleanTech's Contingency Plan, there is only one gate exit for emergency evacuation. This gate is designed to allow large truck traffic to enter and exit the Facility. Since the site is only 0.98 acres, this access gate is adequate. The Facility has adequate emergency access that would not be changed if the project is approved.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in inadequate parking capacity.

Impact Analysis:

Parking spaces for employees are provided within the Facility's property. These spaces (over 10) are sufficient to allow for employee and visitor parking, trucks waiting for unloading wastes, and trucks being unloaded. The project will not decrease the amount of parking available for employees.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis:

The project would not impact policies, plans, or programs supporting alternative transportation.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *Irwindale General Plan Update, June 2008, Section 4: Infrastructure Element.*

17. Utilities and Service Systems

Project Activities Likely to Create an Impact:

- Receive
- Store
- Treat
- Recycle
- Transfer
- Construction of 5 new units

Description of Baseline Environmental Conditions:

The Facility currently does not discharge any water to the sewers. If approved, the Facility will apply for a Storm Water Discharge Permit from the Los Angeles Regional Water Quality Control Board (RWQCB). Any wastewater discharged to the sewer will be tested to ensure it means the standards set by the RWQCB.

Analysis as to whether or not project activities would:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact Analysis:

If approved, the Facility will apply for a Storm Water Discharge Permit from the Los Angeles Regional Water Quality Control Board (RWQCB). Any wastewater discharged to the sewer will be tested to ensure it means the standards set by the RWQCB to be consistent with the discharge limits of the permit.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

The proposed Facility will not result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. If approved, the Facility will apply for a Storm Water Discharge Permit from the Los Angeles Regional Water Quality Control Board (RWQCB). Any wastewater discharged to the sewer will be tested to ensure it means the standards set by the RWQCB.

Water from containment areas is collected and pumped into a holding tank, tested to determine if it is hazardous, and either released to the POTW in accordance with permit discharge limits or disposed of offsite as hazardous waste. No wastewater will be treated at the Facility.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

The proposed Facility will not result in the construction of new storm water drainage facilities or expansion of existing facilities. If approved, the Facility will apply for a Storm Water Discharge Permit from the Los Angeles Regional Water Quality Control Board (RWQCB). Any wastewater discharged to the sewer will be tested to ensure it means the standards set by the RWQCB.

Water from containment areas is collected and pumped into a holding tank, tested to determine if it is hazardous, and either released to the POTW in accordance with permit discharge limits or disposed of offsite as hazardous waste.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact Analysis:

The Permittee has estimated that the additional activities would result in an increase of water usage of approximately 500 gallons per month.

The Azusa Light and Water Department will be able to support the increase of water usage of approximately 500 gallons per month.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis:

If approved, the Facility will apply for a Storm Water Discharge Permit from the Los Angeles Regional Water Quality Control Board (RWQCB). Any wastewater discharged to the sewer will be tested to ensure it means the standards set by the RWQCB.

Water from containment areas is collected and pumped into a holding tank, tested to determine if it is hazardous, and either released to the POTW in accordance with permit discharge limits or disposed of offsite as hazardous waste. No wastewater will be treated at the Facility. The project will not result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis:

The main operation at the Facility is to recycle hazardous wastes. The Facility utilizes the Azusa Land Reclamation Landfill which has sufficient permitted capacity for disposal of current hazardous waste generated by the Facility. If approved, the project is not expected to increase the amount of waste to be disposed in a landfill.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

g. Comply with federal, state, and local statutes and regulations related to solid waste.

Impact Analysis:

The project involves the issuance of a hazardous waste facility permit that will allow the Facility to construct and operate in compliance with federal and state statutes and regulations concerning hazardous waste.

None of the activities allowed by this project are anticipated to conflict with federal, state and/or local statutes and regulations related to solid waste. The Hazardous Waste Facility Permit specifically states that the Facility must comply with all environmental statutes and regulations.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

- *CleanTech Environmental Inc. Full non-RCRA Permit Application, October 17, 2011.*
- *Irwindale General Plan Update, June 2008, Section 4: Infrastructure Element.*

Mandatory Findings of Significance

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project ☐ has ☒ does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b. The project ☐ has ☒ does not have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

c. The project ☐ has ☒ does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Determination of Appropriate Environmental Document:

Based on evidence provided in this Initial Study, DTSC makes the following determination:

☒ The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.

☐ The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

☐ The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

☐ The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

☐ The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

Certification:

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Preparer's Signature		Date
Alfred Wong	Senior Hazardous Substances Engineer	(510) 540-3946
Preparer's Name	Preparer's Title	Phone Number

ATTACHEMENT A

REFERENCES

- CleanTech Environmental Inc. Full non-RCRA Permit Application*, October 17October 17, 2011*.

- Final Environmental Impact Report, OSCO Proposed Phase 2 of Master Plan for Upgrading and Expansion of Solvent Recycling Facility in the City of Azusa, California, dated July 1990, SCH No. 89051709, prepared by the City of Azusa, California.

- USGS Urban Areas Aerial Photograph dated 3/29/2004.

- SCAQMD air quality information at website: http://www.aqmd.gov/smog/historicaldata.htm

- City of Azusa General Plan, Chapter 3: The Built Environment.

- City of Irwindale General Plan Update, June 2008.

- A General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos, dated August 2000, by California Department of Conservation, Division of Mines and Geology.

- Jane Strong, California Native Plant Society, San Gabriel Mountains Chapter.

- The Natural History of the Santa Fe Dam Recreation Area website: http://cnps-sgm.org/santafedam/index.html

- California Wildlife Habitat Relations System, California Department of Fish and Game

- *Natural Diversity Database*, California Department of Fish and Game, August 30, 2009.

- California Department of Conservation website at www.conservation.ca.gov/cgs/rghm/ap/.

- 2010 Fault Activity Map (FAM) of California, published by California Department of Conservation, California Geological Survey. [The 2010 Fault Activity Map can be viewed at http://www.quake.ca.gov/gmaps/FAM/faultactivitymap.html]

- Cortese List: *http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm*

- USACE, 1985, Upstream Reservoir Inundation and Immediate Spillway Map Plate 1, Attachment 6.

- Letter from the Native American Heritage Commission, dated November 8, 2011, Re: Sacred Lands File Search and Native American Contacts list for the “Proposed CleanTech Environmental RAP Project;” located in the City of Irwindale, Los Angeles County

AIR IMPACT CALCULATION TABLES

Table 1 – Baseline and Net Increase in Facility Operations Emissions

Pollutant	Current Baseline Emissions	Expected Increase Emissions	Totalized Emissions	SCAQMD Significance Thresholds	SCAQMD Localized Significance Thresholds
NOx (lbs/day)	8.70	5.80	14.50	55	161
PM10 (lbs/day)	1.41	2.10	3.51	150	4
PM2.5 (lbs/day)	1.20	1.79	2.99	55	2
Sox (lbs/day)	0.050	0.075	0.125	150	--
CO (lbs/day)	34,03	50.79	84.82	550	1,861
GHG Emissions (MT CO2e/yr)	406.7	652.3	1,059	10,000	--

Table 1 A – Totalized Current Baseline Facility GHG Emissions

Direct Mobile Emissions (MT CO_2e/yr)	389.8
Indirect Emissions (MT CO_2e/yr)	16.9
Total Estimated Current GHG Emissions (MT CO_2e/yr)	**406.7**
SCAQMD Significance Threshold (MT CO_2e/yr)	10,000
Percent of SCAQMD Threshold	4.1%

Notes:
CO_2 – Carbon Dioxide
CO_2e – Carbon Dioxide Equivalent
GHG – Greenhouse Gas
lb – pound
MT – metric tons
SCAQMD – South Coast Air Quality Management District
yr – year

Table 1B – Totalized Estimated Increase in GHG Emissions

Direct Mobile Emissions (MT CO_2e/yr)	584.7
Indirect Emissions (MT CO_2e/yr)	67.6
Total Estimated Current GHG Emissions (MT CO_2e/yr)	**652.3**
SCAQMD Significance Threshold (MT CO_2e/yr)	10,000
Percent of SCAQMD Threshold	6.51%

Notes:
CO_2 – Carbon Dioxide
CO_2e – Carbon Dioxide Equivalent
GHG – Greenhouse Gas
lb – pound
MT – metric tons
SCAQMD – South Coast Air Quality Management District
yr - year

Table 2A – Current Indirect GHG Emissions due to Current Facility Energy Demands

Energy Use (current)	MWh/y	CO_2 (lbs/MWh	CH_4 (lbs/MWh	N_2O (lbs/MWh	CO_2 (lbs/yr)	CH_4 as CO_2 (lbs/yr)	N_2O as CO_2 (lbs/yr)	Total CO_2e (MT/yr)
Electricity	46.3	804.54	0.0067	0.0037	37,250	0.31	0.17	**16.9**

Notes:
Energy use is based on the energy consumption for February 2010 to February 2011
Emissions Factors from California Climate Action registry General Reporting Protocol Version 3.1, January 2009
CH_4 as CO_2 (lbs) = CH_4 (lbs) *CH_4 Global Warming Potential (GWP)
CH_4 GWP = 21 lbs CO_2e / 1 lb CH_4
N_2O as CO2 (lbs) = N_2O (lbs) * N_2O Global Warming Potential (GWP)
N_2O GWP = 310 lbs CO_2e / 1 lb N_2O
MT = lbs * (1 MT / 2,204.6 lbs)

Table 2B – Estimated Increase in Indirect GHG Emissions due to Expected Energy Demands

Energy Use (projected)	MWh/yr	CO_2 (lbs/MWh)	CH_4 (lbs/MWh)	N_2O (lbs/MWh)	CO_2 (lbs/yr)	CH_4 as CO_2 (lbs/yr)	N_2O as CO_2 (lbs/yr)	Total CO_2e (MT/yr)
Electricity	185.2	804.54	0.0067	0.0037	148,993	1.24	0.68	**67.6**

Notes:
Base usage is multiplied times two since current operation is 12 hours per day or 92.6 MWh/yr
Estimated Energy use is based on a factor of 2 times the current energy usage
Emissions Factors from California Climate Action registry General Reporting Protocol Version 3.1, January 2009
CH_4 as CO_2 (lbs) = CH_4 (lbs) *CH_4 Global Warming Potential (GWP)
CH_4 GWP = 21 lbs CO_2e / 1 lb CH_4
N_2O as CO2 (lbs) = N_2O (lbs) * N_2O Global Warming Potential (GWP)
N_2O GWP = 310 lbs CO_2e / 1 lb N_2O
MT = lbs * (1 MT / 2,204.6 lbs)

Table 3A – Current Direct Mobile Combustion GHG Emissions

On-Road Vehicles	Quantity (#/day)	Roundtrip Distance (miles/truck)	CO_2 (lbs/mile)	CH_4 (lbs/mile)	CO_2 (lbs/yr)	CH_4 as CO_2 (lbs/yr)	Total CO_{2e} (MT/yr)
Transport Trucks	12	100	2.75	0.0001	858,564	742.7	**389.8**

Notes:
Emissions factors from SCAQMD http://www.aqmd.gov/ceqa/hdbk.html, Scenario Year 2011
Expected increase in truck traffic is 5 vehicles per day, Monday through Friday
CH_4 as CO_2 (lbs) = CH_4 (lbs) * CH_4 Global Warming Potential (GWP)
CH_4 GWP = 21 lbs CO_2e / 1 lb CH_4
MT = lbs * (1 MT / 2,204.6 lbs)

Table 3B – Estimated Increase in Direct Mobile Combustion GHG Emissions due to Increased Site Traffic

On-Road Vehicles	Quantity (#/day)	Roundtrip Distance (miles/truck)	CO_2 (lbs/mile)	CH_4 (lbs/mile)	CO_2 (lbs/yr)	CH_4 as CO_2 (lbs/yr)	Total CO_{2e} (MT/yr)
Transport Trucks	18	100	2.75	0.0001	1,287,846	1,114	**584.7**

Notes:
Emissions factors from SCAQMD http://www.aqmd.gov/ceqa/hdbk.html, Scenario Year 2011
Expected increase in truck traffic is 5 vehicles per day, Monday through Friday
CH_4 as CO_2 (lbs) = CH_4 (lbs) * CH_4 Global Warming Potential (GWP)
CH_4 GWP = 21 lbs CO_2e / 1 lb CH_4
MT = lbs * (1 MT / 2,204.6 lbs)

4, Expected Increase in Facility Emissions

Estimated Mass Daily Thresholds		
Pollutant	**Construction [a]**	**Operation [b]**
NOx	1.12 lbs/day	15.62 lbs/day
PM10	0.09 lbs/day	2.1 lbs/day
PM2.5	0.09 lbs/day	1.79 lbs/day
SOx	0.0023 lbs/day	0.075 lbs/day
CO	0.98 lbs/day	50.79 lbs/day

Notes:
a: Estimated Construction, based on 2 days during concrete pour.
b: Estimated Operations increase due to increase in truck traffic from 12 to 30 trucks per day