CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

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: Permit for D/K Environmental Hazardous Waste Transfer and Storage Facility (CAT080033681)		CALSTARS CODING: 30027450
PROJECT ADDRESS: 3650 E. 26th Street	CITY: Vernon	COUNTY: Los Angeles
PROJECT SPONSOR: D/K Environmental	CONTACT: Rosemary Domino	PHONE: (323) 268-3387

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

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

STATUTORY AUTHORITY:

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

DTSC PROGRAM/ ADDRESS:	CONTACT:	PHONE:
Treatment and Storage Team Department of Toxic Substances Control 8800 Cal Center Drive Sacramento, California 95826-3200	Farshad T. Vakili, P.E.	(916) 255-3612

PROJECT DESCRIPTION:

The issuance of a Hazardous Waste Facility Permit (Permit) for the D/K Environmental (DKE) Hazardous Waste Transfer and Storage Facility by the Department of Toxic Substances Control (DTSC), as authorized by the California Health and Safety Code, Chapter 6.5, and the Resource, Conservation and Recovery Act (RCRA). In January 2011, DKE submitted its permit request to continue its hazardous waste storage and transfer activities. Upon issuance of a RCRA permit, DKE will become a RCRA Permitted Facility for transfer and storage activities for RCRA, and California regulated waste received from off-site generators. Treatment, disposal, and recycling of hazardous wastes will not be performed at the site or at off-site units.

The DKE site for the proposed hazardous waste transfer and storage facility is located on East 26th Street near the northeast corner of the intersection of Downey Road and Bandini Boulevard in the incorporated City of Vernon, California. It is located in the metropolitan Los Angeles area in an area zoned by the City of Vernon General Plan as “Heavy Industry/Warehousing Transportation Related”. The site is surrounded by industrial, manufacturing, and transportation related facilities. Attachment B of this document contains a map of the site location.

The wastes that will be managed at the facility by D/K Environmental fall under the following seven categories:

1) Used Oil/Waste and Oil. Examples of this category include; used motor oils, transmission fluids, engine lubricating oils, hydraulic oils, compressors oils, gear oil, metal working oils, and oil spill cleanup.

2) Used Antifreeze (Glycols). Examples of this category include used antifreeze coolant and used glycols.

3) Oily Water. Examples of this category include water mixtures that have been contaminated with Used Oil / Waste Oil or Used Antifreeze (Glycols) including; rain water, spill cleanup, bilge water, clarifier cleanout, tank cleanout, and wastewaters from general maintenance activities.

4) Aqueous Solution. Examples of this category include water mixtures that have been contaminated with heavy metals and organics generated as by-products of wastewater treatment operations. Aqueous solutions containing halogenated and non-halogenated solvents.

5) RCRA Fuels Blend. Examples of this category include ignitable wastes from off-site transfer, storage, and disposal facilities (TSDF) waste consolidation, high halide oil, waste oil, paint related material, wastes, petroleum refining, liquids containing oxygenated or petroleum solvents.

6) RCRA and Non-RCRA Solids and Debris. Examples of this category include contaminated soil, contaminated absorbent, contaminated concrete, contaminated debris from site cleanup, spill cleanup, site investigations, closure activities and demolition. Tank bottoms, dirt, adsorbents, personnel protective equipment, trash, petroleum refining debris, and solids from general facility maintenance activities.

7) Polychlorinated biphenyls (PCB) Waste. Examples of this category include used oil/waste oil, oily water, tank or equipment decontamination rinsate solution contaminated with Toxic Substances Control Act (TSCA) and Non-TSCA levels of PCB.

The facility will not accept wastes that are biohazards, extremely hazardous, reactive, explosive, or wastes that are radioactive, dioxins or pesticides.

Project Activites

The project involves the issuance of a new RCRA hazardous waste permit, which will allow the facility to continue rail transfer activities under a consent order, HWCA 2004-0437, issued on January 2007, and operate a hazardous waste container storage unit. Below are the two Hazardous Waste Management Units (HWMU) from the proposed RCRA permit:

1. The Railcar /Truck Loading and Unloading Unit - Consists of one rail track: Track 3, rail track spill pans, a loading and unloading area and a secondary containment sump. used to (1) transfer hazardous waste from trucks to railcars or vice versa, (2) load and unload hazardous wastes from/to trucks and railcars, (3) rinse and decontaminate railcars, trucks and roll-off bins and (4) storage of hazardous waste in railcars no more than 24 hours. This unit is authorized to store up to 3 railcars. The maximum throughput capacity of the Railcar Loading & Unloading Unit (RLUU) is:

Unit Name	Container Type	Maximum Volume	Maximum Yearly Throughput
RLUU	Bulk Liquids	75,000 gallons	104 tank railcars/yr @ 25,000gal/car=2,600,000gal/yr
RLUU	Bulk Solids	90 Tons	75 gondolas railcar/yr @ 90 tons/car = 6,750 tons/yr

2. Container Storage Unit – Consists of an area covered by roof and is used to store containers of hazardous waste generated from railcar decontamination processes. The Container Storage Unit contains twelve pallets arranged in four rows of three pallets per row. Pallets may be arranged differently as long as 30" aisle space is unobstructed. Each pallet may contain up to 4 x 55 gallon drums and/or one 300-gallon tote. This area may contain up to 48 x 55 gallon drums or any size container (i.e. drum, tote) not to exceed 2,640-gallon total capacity.

The movement of hazardous wastes and materials in and out of the DKE facility will be by truck and rail. Truck traffic will enter and exit the facility off East 26th Street. Rail traffic will enter and exit the facility from the south off Bandini Boulevard. During routine hazardous waste transfer operations, traffic will consist of the following:

- Facility Employee Traffic - 8 cars per 24-hour period
- Hazardous Waste Material Receiving - 3 railroad cars and 10 trucks per 24-hour period
- Hazardous Waste Shipping - 10 trucks per 24-hour period
- Misc. Shipping and Receiving – 3 trucks per 24-hour period

The 24-hour periods can occur up to 7 days a week. Currently only 3 railcars for transferring hazardous waste may be on the DKE site at any one time. These 3 cars may enter and exit the site within a 24-hour period.

There is no new construction activities associated with this project. It will continue the rail transfer activities already approved within the consent order.

Facility History

Prior to 1961, the site was vacant land. From 1961 through 1980, Proler International operated a tin stripping business at the site. From 1981 through 1997, Triple J. Pacification operated a waste treatment facility, which received a Hazardous Waste Facility Permit from the Department of Health Services in March 1983. In 1986, Triple J. Pacification changed its name to Chem-Tech Systems, Inc. and in June 1987, Chem-Tech Systems was issued a RCRA permit. The maximum permitted storage capacity was 371,300 gallons and the maximum treatment capacity was 75,000 gallons per day. The hazardous waste management units permitted in the 1987 permit were:

- M-1 Treatment Unit
- M-2 Treatment Unit
- M-11 Treatment Unit
- F-501 Treatment Unit
- F-502 Treatment Unit
- Wastewater Physical Separation Unit
- Wastewater Polishing Unit
- Batch Discharge Tanks
- Solvent Wastewater Storage & Treatment Unit
- Storage and Treatment Tank Unit
- Acid Bulk Receiving & Storage Unit
- Container Receiving and Inspection Unit
- Container Storage Unit West
- Consolidation of Solid and Sludges Unit
- Bulk Solid Storage Unit
- Railcar Loading & Unloading Unit

Chem-Tech Systems treated, stored, recycled, and transferred RCRA, Non-RCRA, and non-hazardous waste received from off-site generators. The wastes were delivered to the facility via truck, tanker truck, vacuum truck, and railcar and included roll-off bins and various size drums and containers. The wastes were treated by a sequence of chemical and/or physical processes to destroy or remove hazardous constituents. The products from the treatment process were either recycled onsite or shipped off-site to an appropriate recycling, treatment, and/or disposal facility. Wastewaters produced by the various treatment processes were further treated and discharged by permit to the Los Angeles County Sanitation District. Waste that could not be treated on-site was shipped off-site to an appropriate treatment and/or disposal facility.

In October/November 1997, D/K Holdings, Inc., a subsidiary of DeMenno/Kerdoon, Inc., purchased the stock of Chem-Tech Systems, Inc., and continued to operate the facility as DKE under the existing permit until March 2006. At that time, the facility stopped receiving off-site waste for treatment but continued rail transfer activities under consent order HWCA 2004-0437 issued by the DTSC in January 2007. Closure procedures were commenced, which included treating, processing, and transferring all waste that was in inventory and removing decontaminated tanks, pipes, and process equipment from the site. DKE received formal approval of its closure plan from the DTSC in May 2008.

In March 2009, DKE completed the closure activities of the former off-site hazardous waste units that performed storage and treatment processes. In December 2009, the final closure report was submitted to the DTSC. DKE continues to operate rail transfer activities under the HWCA consent order.

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact:

NONE. The proposed project is not located near or in the immediate vicinity of any scenic resources. The area is zoned for heavy industrial and commercial land uses. Therefore, no impact to aesthetics or scenic resources would occur. For these reasons, no further analysis of impacts to this resource category is deemed necessary.

Description of Baseline Environmental Conditions:

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:

1. *D/K Environmental. 2011. Environmental Information Form*
2. *D/K Environmental. 2009. Hazardous Waste Transfer and Storage Facility Operation Plan Permit Application,Prepared for D/K Environmental*
3. *City of Vernon. 2008. Comprehensive Zoning Ordinance of The City Of Vernon. Retrieved from: http://www.cityofvernon.org/assets/docs/2008VernonZoningOrdinance.pdf*

2. Agricultural Resources

Project Activities Likely to Create an Impact:
NONE. The proposed project is not located in or near any agricultural resources. The area is zoned for heavy industrial and commercial land uses. Therefore, no impact on agricultural resources would occur. For these reasons, no further analysis of impacts to this resource category is deemed necessary.

Description of Baseline Environmental Conditions:

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:

1. *D/K Environmental. 2011. Environmental Information Form*
2. *D/K Environmental. 2009. Hazardous Waste Transfer and Storage Facility Operation Plan Permit Application, Prepared for D/K Environmental*
3. *City of Vernon. 2008. Comprehensive Zoning Ordinance of The City Of Vernon. Retrieved from: http://www.cityofvernon.org/assets/docs/2008VernonZoningOrdinance.pdf.*

3. Air Quality

Project Activities Likely to Create an Impact:

- Truck and railcar transportation of hazardous waste
- Loading and unloading of hazardous waste
- Decontamination of railcars

Description of Baseline Environmental Conditions:

The DKE facility is located within the South Coast Air Basin (SCAB), which consists of the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, as well as all of Orange County. The SCAB is generally characterized as having a mild climate with cool breezes, occasionally interrupted by periods of extremely hot weather, winter storms, or Santa Ana winds.

Annual precipitation in the SCAB varies considerably, but averages less than 15 inches per year, with 80% occurring from December through March. Average wind speed is very light, and the dilution of air contaminants is generally slow. Winds in the vicinity of the facility predominantly flow from the west to the east.

Temperature inversions also occur frequently in the SCAB and restrict vertical dispersion of air contaminants. The climate, combined with the topography of Southern California, make the SCAB an area of high air pollution potential. The SCAB exceeds the federal ozone standard more frequently than any other area of the United States. The number of days the federal ozone standard is exceeded is decreasing. In 1999, the SCAB made it through an entire year without experiencing a Stage 1 episode.

The sources of air contaminants in the SCAB vary by pollutant, but generally include on-road mobile sources (cars, truck, and buses), other mobile sources (construction equipment, trains, ships, planes, etc.), residential and commercial sources, and industrial/manufacturing sources. Mobile sources are responsible for much of the total SCAB emissions of severe pollutants (i.e., NOx, CO, and VOCs). Refer to Attachment C.

The DKE facility currently requires no air quality permits from the South Coast Air Quality Management District (SCAQMD) for its hazardous waste transfer activities. The facility is exempt from air permits for the transfer of wastes as the pumps on the trucks engaged in the transfer activities are utilized.

Analysis as to whether or not project activities would:

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

Impact Analysis:
The site is located within the jurisdiction of the SCAQMD. No air quality permits are required for DKE from the SCAQMD for the hazardous waste transfer activities. Refer to Section 3b for air quality plan.

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:
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. The SCAQMD has also developed criteria air pollutant significant impact thresholds. SCAQMD thresholds can be found in Attachment C.

Regarding potential air emission impacts at the DKE facility, as there will be no construction associated with the facility, and the transfer of wastes between trucks and railcars are exempt from air permitting for DKE, the emissions are limited to employee vehicles, hazardous waste carrying truck traffic to and from the facility, and the rail cars associated with the hazardous waste activities. The number and type of vehicles and railcars are as follows:

- Facility employee traffic - 12 cars per 24-hour period
- Hazardous Waste material receiving - 3 railroad cars per 24-hour period
- Hazardous Waste shipping -12 heavy duty diesel (HDD) trucks per 24-hour period

Air emissions from these sources were calculated using the EMFAC 2007 calculator provided by the CA Air Resources Board. The results for each of these sources can be found in Attachment D. Below is a summary table, which concludes that the emissions do not exceed the SCQQMD Thresholds of Significant Impact.

	HDD Trucks/ vehicles	Railcars	Total	SCAQMD thresholds of significant	Exceed thresholds?
CO	9.9	1.6	11.5	550	No
NOx	20.3	11.8	32.1	55	No
ROG	2	0.61	2.61	55	No
SOx	0	1	1	150	No
PM10	1.8	0.39	2.19	150	No
PM2.5	1.9	N/A	1.9	55	No

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:
The project is located within SCAQM, which is in non-attainment standard for ozone (O3) and particulate matter 2.5 (PM2.5). As stated above in 3b, the facility's emissions for PM2.5 and O3 are below the SCAQMD thresholds of significant. Therefore, the proposed project would not result in a significant increase of any criteria pollutant for which the project region is non-attainment.

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

d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:
The nearest residents are located 0.62 mile southwest of the facility. The nearest hospital is Los Angeles Community Hospital, located in East Los Angeles approximately 1.25 miles northeast. The closest school is Animo Leadership Charter High, located at 1114 South Lorena Street, Los Angeles, CA 90023, approximately 1 mile north of the facility. Buena Ventura Convalescent, located at 1016 South Record Avenue, Los Angeles, CA 90023 is approximately 1.5 miles northeast from the facility. There are no substantial pollutant emissions from the facility; therefore, the residents will not be exposed to substantial pollutant concentrations.

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:
All hazardous waste are stored in closed containers and do not create any objectionable odors to the existing environment.

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:
There is no Naturally Occurring Asbestos in or near the proposed project Site. Refer to Section 6f.

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

References Used:

1. *South Coast Air Quality Management District (SCAQMD). 2007. Air Quality Management Plan*
2. *EMFAC 2007, Emission Factors for On-Road Passenger Vehicles and Delivery Trucks*
3. *D/K Environmental. 2011. Environmental Information Form*
4. *D/K Environmental. 2009. Hazardous Waste Transfer and Storage Facility Operation Plan Permit Application, Prepared for D/K Environmental*

4. Biological Resources

Project Activities Likely to Create an Impact:
Description of Baseline Environmental Conditions:
The DKE facility is located in the City of Vernon. The area is zoned for heavy industrial and commercial land uses. There are no significant wildlife habitats in the vicinity. The nearby Los Angeles River is a concrete channel with no substantive wildlife habitats. The site itself is covered with asphalt, concrete, or buildings except for a small area in the extreme southern portion of the project site. There are no threatened, endangered, or candidate biological resources or their habitat in or near the project area. Refer to Section 10.

In regards to plant life, the DKE facility does have some limited landscaping near the front gate, outside of the fenced part of the facility. There are a few non-native bushes along the western fence line, principally on the northwest side of the facility fence. There is also a limited amount of weedy ground vegetation and several non-native oleander (Nerium oleander) bushes in the extreme southern portion of the facility, near the access gate for the railcars. There is no plant life currently in the areas where facility activities take place.

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:
On March 28, 2012 a database search, using the California Department of Fish and Game Natural Diversity Database, was performed to ascertain if any threatened or endangered animal or plant species were located at or in the vicinity of the DKE facility. The database search was conducted for the USGS quadrangle in which the DKE facility is located (Los Angeles 7 ½ minute). None were noted in the database search results.

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:

There is no riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the CA Department of Fish and Game or U.S. Fish and Wildlife Service on, or adjacent to, the DKE facility property. The nearby Los Angeles River is concrete-lined with no substantive wildlife or aquatic habitats.

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:
There are no federally protected wetlands as defined by Section 404 of the Clean Water Act on the DKE facility property or within close proximity of the project site.

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:
There are no fish or wildlife species habitats on the DKE site, or on adjacent properties. The nearest watercourse is the nearby Los Angeles River, which is concrete-lined and contains no substantive wildlife or aquatic habitats.

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:
The City of Vernon and County of Los Angeles have no policies or ordinances regarding biological resources at or near the DKE site. There are no trees of historical, ecological, or aesthetic significance at the site.

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:
There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other related plans written by the City of Vernon or County of Los Angeles, that address biological resources at the site or nearby. The California Department of Fish and Game oversees the administration of several habitat conservation programs for the state. However, due to the fact that there are no fish or wildlife species or suitable habitat located in the area, it is highly unlikely any of the project activities will conflict with the provisions of the programs.

Conclusion:

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

References Used:

1. *California Natural Diversity Database (CNDDB) Quick Viewer (htttp://maps.dfg.ca.gov/viewers/cnddb_ quickviewer/appp.asp)*
2. *DK Environmental. 2011. Environmental Information Form*

5. Cultural Resources

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:
A Sacred Lands File search was conducted by the Native American Heritage Commission (NAHC) on February 2, 2012. Results of the search did not indicate the presence of Native American cultural resources at or near the Project Site.

The DKE site area is within an area known to be associated with prehistoric and historic Native American populations generally referred to as the Gabrielino/Tongva. The Gabrielino are known as a society identified by ethnographic records and archaeological data as occupying Southern California from the Late Prehistoric period.

Regarding historical resources, the DKE site was undeveloped land until 1961. There are no properties listed as historic with one-half mile of the DKE site. The facility is located in an area zoned for business and heavy industrial activities. The entire facility property and surrounding properties have already been developed. Therefore, DTSC does not anticipate the discovery of any resources of cultural significance.

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:
A record search was conducted in 2005 at the South Central Coastal Information Center, as part of cultural and paleontological resources survey for the DKE project site and surrounding area. This search includes a review of all recorded historic and prehistoric archaeological sites within a one-half mile radius of the DKE site as well as a review of all known cultural resource reports. In addition, the file of historic maps, the California Points of Historical Interest (PHI), the listing of California Historical Landmarks (CHL), the California Register of Historic Resources Inventory (HRI) were also checked for the DKE site.

No historic isolates have been identified within a one-half mile radius of the project site.

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:
No recorded archaeological resource has been identified within a one-half mile radius of the project area. No prehistoric isolates have been identified within a one-half mile radius of the project area. Refer to 5a

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:
There are no known unique paleontological resources or unique geological features at the site or in close proximity to the site. In 2005, a paleontological overview of the site and surrounding area (which included numerous areas with the City of Los Angeles) was conducted. Consultation was also held with the Natural History Museum of Los Angeles County that concurred that the DKE site and adjacent areas are not known for yielding fossil specimens. In addition, no excavation activities are involved in this project.

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:
There are no known human remains at or near the Site. The Site has been significantly disturbed over the years with the construction of the DKE facility.

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

References Used:

1. *A Phase I Cultural Resources Investigation and Paleontological Overview for the DKE Vernon Hazardous Waste Treatment Facility In The City Of Vernon, Los Angeles Co., California, prepared by Jeanette McKenna, M.A., R.P.A, June 2005*
2. *Callifornia Register of Historic Resources Inventory*
3. *D/K Environmental. 2011. Environmental Information Form*
4. *Native American Heritage Commission*
5. *Natural History Museum of Los Angeles County*
6. *South Central Coastal Information Center*

6. Geology and Soils

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:
The DKE facility is located on the Coastal Plain of Los Angeles (within the California Peninsular Range Geomorphic Province). It is located at approximately 190 feet above mean sea level. The facility has appreciable relief and only minor sloping to control drainage flow. Most of the site is either paved with asphalt or concrete, or covered by building structures. The only bare ground is located at the extreme south end of the site, where there are no hazardous waste operations.

The geology under the Site consists of alternating layers of permeable alluvial sediments associated with past depositions from the Los Angeles River (which is directly south of the facility, approximately 0.1 mile). The alluvial sediments are estimated to be 300 to 400 feet thick.

The facility is located in a seismically active area. Although there are no known active faults under the site or in the immediate project site vicinity, there are several faults in the area that are potential sources of strong ground shaking. These are: 1) the San Andreas fault; 2) the Newport-Inglewood fault; 3) the Whittier-Elsinore fault; 4) the Malibu-Santa Monica Raymond Hills fault; 5) Torrance-Wilmington fault; 6) the San Fernando fault; 7) the Sierra Madre fault; and 8) the Palo Verdes fault. It is highly probable that the Los Angeles region will be affected by strong earthquakes, as based on historical records.

The closest active fault is the Newport-Englewood Fault at distance of 10.2 miles south of the project site. Other active and potentially active faults include the Chino Branch of the Elsinore Fault and the Whittier fault, located at distances of about 11 miles respectively from the property. In addition, the State of California has recently included the San Joaquin

Hills Thrust Fault in their fault database. This fault has subsequently been designated a Type B Fault and is located about 4 miles from the property. The fault is considered to be potentially active.
Liquefaction of soil can accompany strong earth movement caused by earthquakes. However, liquefaction generally occurs in unconsolidated granular soil sediments that are water saturated less than 30 to 40 feet below ground surface (bgs). Groundwater beneath the DKE facility has been estimated at 165 feet below ground surface. Additionally, the Site is not within a liquefaction zone as mapped by the California Department of Conservation (1999), nor is it located in area of landslide potential as mapped by the Department of Conservation.

The soils underlying the DKE facility are designated by the U.S. Department of Agriculture (USDA) as the Hanford Association, 2 to 5 percent slopes. These soils generally occur on gently sloping alluvial fans between elevations from near sea level to 3,500 feet.

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:
Facility structures are required to be built according to the applicable California Building Code to withstand seismic events, including ground shaking and liquefaction, without catastrophic failure. All units handling hazardous waste are required to have secondary containment to contain spills and precipitation runoff. These containment structures would also contain spillage as the result of a seismic event.

The site is in an area with 5% or less slope and is considered stable with regard to landslide potential. The proposed project would not be impacted by landslides, mudslides, or slope failure.

An Alquist-Priolo Earthquake Fault Zoning Map of the area shows that there are no fault lines located on the project site.

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.
The facility is completely paved with concrete. No soil erosion or loss of topsoil will result from the project activities.

Impact Analysis:
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:
No new construction is proposed for this project. Soil would not become unstable as a result of the project. The site is not within a liquefaction zone potential as mapped by the California Department of Conservation. The Site is in an

area with 5% or less slope and is considered stable with regard to landslide potential. The proposed project would not be impacted by landslides, lateral spreading, or collapse. Refer to 6a.

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:
The DKE site soils are not expansive soils. The Site soils, described as being 60-inches deep, are well drained, and have moderately rapid subsoil permeability. No new construction is proposed for this project. The facility buildings were constructed according to the applicable California Building Code, and do not create substantial risks to life or property.

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:
There is no septic tank at the facility. DKE facility domestic wastewater is disposed of in existing municipal sewer systems. Wastewater generated during decontamination of rail cars will be stored in drums and managed or disposed at appropriately permitted offsite facilities.

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:
A geologic map of the area indicated that the project site and surrounding area is unlikely to be a source of naturally occurring asbestos.

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

References Used:

1. *U.S. Department of Agriculture, Natural Resources Conservation Service, 1969, Report and General Soil Map, Los Angeles County, CA.*
2. *California Department of Conservation. 1970. Alquist-Priolo Earthquake Fault Zone Map. http://gmw.consrv.ca.gov/shmp/download/ap/pdf/LOSANGELES.PDF*
3. *California Department of Conservation, 1999, Seismic Hazard Zone Map, Los Angeles Quadrangle http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf*
4. *California Department of Conservation, 1997, Fault Rupture Hazard Zones in California, Special Publication 42 http://cluster3.lib.berkeley.edu/EART/UCONLY/CDMG/north/sp42.pdf*
5. *California Geological Survey. 2000. Geologic Map of CA. Los Angeles Sheet. Olat P. Jenkins Edition 1:250,000*
6. *D/K Environmental. 2011. Environmental Information Form*

7. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact:

- Truck and railcar transportation of hazardous waste
- Facility employee traffic

Description of Baseline Environmental Conditions:

The City of Vernon is currently preparing a climate action plan. The plan is to provide guidance to the City on how to take advantage of opportunities to reduce emissions of greenhouses gases (GHG) linked to climate change. By reducing greenhouse gas emissions, the City expects such reductions will have the additional benefit of also reducing traditional criteria pollutants.

The SCAQMD currently has an Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans. Significant impact thresholds have been established for industrial facilities, principally as stationary sources. The significant impact threshold for GHG is 10,000 metric tons per year.

The SCAQMD does not have established or interim significant impact thresholds developed for non-stationary or mobile sources. Other major California air districts, such as the Bay Area AQMD have established non-stationary sources thresholds. For the Bay Area AQMD this is currently 1,100 metric tons per year of GHG.

Analysis as to whether or not project activities would:

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

Impact Analysis:

The DKE hazardous waste transfer project will have no stationary sources of GHG emissions. All GHG emissions will be from associated mobile sources, as described in the Air Quality section and in the Project Description above. GHG emissions were calculated using the EMFAC 2007 calculator provided by the CA Air Resources Board. The emission calculations are presented in the following table:

	EMFAC2007 Emission factors for heavy duty trucks	Light duty vehicles	9 trucks @25 mi.	3 trucks @ 75 mi.	Employee vehicles	Total	Metric tons per year in CO2e
Vehicles	**(lbs./hour)**		**(lbs/day)**				
CO2	4.22045680	1.10235154	1899.2	527.6	463.0	2889.8	478.4
	CO2 content of diesel fuel (in grams)				**Total gallons per day**	**CO2 per day (in grams)**	
Railcars							
CO2	2778				25.5	70839.0	25.9
						TOTAL	**504.3**

Based on these calculations, the proposed project will result in an increase of 504.3 metric tons of GHG per year, which is under the surrogate BAQMD mobile significant impact threshold, as well the 10,000 metric tons used by the SCAQMD for stationary sources at industrial facilities. Therefore, the proposed project is not expected to generate GHG emissions that may have a significant impact on the environment. Refer to Attachment D.

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 greenhouse gases.

Impact Analysis:
Currently, the City of Vernon does not have a GHG reduction plan. Also, as stated above in 7a, the total amount of GHG created from project activities is well below the SCAQMD stationary threshold. Therefore, the conclusion is no impact. Refer to Attachment D.

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

References Used:

1. *EMFAC 2007, Emission Factors for On-Road Passenger Vehicles and Delivery Trucks*
2. *D/K Environmental. 2011. Environmental Information Form*
3. *South Coast Air Quality Management District*

8. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Hazardous waste transfer, loading and unloading
- Decontamination of trucks and railcars transporting hazardous waste
- Storage of hazardous waste in containers

Description of Baseline Environmental Conditions:
DKE transfers RCRA, Non-RCRA, and Non Hazardous waste received from off-site generators. In managing the wastes, DKE's activities involve: consolidation, repackaging, and loading and unloading of railcars, tank trucks, roll-off bins and railcar decontamination. There is no treatment or disposal of hazardous waste at the project site.

Wastes for transfer are brought to the facility in various size containers such as cubic yard boxes, super stacks, covered roll-off bins, vacuum trucks, tank trucks, and railcars. None of these wastes are bio-hazardous, extremely hazardous, reactive, explosive, or wastes that are radioactive, dioxins or pesticides. Waste transporters use certified vehicles and have waste manifesting requirements. Two hazardous waste management units are equipped with secondary containment, which will be used to contain any accidental releases from the operation and rinse water from the vehicle decontamination. The wastes received are managed in the following waste management units:

- Unit 1 – the Railcar Loading & Unloading unit is located in track 3 and is used to ship and receive waste from off-site generators. Track 3 may contain up to 3 railcars in the following combinations: for liquids only, 3 x 25,000 gallons rail tank car, for liquids and solids 1 rail gondola car (90 tons) and 2 x 25,000 gallons rail tank car
- Unit 2 – the Container Storage Unit stores containers generated from railcar decontamination processes prior to manifesting and shipping off-site to an appropriate disposal facility.

Unit 1
The Railcar Loading & Unloading Unit is used to receive waste from off-site and to ship wastes off-site by rail. Wastes managed include liquids and solids. Activities include consolidation of wastes, repackaging, and loading and unloading of railcars. Tank trucks loading from or unloading to the Railcar Loading & Unloading Unit may only be staged in the bermed truck loading and unloading area. Wastes received by rail tank cars are loaded directly to tank/vacuum trucks for transfer to an off-site facility. On occasion, railcar contents may be transferred to another railcar. Wastes generated from railcar decontamination processes are packaged and stored within the Container Storage Unit prior to manifesting and shipping off-site to an appropriate disposal facility. Liquid wastes shipped off-site by rail tank car are transferred from tank/vacuum trucks received/arriving from off-site. Solid wastes may be managed in a rail gondola car. Solid wastes shipped offsite by rail gondola car are transferred from roll-off bins, cubic yard boxes, and/or super sacks received from off-site generators. Solid wastes received in roll-off bins and other containers must be transferred into a gondola railcar within 24-hours of receipt. The Gondola railcar is kept covered except when sampling or adding or removing wastes. Ignitable/0001 wastes in the Railcar Loading & Unloading Unit are managed only in the following manners:

1. Ignitable/0001 waste may only be managed in a railcar that is located on Track 3.

2. IgnitabieID001 wastes are pumped from tank trucks to railcars or railcar to tank trucks for shipment off-site.
3. Ignitable/0001 wastes are transferred from one railcar to another railcar for shipment off-site.
4. Ignitable waste is consolidated using Standard Work Procedures (OKE SWP-0001501) located in Appendix L, Standard Work Procedures, L-2 Ignitable Waste Consolidation.
5. Wastes characterized as 0001 are managed using spark proof tools and equipment.
6. Railcars and tank trucks containing waste characterized as 0001 are grounded using a grounding cable when Loading or unloading material.
7. Smoking is only permitted outside the DKE facility and in designated smoking areas that are posted as "Designated Smoking Area."

All connections to a railcar will be closed and/or capped except during loading and unloading operations. Tank truck mounted pumps are used to transfer a tank truck into a railcar, and to transfer a railcar into a tank truck. Rail tank cars are connected by hose to a portable air diaphragm pump or diesel pump for transfer to another railcar.

Wastes received and managed by Unit 1 include the following:

1. Used Oil/Waste Oil. Examples of this category include; used motor oils, transmission fluids, engine lubricating oils, hydraulic oils, compressors oils, gear oil, metal working oils, and oil spill cleanup.
2. Used Antifreeze (Glycols). Examples of this category include used antifreeze coolant and used glycols.
3. Oily Water. Examples of this category include water mixtures that have been contaminated with Used Oil/Waste Oil or Used Antifreeze (Glycols) including; rain water, spill cleanup, bilge water, clarifier cleanout, tank cleanout, and wastewaters from general maintenance activities.
4. Aqueous Solution. Examples of this category include water mixtures that have been contaminated with heavy metals and organics generated as by-products of wastewater treatment operations. Aqueous solutions containing halogenated
   and non-halogenated solvents.
5. RCRA Fuels Blend. Examples of this category include ignitable wastes from off-site TSDF waste consolidation, high halide oil, waste oil, paint related material, wastes, petroleum refining, liquids containing oxygenated or petroleum solvents.
6. RCRA and Non-RCRA Solids and Debris. Examples of this category include contaminated soil, contaminated absorbent, contaminated concrete, contaminated debris from site clean-up, spill clean-up, site investigations, closure activities and demolition. Tank bottoms, dirt, adsorbents, personnel protective equipment, trash, petroleum refining
   debris, and solids from general facility maintenance activities.
7. PCB Waste. Examples of this category include used oil/waste oil, oily water, tank or equipment decontamination rinsate solution contaminated with TSCA and Non-TSCA levels of PCB.

Unit 2

The Container Storage Unit is used to store waste generated from railcar decontamination processes and waste transfer activities prior to manifesting and shipping off-site to an appropriate disposal facility. All containers used for shipping and storage comply with the Department of Transportation (DOT) packaging requirements under 49 CFR Parts 173, 178, and 179. All containers are inspected prior to placing waste into it. Incompatible wastes are not placed in the same container. Once filled, the containers are closed and labeled appropriately. Containers are arranged in parallel rows with aisles at a minimum of thirty inches wide to allow for inspection and emergency equipment access. The Container Storage Unit contains twelve pallets arranged in four rows of three pallets per row. Pallets may be arranged differently as long as 30" aisle space is unobstructed. Each pallet may contain up to 4 x 55 gallon drums and/or one 300-gallon tote. This area may contain up to 48 x 55 gallon drums or any size container (i.e. drum, tote) not to exceed 2,640-gallon total capacity. Containers are moved in and out of the containment using forklift trucks. Containers moved using forklift trucks are on pallets, except for containers that are designed to be picked up directly by forklift trucks, or when forklift truck attachments designed to hold the container are used.

The Container Storage Unit manages waste in liquid, sludge, and/or solid form. The unit manages the same categories of waste as the Railcar Loading and Unloading Unit listed above, except for waste listed under #5 (RCRA Fuels Blend). Examples of this category include ignitable wastes from off-site TSDF waste consolidation, high halide oil, waste oil, paint related material, wastes, petroleum refining, liquids containing oxygenated or petroleum solvents.

General Control of Hazardous Waste On-Site

The hazardous waste facility permit that DKE is proposing to renew specifies conditions to minimize impacts associated with the handling of this waste. The conditions include such topics as: containment, facility construction, fire prevention methods, safe handling practices, required OSHA safety training for workers, routine inspections, and record-keeping. Site security and fencing are also required to prevent exposure to wastes. Potentially incompatible wastes are required to

be segregated within the area. Transportation of the waste in and out of the facility must follow manifesting requirements and use certified vehicles.

The facility is also required to follow its Health and Safety Plan (H&SP). The H&SP is the vehicle through which the safety program is implemented. This program is a living document that will be revised from time to time to reflect improved practices, regulatory changes, and recommendations by regulatory agencies. When any changes are to be made to the HS&P, the intended changes will be provided to DTSC and any other regulatory agencies, as required, for review.

Emergengcy Response

The facility is required to submit a Contingency Plan showing how the facility will respond to an emergency, including equipment available for emergency response, evacuation plan, and emergency arrangements with local fire, police, and other emergency responder agencies. The DKE contingency plan describes the actions that the DKE facility will take in the event of an emergency or accident involving hazardous wastes. This plan provides a structured list of procedures that allow DKE to respond immediately and appropriately to incidents such as fires, explosions and unplanned releases, or spills, of hazardous wastes or hazardous waste constituents to the air, soil or surface water. This process minimizes the hazards to human health and the environment that may occur as a result of emergencies involving hazardous wastes. The regulations that specify the contingency plan requirements and the plan contents are found in the California Code of Regulations (CCR), Title 22, Chapter 14, Article 4, beginning with. 66264.50. DKE keeps one copy of the plan on site, and any revisions made to the plan, and submits, when required, a copy of the plan and its revisions to each of the agencies that may provide emergency response, including DTSC, local police departments, fire departments, environmental health department, hospitals, and local and State emergency response teams. There will be continuous coordination and collaboration with state and local emergency response teams.

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:

Hazardous wastes are stored in closed containers within designated areas. The proposed project does not include the treatment or disposal of hazardous waste. No significant release is anticipated from the handling of hazardous waste. Hazardous wastes are shipped off-site for further treatment or disposal at authorized facilities. Transportation uses well-established routes through industrial, manufacturing, or commercial areas and the hazardous waste are packaged according to requirements specified in California Code of Regulations, Chapter 13 during the transportation. All DKE employees are required to follow a Health and Safety Plan (HS&P) as described in the above baseline environmental conditions. The HS&P contains safety procedures for the handling of hazardous waste. The proposed project would not create a significant hazard to the public or the environment during routine transport, or storage 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:

Hazardous waste management activities are conducted within designated areas, which are equipped with secondary containment. In case a release occurs, hazardous waste is collected and stored in closed containers. Daily inspections at the hazardous waste management units are conducted to prevent significant releases to the environment. Also, as stated above in the environmental baseline description, the facility is required to submit and follow a Contingency Plan showing how the facility will respond to an emergency, including equipment available for emergency response, evacuation plan, and emergency arrangements with local fire, police, and other emergency responder agencies. The plan describes the specific actions that will be taken if there is a spill or leak at either one of the proposed hazardous waste management units.

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:
There is no school within one-quarter mile of the facility. The nearest school (SEA Charter School) is located approximately 0.77 mile from the DKE facility. There are no other sensitive receptors within one-quarter mile.

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:
The proposed project has a Contingency/Emergency Preparedness Plan, which provides details regarding assistance and coordination with the City of Vernon Fire Department and the City of Vernon Department of Health and Environmental Control in the case of an emergency. The proposed project is not anticipated to impair implementation of any emergency response plan or emergency evacuation plan. Refer to Section 8 Description of Baseline Environmental Conditions.

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

References Used:

1. *Health Risk Assessment For The D/K Environmental Facility Vernon, California. Final Volume I&II: Potential Health Impacts Associated With Routine Operations, December 2005, RATECH Resources, LLC, Irvine, California, and Clayton Group Services, Pleasanton, California in association with: TSS Consultants.*
2. *D/K Environmental. 2009. Hazardous Waste Transfer and Storage Facility Operation Plan Permit Application, Section VIII Contingency Plan/Emergency Preparedness, Prepared for D/K Environmental*
3. *D/K Environmental. 2011. Environmental Information Form*
4. *California Dept. of Toxic Substances & Control. 2007. DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List) http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm*

9. Hydrology and Water Quality

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:
Surface Water

The nearest source of surface water in the project vicinity is the Los Angeles River, which is located approximately 0.1 mile south of the DKE facility. It is concrete lined and serves as the principal storm water conveyance system in the project vicinity. The other surface water that may occur in the project area is sheet flow caused during times of rainfall. Most of the rainfall occurs during the winter months, but there are also occasional rainfall events in the non-winter months. This storm water can also be conveyed to the Los Angeles River via the large subsurface storm water drain that is located directly under the DKE facility.

Surface water on the project site is generally sheet flow. There is a water containment basin located at the south end of the site. Sheet flow within the DKE facility is directed to this containment basin. There are no sheet flows off the site. The DKE facility also has a Storm Water Pollution Prevention Plan as part of its Industrial Storm Water Permit with the Los Angeles Regional Water Quality Control Board (Facility I.D. 419S009970) to discharge storm water associated with industrial activity. The facility drainage and containment systems are designed to handle the 25-year, 24- hour rainstorm. The facility design slopes towards the South end of the property into a 200,000 storm water catch basin. The facility is bermed along the West and East sides of the property. Swells located along on the West and East property line divert storm water into the storm water basin located at the South end of the property. Hazardous waste, if released, is also contained within its own containment and no discharge to the surface is expected.

The DKE facility is not located in the 100-year flood plain.

Groundwater

The DKE facility is located on the Los Angeles Coastal Plain, which consists principally of unconsolidated sediments and alluvium underlain by bedrock and bounded to the north and east by bedrock. The coastal plain has been divided into four groundwater basins. The DKE facility is located in the Central Basin. The Central Basin is further divided into three parts, one of which is the Central Basin Pressure Area. DKE is within this “pressure area”. It is known as the pressure area because the aquifers within it are confined or semi-confined by low permeable layers of clay and silt over most of the area. These layers form the various aquitards and aquicludes that underlay the project vicinity. The area around the DKE facility is reported to be underlain by the Bellflower aquiclude.

With these aquiclude, depth to groundwater in the project area is relatively deep. Depth to groundwater in the project area has been reported to be in the range of 200 to 250 feet below ground surface. A subsurface investigation previously conducted in 1982 at the DKE facility revealed depth to groundwater immediately under the facility to be approximately 165 feet below ground surface. This investigation also noted that perched groundwater may also exist in the region.

Water is supplied to the facility from off-site municipal wells owned by the City of Vernon. The facility does not have groundwater wells of its own onsite to supply the facility with consumptive water. There are no drinking water wells within the DKE property or within one mile of the facility. The City of Vernon has nine water wells located throughout the city, six of which are within 1.5 miles from the facility.

DKE completed a revised Human Health Risk Assessment (HHRA) in April of 2011. The HHRA was prepared to assess the current and future human health risks (i.e., non-cancer adverse health effects and excess cancer risks) related to site constituents associated with the former onsite treatment facility. As stated above, depth to groundwater beneath the DKE facility is approximately 160 feet-below ground surface (feet-bgs), and the owner and operator of the DKE facility are not aware of any groundwater contamination. Due to the shallow depth and relatively low detected concentrations of residual contaminants in soil and the presence of a confining clay layer at 18 feet-bgs, any site related contaminants in soil are not expected to impact groundwater. These findings led to groundwater being excluded as a media of concern in the HHRA.

There is no groundwater quality monitoring system currently active at the site. Groundwater has been investigated and was found not to be contaminated.

Analysis as to whether or not project activities would:

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

Impact Analysis:
Hazardous wastewater generated as a result of the facility’s hazardous waste management operations is collected and contained within containers and transported off-site. There is no violation of water quality standards or waste discharge requirements. Refer to Section 9 Description of Baseline Environmental Conditions.

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 proposed project permits DK to continue with its previously approved railcar activities under the consent order. No construction is proposed, which would involve extraction of groundwater. Therefore, the proposed 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:
No streams or rivers exist within the project area. Surface drainage water flows into the storm water containment basin (located in the southwestern end of the facility site). In addition, storm water sheet flow could flow into the railcar secondary containment sump. Any storm water that flows into the railcar secondary containment sump would be tested and disposed of properly. There is no proposal to alter the existing flow pattern at the site.

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:
DK Environmental is not located within the 100-year flood plain. Annual precipitation varies considerably, but averages less than 15 inches per year, most of which occurs between November and April; 80 percent of the precipitation occurs between December and March. There are no activities under the proposed project that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

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:
The wastewater generated from the decontamination of the hazardous waste management units are contained within the secondary containment and then pumped to containers for off-site disposal. No increase of water to the planned storm water drainage system is anticipated.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact

☒ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis:
Hazardous wastewater generated as a result of the facility's operation is contained and stored in containers and transported to an off-site permitted facility for disposal. No discharge to the surface water or groundwater is expected.

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:
This facility is not located in the 100-year flood plain. No new activities or construction are proposed that would place structures within a 100-year flood hazard area.

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:
This facility is not located in a flood plain. No new activities or construction are proposed that would expose people or structures to a significant risk of loss, injury or death involving flooding.

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

i. Inundation by sieche, tsunami or mudflow.

Impact Analysis:
The DKE facility is located approximately 15 miles east of the Pacific Ocean. Therefore, there is no potential for it to be impacted by a tsunami generated by an earthquake off the coast. There are no lakes or reservoirs near the site that could cause a sieche. Mudflows are not possible given the flat terrain of the area and the extensive paving of the surface at the DKE site and surrounding area.

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

References Used:

1. *D/K Environmental. 2011. Revised Human Health Risk Assessment.*
2. *D/K Environmental. 2011. Environmental Information Form*
3. *D/K Environmental. 2009. Hazardous Waste Transfer and Storage Facility Operation Plan Permit Application, Section VIII Contingency Plan/Emergency Preparedness*
4. *California Dept. of Toxic Substances & Control. 2011. Partial Closure Certification Acknowledgement for D/K Environmental Corporation.*

10. Land Use and Planning

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:
The City of Vernon is unusual among cities in California and the United States in that it is exclusively industrial in nature, as it was planned to be so when it was incorporated in 1905. Mixed use, such as industrial, commercial, residential, recreation, etc. common to most cities, does not occur in Vernon. Currently, there are approximately 1,200 businesses (mostly industrial), employing 44,000 people within the 5.2 square miles of Vernon. The DKE Facility is located on approximately 2.4 acres, and is surrounded by industrial and transportation-related uses. The area is zoned for heavy industrial and commercial land uses.

Directly to the east and immediately adjacent to the facility is U.S. Aluminum, which manufactures aluminum window and door frames. To the north and across East 26th Street is the Burlington Northern Santa Fe Railway Intermodal Facility. Directly to the west is a small Union Pacific equipment yard and along the southerly boundary of the DKE facility are railroad tracks. Across these tracks and west of Downey Road is a coatings facility. Across Downey Road to the west is a United Parcel Service distribution facility. Across Bandini Boulevard is currently vacant land with the concrete channel of the Los Angeles River just beyond. To the southwest, across the intersection of Bandini Boulevard and Downey Road (and the Los Angeles River Channel), is Farmer John's, a major meat processing facility. The concrete channel of the Los Angeles River is approximately 0.1 miles to the south.

There are no sensitive land uses near or adjacent to the facility, such as schools, health facilities, or residences. The closet sensitive land uses are two single-family homes on Vernon Avenue near Downey Road, nearly a half-mile south-southwest of the DKE Facility.

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:
   Per the Vernon Comprehensive Zoning Ordinance, specifically Sections 26.3.5-3(b) and 26.5.2-11, the DKE Facility was issued a Conditional Use Permit (CUP) (as Chem-Tech Systems, Inc.) on November 20, 1990 (City of Vernon Resolution No. 5837) to operate as a hazardous waste facility. This CUP was reconfirmed in a letter from the City of Vernon to DTSC dated September 16, 1996. The City letter claims that if the facility does not exceed the design storage and treatment capacity, as established by DTSC, a modification of the CUP is not needed. The permit will not increase the design storage and treatment capacity specified in the 1987 Permit.

   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:
   Refer to Section F under Biological Resources.

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

References Used:

1. *City of Vernon. 1990. Letter Approving CUP to Chem. Tech Systems Inc.*
2. *City of Vernon. 1996. Letter to DTSC Regarding CUP*
3. *City of Vernon. 2009. General Plan http://www.cityofvernon.org/assets/docs/General_plan.pdf*
4. *D/K Environmental. 2011. Environmental Information Form*

11. Mineral Resources

Project Activities Likely to Create an Impact:
NONE. The proposed project is not located in or near any known mineral resources. Therefore, no impact on mineral resources would occur. For these reasons, no further analysis of impacts to this resource category is deemed necessary.

Description of Baseline Environmental Conditions:

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:
1. *City of Vernon, 2009 General Plan http://www.cityofvernon.org/assets/docs/General_plan.pdf*
2. *D/K Environmental. 2011 Environmental Information Form*

12. Noise

Project Activities Likely to Create an Impact:
- Truck and railcar transportation of hazardous waste.
- Loading and unloading of hazardous waste

Description of Baseline Environmental Conditions:
The City of Vernon is unique in that its status as an all-industrial community establishes different sensitivities regarding noise than those present in typical suburban or even mixed-use urban areas. Local businesses are not significantly impacted by higher noise levels that would not be appropriate in a residential neighborhood or near schools, parks, or hospitals.

In 2007, the City conducted a comprehensive noise survey of the community to document the noise environment. Measurements were taken at eleven locations, including two border locations in adjacent communities. Three measurements consisted of 24-hour recordings of the sound environment, and the balance were limited duration measurements at representative locations throughout Vernon and, as noted above, on the border of neighboring communities. The most significant noise-producing activity within Vernon involves the transportation systems: the arterial roadways and train movements along regional rail lines. In addition, many major manufacturing businesses create high noise levels.

Sound levels which exceed 85 dB(A), when experienced for long durations during each working day, may result in severe temporary or even permanent hearing loss. State and federal safety and health regulations currently protect workers at levels of exposure that exceed 90 dB(A) for each eight-hour workday. Speech intelligibility is impaired when sound levels

exceed 60 dB(A). The level of interference increases with sound level and the distance between speaker and listener. Sound levels that exceed 40 to 45 dB(A) are generally considered to be excessive for sleeping areas within a residence.

In their General Plan, the City of Vernon adopts the community noise equivalent level (CNEL) to measure noise exposure. This measure weights the average noise levels for the evening hours (7:00 P.M. to 10:00 P.M.), increasing them by 5 dB, and weights the late evening and morning hour noise levels (10:00 P.M. to 7:00 A.M.) by 10 dB. The daytime noise levels are combined with these weighted levels and are averaged to obtain a CNEL value. The CNEL generated in Vernon associated with truck and automobile traffic along Vernon's arterial roadways are 70 CNEL along the roadway frontages. The CNEL generated by traffic on the I-710 freeway is as high as 80 dB. However, the land uses affected by the traffic noise are largely industrial in nature and are not noise sensitive. The CNEL associated with train movements in and through Vernon is as high as 80 dB. However again, the land uses affected by the noise are largely industrial in nature and are not noise sensitive.

Land uses surrounding the facility include other large industrial uses, such as high-volume roadways with substantial large diesel-powered truck traffic, a multi-track railroad right-of-way across E. 26th Street, along with the accompanying Burlington Northern Santa Fe Railway Los Angeles Intermodal Facility to the northeast. Frequent air traffic, such as helicopters, is also a contributor to the local noise environment in the DKE Facility area.

Noise-sensitive receptors adjacent to the DKE facility such as residential uses, schools, and health-related facilities, are non-existent. The closest of such noise sensitive land uses are two single-family dwellings located nearly ½-mile south-southwest of the DKE Facility.

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:
The two principal sources of noise that would be associated with the hazardous waste transfer activities at the DKE facility site would be noise associated with truck traffic and railcar movement. The 2007 City of Vernon Noise Element describes noise from such sources as two of the principal sources of noise in Vernon.

As new and different sources of noise will not be added to the DKE project site, it is not expected that the noise levels emanating from the DKE facility will change as a result of the hazardous waste transfer activities.

Section 26.4.1 – 6 (b) (2) of the City of Vernon General Industry Zone designation allows up to 75 dBa of noise from the DKE facility at any time of the day. The noise levels are not expected to exceed City standards and are within safety levels for DKE employees.

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:
Other than the movement of trucks and railcars at the DKE facility, no industrial or manufacturing activities for hazardous waste will occur, thus there will be no excessive groundbourne vibration or noise levels.

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:
The noise impact associated with this project is limited to the traffic and railcar movement. As part of a previous environmental study at the DKE site, a noise survey program was conducted in July 2005, at locations around the

DKE facility. Noise level measurements were conducted at a 30-minute period at each location. An Extech Model 407732 digital sound level meter was used for the noise-monitoring program. The meter meets ANSI s1.4-1983 requirements for Type 2 sound level meters. The meter was calibrated before and after the survey period using an Extech Model 407744 Sound Level Calibrator. The microphone was fitted with a windscreen to reduce wind-generated noise and was handheld approximately five feet about the ground.

Noise at the DKE Facility monitoring locations was dominated by vehicular traffic noise from Bandini Boulevard (south side), Downey Road (west side), and East 26th Street (north side). Noise surveying locations on the northerly side of the DKE Facility also had frequent railroad traffic along the Burlington Northern Santa Fe railroad right-of-way. Noise from the DKE Facility operations was not apparently distinguishable from the heavy vehicular traffic around the facility. Also, the facility itself generated very little of this vehicular traffic.

As shown in the table below, Facility property line noise levels were highest at the south end of the DKE Facility. However, this location was also dominated by the vehicular traffic on Bandini Boulevard, and the starting and stopping of large diesel-powered trucks at the stop lighted intersection of Bandini Boulevard and Downey Road. The lowest noise level was surveyed at the automotive-related commercial operations located approximately 350 yards northwest of the DKE Facility. This survey location was approximately 1 block from one of the main arterial roads (Downey Road), but again vehicular traffic was the predominant noise source, along with the train engines on the nearby Burlington Northern Santa Fe rail lines. Due to the sporadic nature of the vehicular traffic (controlled in part by traffic lights in the nearby intersections, noise levels were variable at the noise survey locations. Noises associated with elevated levels at the survey locations were diesel-powered truck and trains going by. During the survey times, there was also considerable helicopter traffic, with at least one helicopter over flight heard at each survey location during the specific survey time.

Existing Ambient Noise Levels (dBA) in Vicinity of DKE Facility

Location	Land Use Category	L90 (dBA)	L10 (dBA)	Leq (dBA)	CNEL (dBA)
- 1 - South side of DKE facility between railcar entrance to facility and Bandini Boulevard	Industrial	66	72	69	72.5
- 2 - North of facility near intersection of S. Downey Road and E. Washington Blvd. (approximately 350 yards northwest of site)	Industrial	62	68	66	69.6
- 3 - Outside entrance gate to DKE facility in the outdoor employee break area	Industrial	64	70	70	74
- 4 - East end of DKE facility parking lot on East 26th Street	Industrial	65	72	70	74
-5 - West side of facility on Downey Road sidewalk (approximately 100 feet from facility fence)	Industrial	63	70	68	71.6

The CNEL measured for the DKE area are in conformance with the CNEL measurements made during the City of Vernon's noise survey in 2007 (as part of its update to the City Noise Element) and do not exceed 75dBA.

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:

No new activities or construction are proposed, which would cause a substantial temporary or periodic increase in ambient noise levels in the vicinity above levels existing without the project.

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

References Used:

1. *D/K Environmental. 2011. Environmental Information Form*
2. *City of Vernon, 2009. General Plan. http://www.cityofvernon.org/assets/docs/General_plan.pdf*
3. *City of Vernon. 2008. Comprehensive Zoning Ordinance of The City Of Vernon. Retrieved from: http://www.cityofvernon.org/assets/docs/2008VernonZoningOrdinance.pdf*
4. *TSS Consultants. 2005. Traffic Study Report For the Vernon DKE Hazardous Waste Facility.*

13. Population and Housing

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:
The City of Vernon's fully industrial nature creates unavoidable conflicts with housing due to safety and environmental concerns. The Southern California Council of Governments (SCAG) historically assigned Vernon very low housing production goals – and in the case of this cycle, a Regional Housing Needs Allocation of zero - in recognition of Vernon's unique status as city devoted exclusively to industrial uses. The City of Vernon is committed to maintaining the existing, long-established housing stock of 31 units. However, City policy precludes the development of any new residential units.

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:
Previously the DKE project site had approximately 40 employees when it was operating as a hazardous waste treatment facility up until the mid-2000's. Currently, there are approximate 6 employees at the DKE facility. The proposed project will utilize 6 to 12 employees. The proposed project would not induce substantial population growth either directly or indirectly nor would it substantially increase the number of workers in the area on a daily basis.

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:
The proposed project will not result in any displacement of existing housing nor cause the need to construct replacement housing.

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:
The proposed project will not result in any displacement of people, or the construction of replacement housing.

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

References Used:

1. *City of Vernon, 2009, General Plan http://www.cityofvernon.org/assets/docs/General_plan.pdf*
2. *D/K Environmental. 2011. Environmental Information Form*

14. Public Services

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:
Fire protection - The DKE facility is provided fire protection by the City of Vernon Fire Department (VFD). The VFD has mutual aid agreements with five other neighboring cities. There are two VFD fire stations within two miles of the DKE facility. The VFD has over 70 fire personnel, with approximately half of them trained as Hazardous Material Specialists to respond as Level A Hazardous Material Unit personnel to hazardous materials release incidents.

Police protection - The City of Vernon Police Department, located approximately 2 miles west of the DKE facility, has the primary responsibility for police services for the facility.

In addition to Vernon police protection, the DKE site has substantial access control measures, such as: locked gates when the facility is unattended and a 24-hour surveillance system, which continuously monitors and records the entry onto the facility as well as activity within the DKE facility. During the hours of 6:00 a.m. to 5:00 p.m. Monday thru Friday, DKE personnel monitor the site. During the hours of 5:00 p.m. through 6:00 a.m., and 24 hours each day on Saturday, Sunday, and holidays, DeMenno/Kerdoon (D/K) personnel located at 2000 North Alameda Street, Compton, CA 90222, monitor the DKE site. The camera feed is automatically sent to D/K's surveillance monitoring center where D/K operators can view the DKE facility.

Schools – The closet school is located 0.77 miles to the north of the DKE facility. There are no schools within the Vernon city limits

Parks – The closet park is located approximately 1 mile to the north of the DKE facility (Ramon Garcia Park).

Other public facilities – The nearest public facility to the DKE facility is the Lou Costello Jr. Recreation Center, approximately 0.8 miles to the north.

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:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

Impact Analysis:
There are no proposed changes in this project that will require any alteration to the existing public services. The project does not include an increase in facility size or operating capacity. The proposed project will not require

additional fire or police protection services or facilities beyond those currently existing. The project will not impact existing fire or police ratios, response times or other performance objectives. 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. Refer to Section 14 Description of Baseline Environmental Conditions.

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

References Used:
1. *D/K Environmental. 2011. Environmental Information Form*

15. Recreation

Project Activities Likely to Create an Impact:
NONE. There are no parks and related recreational facilities located within the city limits. The City of Vernon is an industrial-based city with very few residents. Therefore, no impact on recreational resources would occur. For these reasons, no further analysis of impacts to this resource category is deemed necessary. Refer to Section s 10 and 14.

Description of Baseline Environmental Conditions:

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:

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:

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

References Used:
1. *D/K Environmental. 2011. Environmental Information Form*
2. *City of Vernon, 2009 General Plan, http://www.cityofvernon.org/assets/docs/General_plan.pdf*

16. Transportation and Traffic

Project Activities Likely to Create an Impact:
- Truck and railcar transportation of hazardous waste

Description of Baseline Environmental Conditions:

The DKE Facility is located at 3650 East 26th Street, near the southeast corner of the South Downey Road/East 26th Street intersection in Vernon, California. The project site lies approximately one mile south of the I-5 Santa Ana Freeway, and approximately two miles west of the I-710 Long Beach Freeway.

A rail line of the Union Pacific and Burlington Northern Santa Fe Railways traverses the local area in an east-west direction. In the vicinity of the project site, this railway corridor runs immediately along the northern side of 26th Street. A freight siding serves the project site, which is connected to the Union Pacific Railroad with authorization to the Los Angeles Junction Railway, which is owned by the Burlington Northern Santa Fe Railroad crossing on Bandini Boulevard.

Primary access roads in the vicinity of DK Environmental are the major east-west arteries Washington Boulevard and Bandini Boulevard and the north-south Soto Street. All of these major streets are designed truck routes. Interstates 710 and 5 provide freeway access to the facility. Truck Traffic enters and exits the facility off 26th Street. Rail traffic enters and exits the facility off Bandini Boulevard. Attachment E contains an external traffic map that illustrates the traffic routes for vehicles transporting hazardous wastes to or from the DKE facility.

The City of Vernon is a built-out urban area, primarily developed for industrial uses. The primary roadways within Vernon are major arterials that serve regional auto trips and truck trips. Downey Road is a north-south arterial within Vernon that provides access to the project site via the South Downey Road connector and 26th Street. Direct access to the project site is provided via a northern site driveway, which fronts on 26th Street.

Local access to the project site is provided by South Downey Road, which serves as a frontage road on the east side of Downey Road, providing access to uses in the immediate area. There is no direct access to the project site from Downey Road. Local access to the project site is also provided by 26th Street, which is located to the north of the project site.

Downey Road provides connections to major east-west arterials such as Olympic Blvd. (to the north) and Bandini Blvd. (to the south). This network of arterials provides access to regional freeways. DKE will coordinate with the California Department of Transportation to ensure levels of service on state highways continue to be safe and congestion manageable.

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:

The movement of hazardous wastes and materials in and out of the DKE facility will be by truck and rail. Truck traffic will enter and exit the facility off East 26th Street. Rail traffic will enter and exit the facility from the south off Bandini Boulevard. During routine hazardous waste transfer operations, traffic will consist of the following:

- Facility Employee Traffic - 8 cars per 24-hour period
- Hazardous Waste Material Receiving - 3 railroad cars and 10 trucks per 24-hour period
- Hazardous Waste Shipping - 10 trucks per 24-hour period
- Misc. Shipping and Receiving – 3 trucks per 24-hour period

The 24-hour periods can occur up to 7 days a week. Currently only 3 railcars for transferring hazardous waste may be on the DKE site at any one time. These 3 cars may enter and exit the site within a 24-hour period.

In 2005, a traffic study was conducted for a previous hazardous waste treatment expansion and reconfiguration project at the DKE facility site. In that study, there were four roadway segments that were analyzed as major collector and arterial roadways that provide access to the immediate DKE project site area. These four roadway segments were analyzed for traffic load and capacity:

1. Downey Road, north of South Downey Road
2. Downey Road, north of Bandini Blvd
3. East 26th Street, west of Downey Road undercrossing
4. East 26th Street, east of Downey Road undercrossing

Based on traffic counts conducted at the roadway segments, the following average daily traffic counts were determined:

Summary of Roadway Segment Volumes – Existing (2005) Average Daily Traffic

Roadway Segment Location	Auto Volumes		Truck Volumes (3+ Axles)		Truck Volumes x2.5 PCE *		Combined Auto Volumes + Truck PCE
	North/ East	South/ West	North/ East	South/ West	North/ East	South/ West	Both Directions
1. Downey Road, north of South Downey Road conn.	7,176	8,517	937	1,351	2,343	3,378	**21,410**
2. Downey Road, north of Bandini Blvd.	7,439	8,219	747	1,495	1,868	3,738	**21,260**
3. 26th Street, west of Downey Road undercrossing	2,452	1,683	663	717	1,658	1,793	**7,590**
4. 26th Street, east of Downey Road undercrossing	2,257	1,879	532	673	1,330	1,683	**7,150**

** A Passenger Car Equivalent (PCE) factor was utilized to escalate truck volumes to passenger car volumes. The PCE factor of 2.5 was defined by the Heavy Duty Truck Model developed by SCAG.*

Roadway Segment Location	***Existing Average Daily Traffic***	***Added Project Daily Trips ****	***Project-Related Percent Increase***
1. Downey Road, north of South Downey Road conn.	*21,414*	*+24*	*+0. 11%*
2. Downey Road, north of Bandini Blvd.	*21,264*	*+24*	*+0.11%*
3. 26th Street, west of Downey Road undercrossing	*7,586*	*+24*	*+0.3%*
4. 26th Street, east of Downey Road undercrossing	*7,149*	*+24*	*+0.3%*

** Project trip generation was defined by 12 daily truck trips – these trips are represented by 12 trips in and 12 return trips out. For daily roadway segment totals, these trips are conglomerated into the two-way totals. Project-related trips therefore total 24. To be conservative in determining potentially significant impacts, 24 additional trips were each applied to the roadway segments.*

Project related traffic will increase the amount of daily traffic by less than 1%. Therefore, the traffic created by project activities (31 vehicles and 3 railcars) is not anticipated to significantly increase the average amount of existing traffic in the project area.

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:
The City of Vernon does not have level of service (LOS) standards for roadways. The Highway Capacity Manual (HCM) software was utilized to determine roadway LOS within the study area. Inputs to the software include total unadjusted daily volumes, truck percentages, peak percentage of total volumes, and directional splits of volumes. Determining the LOS provided a basis for the determination of significant impacts, based on standards defined within the County of Los Angeles Congestion Management Program (CMP).

The following summarizes the existing LOS value at the study roadway segments. All of the study roadway segments currently operate at Level of Service C or better, based on daily volumes and existing configurations. These LOS values represent acceptable operating conditions.

Study Roadway Segment Operations - Existing Level of Service

Roadway Segment Location	Level of Service
1. Downey Road, north of South Downey Road conn.	B
2. Downey Road, north of Bandini Blvd.	A
3. 26th Street, west of Downey Road undercrossing	C
4. 26th Street, east of Downey Road undercrossing	C

The County of Los Angeles CMP standard for significant impacts on a roadway facility is based on a 2% minimum increase in traffic capacity, at Level of Service E or F. As all of the study roadway segments would operate at LOS C or better with or without project traffic, and project-related volume increases do not significantly change capacity on any of the segments, there would be no significant Project traffic impacts under the new facility permit.

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 streets in the area have been developed for industrial uses and are wide and relatively straight. No new activities or construction are proposed, which would increase hazards due to a transportation design feature.

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

d. Result in inadequate emergency access.

Impact Analysis:
The proposed project will not alter the outside traffic approach to or from the facility, or alter the traffic pattern within the facility. No new activities or construction are proposed which would result in inadequate emergency access.

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

e. Result in inadequate parking capacity.

Impact Analysis:
There are currently over 64 off-street parking spaces at the DKE facility, plus off-street room for waiting trucks to load and unload. The project does not include an increase in facility size or operating capacity. Therefore, the project will not result in inadequate parking capacity.

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 City of Vernon has not adopted any policies for alternative transportation. 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:

1. *2010 Congestion Management Plan, County of Los Angeles, CA, http://www.metro.net/projects/congestion_mgmt_pgm/*
2. *Traffic Study Report for the Vernon DKE Hazardous Waste Facility, July 2005, prepared by Katz, Okitsu & Associates, Monterey Park, CA*
3. *Los Angeles Metro, Joint Development Program, http://www.metro.net/projects/joint_dev_pgm/*
4. *D/K Environmental. 2011. Environmental Information Form*

17. Utilities and Service Systems

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:
Water service for the DKE site is from the City of Vernon Community Services Department Water Division. The majority of the City's water is also supplied from this source. In 2011, the facility used a total of 225 cubic yards of water for all of its operations. The City does not put any restrictions on the facility as far the amount of water allowed for project activities. In addition, Vernon has a direct interconnection to the Metropolitan Water District (MWD). The MWD connection provides both a supplemental water source and an emergency supply in the event of a major power outage.

The City owns its own sewerage collection system, which discharges into the system managed by the Los Angeles County Sanitation Districts (LACSD).

The City of Vernon operates its own Light and Power Department, supplying customers throughout the City with reliable and comparatively low-cost electrical power. The City generates electrical power and also purchases power from third-party suppliers through its connection with the Southern California Edison bulk power system and the Cal-ISO grid at the Laguna Bell Substation. In 2011, the facility used 3,937 kilo watt hours (kwh) of electricity. The majority of the total electricity is not used for the transfer and storage of hazardous waste. The facility also transfers a variety of other products that do not require a permit from DTSC.

Analysis as to whether or not project activities would:

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

Impact Analysis:
No wastewater treatment occurs on the project site. Therefore, no approval from the Los Angeles Regional Water Quality Control Board is required.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact

☒ No Impact

b. Describe those aspects of the project that would require or result in the construction of new water or wastewater facilities or expansion of existing facilities.

Impact Analysis:
No new water or wastewater facilities are needed for this project.

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

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

Impact Analysis:
Water service for the DKE site is from the City of Vernon Community Services Department Water Division. The DKE project will use up to approximately 24,000 gallons of water per year for rinsing out rail cars (all rinseate will be containerized and shipped for appropriate offsite management). This project involves a hazardous waste facility permit. There are sufficient water supplies available to serve the project from existing entitlements and resources. No change in the volume of water needed is anticipated.

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

d. 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:
The City owns its own sewerage collection system, which discharges into the system managed by the Los Angeles County Sanitation Districts (LACSD). This project is a renewal of an existing permit and no increase in wastewater is anticipated. Therefore, the wastewater treatment provider, which serves the project, would not be required to determine whether it has adequate capacity to serve the project demand.

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

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

Impact Analysis:
DKE hazardous waste transfer activities will generate solids such as oily debris (plastic, PPE, poly buckets, brooms shovels, expired hoses, etc) oily absorbent from floor sweeps and or drips/leaks. Solids may go to US Ecology, East Carbon Development Corp, or Chemical Waste Management or other approved Class I or II landfills depending on its waste characteristics. Prior to the shipment to these disposal facilities, an approval is needed in order to establish that sufficient permitted capacity is available. Usually, once DKE receives a request to utilize its transfer operation, DKE gets approval from the off-site disposal facility that sufficient capacity is available before receiving the hazardous waste. If none of the above facilities are able to accept the hazardous waste, an alternate facility that is permitted to accept the hazardous waste is chosen.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated

☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:
This project involves the renewal of a hazardous waste facility permit that will allow the facility to continue operating in compliance with federal and state statutes and regulations concerning hazardous waste. The proposed project would facilitate the handling of hazardous solid waste in the region. 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 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:

1. *City of Vernon, General Plan, December 2007, amended February 2009*
2. *D/K Environmental. 2011. Environmental Information Form*

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.

//Original signed by//		7/9/2012
Preparer's Signature		Date
Sam Coe	Hazardous Substances Scientist	(9160 255-3587
Preparer's Name	Preparer's Title	Phone #
//Original signed by//		7/9/2012
Branch or Unit Chief Signature		Date
Mohinder Sandhu	Supervising Hazardous Substances Engineer II	(916) 255-3716
Branch or Unit Chief Name	Branch or Unit Chief Title	Phone #

ATTACHEMENT A

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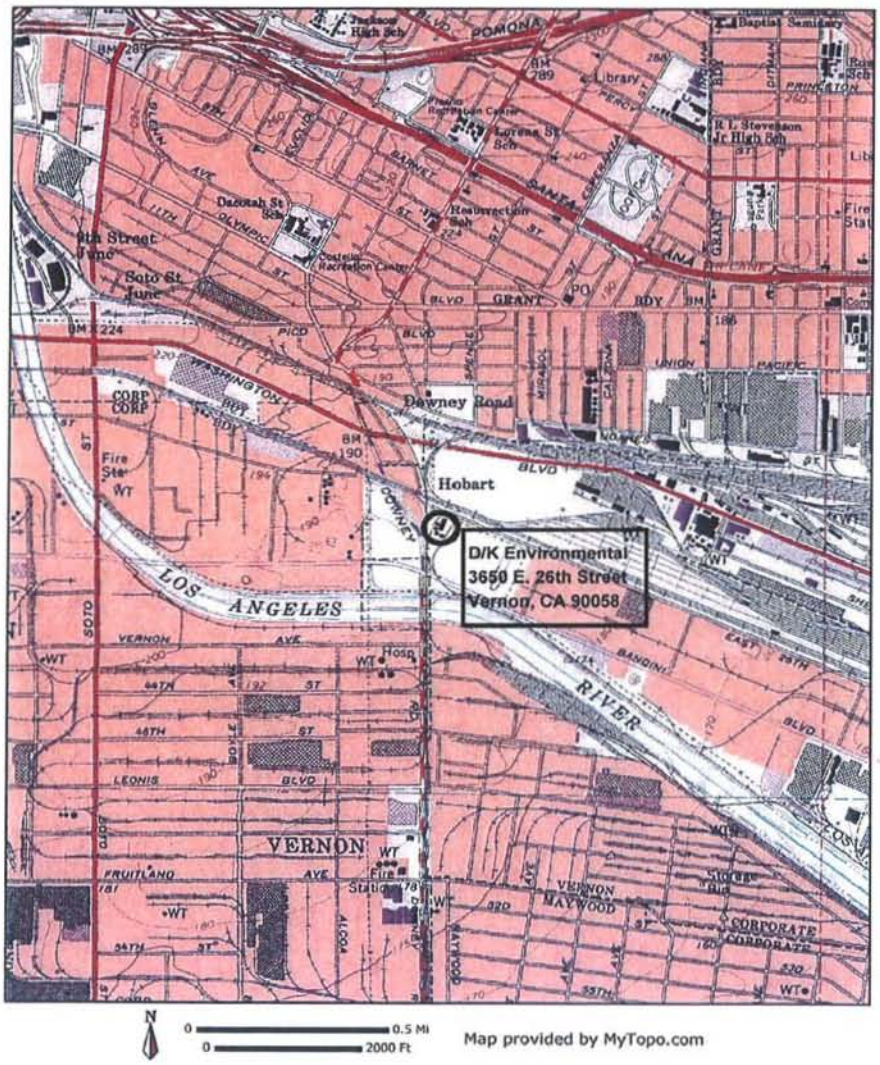
ATTACHMENT B

MyTopo Map Print Page 1 of 1



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LOCATION MAP

ATTACHMENT C

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), Odor, and GHG 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) Chronic & Acute Hazard Index ≥ 1.0 (project increment)
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402
GHG	10,000 MT/yr CO2eq for industrial facilities

Ambient Air Quality Standards for Criteria Pollutants [d]	
NO2 1-hour average annual arithmetic mean	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) and 0.0534 ppm (federal)
PM10 24-hour average annual average	10.4 $\mu g/m^3$ (construction)[e] & 2.5 $\mu g/m^3$ (operation) 1.0 $\mu g/m^3$
PM2.5 24-hour average	10.4 $\mu g/m^3$ (construction)[e] & 2.5 $\mu g/m^3$ (operation)
SO2 1-hour average 24-hour average annual arithmetic mean	0.25 ppm (state) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (state) & 0.14 ppm (federal) 0.03 ppm (federal)
Sulfate 24-hour average	25 $\mu g/m^3$ (state)
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) and 35 ppm (federal) 9.0 ppm (state/federal)
Lead 30-day Average Rolling 3-month average Quarterly average	1.5 $\mu g/m^3$ (state) 0.15 $\mu g/m^3$ (federal) 1.5 $\mu g/m^3$ (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 $\mu g/m^3$ = microgram per cubic meter ≥ = greater than or equal to
MT/yr CO2eq = metric tons per year of CO2 equivalents > = greater than

Revision: February 2011

ATTACHMENT D

Facility employee traffic and hazardous waste truck Emissions

	EMFAC2007 Emission factors for heavy duty trucks		Light duty vehicles	9 trucks @25 mi.	3 trucks @ 75 mi.	Employee vehicles	Total
	(lbs./hour)			(lbs/day)			
CO	**0.01112463**		**0.00826276**	5.0	1.4	3.5	9.9
NOx	**0.03455809**		**0.00084460**	15.6	4.3	0.4	20.3
ROG	**0.00279543**		**0.00085233**	1.3	0.3	0.4	2.0
SOx	**0.00003972**		**0.00001077**	0.0	0.0	0.0	0.0
PM10	**0.00166087**	**0.00151936**	**0.00008879**	1.4	0.4	0.0	1.8
PM2.5	**0.00144489**	**0.00139772**	**0.00005653**	1.3	0.7	0.0	1.9

Hazardous waste railcars Emissions

Cargo Weight (Rail Car and Freight)		
Volume Transported	20,000	gal/day
Gallons per railcar	20,000	gal
Number of Railcars	3.0	car/day
Rail car tare weight(1)	23.2	tons/one car
Weight of Product(3)	250.2	tons/day
Gross Weight	319.80	tons
Fuel Consumption		
Distance within CA inside of Air Basin	60	miles
Fuel Factor	1.329	gal/1000 GTM(2)
Total tons-mile	19188	ton-miles
Total Fuel consumption	25.50	gal/day

(1) Oteko, 2004. www.oteko.com

(2) GTM = gross ton miles

(3) Density of Product assumed to be 8.34 lb/gal

EMISSION FACTORS[4]	CO	VOC	NOx	SOx	PM10
gram/gallon	27.4	10.4	199.8	17	6.6
lbs/gallon	0.0604	0.0229	0.4405	0.0375	0.0146

(4) Emission factors are based on Emission Factors for Locomotives, U.S. EPA 420-F-97-05, December 1997, Table 9.

	EMISSIONS				
	CO	VOC	NOx	SOx	PM10
Within Basin (lbs/day)	1.540	0.585	11.233	0.956	0.371

Idling Emissions at Site[5]	EMISSIONS				
	CO	VOC	NOx	SOx	PM10
Locomotive Idling (lbs/day)	0.076	0.029	0.551	0.047	0.018

(5) Idling Emissions = Emission factor (lbs/gal) x Fuel Use (gal/hr) x Idling Time (hr/day)

Where: Fuel use = 5 gallons/hour and idling time is a maximum of 15 minutes per day.

TOTAL RAILCAR EMISSIONS	EMISSIONS				
	CO	VOC	NOx	SOx	PM10
Within Basin (lbs/day)	**1.616**	**0.613**	**11.783**	**1.003**	**0.389**

ATTACHMENT E
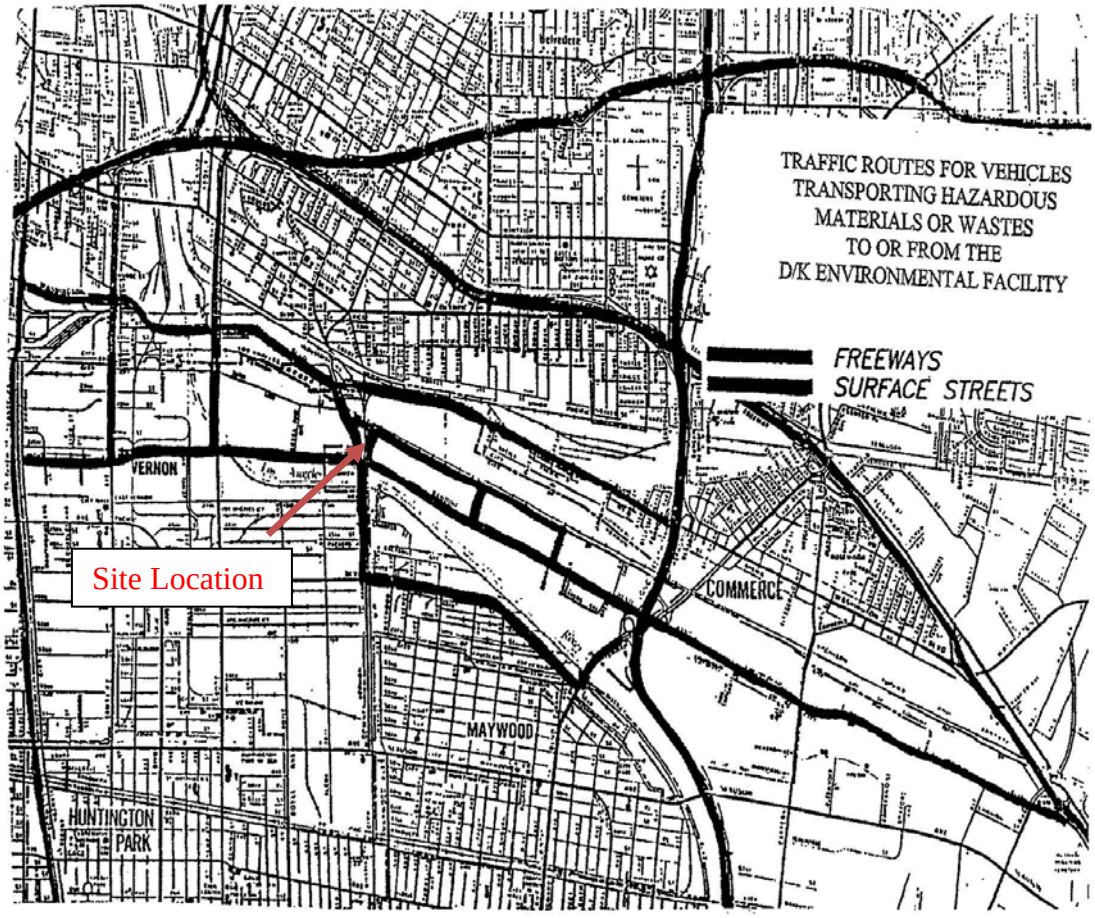
Figure A-10 External Traffic Plan