

**INITIAL STUDY
&
NEGATIVE DECLARATION**

Reconsideration of
Conditional Use Permit Case No. 441

Phibro-Tech, Inc.

Request for approval to allow the installation of a new treatment system for the treatment, storage, and transferring of oily wastewater

at 8851 Dice Road
Santa Fe Springs, California

October 2008

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1.0 PROJECT INFORMATION

1.	<p>File Number:1801.12 (500)</p> <p>Project title:</p> <p><u>Reconsideration of Conditional Use Permit Case No. 441 –</u></p> <p>The proposed project is a request for approval to allow the installation of a new treatment system for the treatment, storage, and transferring of oily wastewater at 8851 Dice Road, in the M-2, Heavy Manufacturing, Zone, within the Consolidated Redevelopment Project Area.</p>
2.	<p>Lead agency name and address:</p> <p>City of Santa Fe Springs 11710 Telegraph Road Santa Fe Springs, California 90670</p>
3.	<p>Contact person and phone number:</p> <p>Mr. Cuong Nguyen Associate Planner City of Santa Fe Springs (562) 868-0511, ext 7359</p>
4.	<p>Project location:</p> <p>The project site is located at 8851 Dice Road, in the City of Santa Fe Springs, Los Angeles County, California. The City is located approximately 13 miles southeast of downtown Los Angeles with neighboring cities of Whittier, La Mirada, Cerritos, Norwalk, Downey, and Pico Rivera (see figures: 1 – Vicinity Map; 2 – Local Map; and 3 – Site Plan).</p> <p>The approximately 4.8-acre site consists of an irregularly shaped parcel bordered to the north, west, and east by various industrial uses; a railroad spur is present directly south. The project site and adjacent properties are zoned (by the city of Santa Fe Springs) for industrial activities.</p>
5.	<p>Project sponsor's name and address:</p> <p>Mark Alling, Vice President and General Manager Phibro Tech, Inc. 8851 Dice Road Santa Fe Springs, CA 90670</p>
6.	<p>General plan designation:</p> <p>The City of Santa Fe Springs General Plan Land Use Map, provided as Figure 4, designates the project site as Industrial.</p>

7.	<p>Zoning:</p> <p>The City of Santa Fe Springs Zoning Map, provided as Figure 5, designates the project site as M-2, Heavy Manufacturing, Zone.</p>
8.	<p>Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)</p> <p>Refer to Section 2.0, Description of project.</p>
9.	<p>Surrounding land uses and setting: Briefly describe the project's surroundings:</p> <p>The subject property measures approximately 4.8 acres and is located on the west side of Dice Road, just north of the Union Pacific Railroad, at 8851 Dice Road. The subject property, as well as all surrounding properties to the north, south, east and west, are zoned M-2, Heavy Manufacturing. The properties to the north, east and west are developed with industrial, manufacturing or warehouse facilities. The property abuts the Union Pacific Railroad right-of-way to the south.</p> <p>Sensitive land uses near the subject site include single-family homes on the north side of Burke Street and Westman Avenue (approximately 1/5 mile north of the subject property), Aeolian Elementary (approximately 1/2 mile north of the subject property), and Los Nietos Elementary (approximately 3/4 mile northwest of the subject property).</p>
10.	<p>Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)</p> <p>In addition to the CEQA review, other approvals required to construct and operate the proposed project are:</p> <p><u>City of Santa Fe Springs:</u></p> <ul style="list-style-type: none"> • Reconsideration of Conditional Use Permit (CUP) Case No. 441 by City of Santa Fe Spring's Planning Commission to allow the installation of a new treatment system for the treatment, storage, and transferring of oily wastewater on the subject site; • Project-related construction plans. <p><u>Other Agencies:</u></p> <ul style="list-style-type: none"> • Renewal of existing Part B hazardous waste facility permit from the Department of Toxic Substances Control (DTSC).

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21177) and pursuant to Section 15063 of Title 14 of the California Code of Regulations, the City of Santa Fe Springs (City), acting in the capacity of the Lead Agency is required to undertake the preparation of this Initial Study to determine if the project proposed by Phibro-Tech, Inc. would have a significant environmental impact.

If, as a result of the Initial Study, the City finds that there is evidence that any aspect of the proposed project may cause a significant environmental effect, the City shall determine that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the City finds that there is no evidence that the project may cause a significant effect on the environment, the City shall find that the proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration. Such determination can be made only if “there is no substantial evidence in light of the whole record before the Lead Agency” that such impacts may occur (Section 21080, Public Resources Code). The City shall prepare a Mitigated Negative Declaration if a determination can be made that no significant environmental effects will occur because revisions to the project have been made or mitigation measures will be implemented that will reduce all potentially significant impacts to less than significant levels. In the preparation of this Initial Study, the Lead Agency determined that a Negative Declaration was appropriate for the proposed project (see Section 7.0).

The environmental documentation, which is ultimately approved and/or certified by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

The environmental documentation and supporting analysis are subject to a 30-day public review period. During this review, comments on the document relative to environmental issues are to be addressed to the City. These comments are anticipated to come from public agencies, public interest groups, and anyone else who has an interest in the project. Following review of any comments received, the City will consider these comments as a part of the project’s environmental review and include them with the Initial Study documentation.

1.2 PURPOSE

The purposes of this Initial Study are to:

1. Identify environmental impacts;
2. Provide the City with information to use as the basis for deciding whether to prepare an EIR, a Negative Declaration, or a Mitigated Negative Declaration;
3. Facilitate environmental assessment early in the project design;
4. Enable the City to modify the proposed project to ensure it will not result in a significant impact;
5. Provide documentation of the factual basis for the finding in the Negative Declaration that the proposed project would not result in a significant environmental effect; and
6. Determine whether a previously prepared EIR could be used for the project.

Section 15063 of the CEQA Guidelines identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

1. A description of the project, including the location of the project;
2. An identification of the environmental setting;
3. An identification of environmental effects by use of a checklist, matrix or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
4. A discussion of ways to mitigate significant effects identified, if any;
5. An examination of whether the project is compatible with existing zoning, plans, and other applicable land-use controls; and
6. The name of the person or persons who prepared or participated in preparation of the Initial Study.

1.3 **INCORPORATION BY REFERENCE**

Pertinent documents relating to this Initial Study/ Negative Declaration have been cited and incorporated, in accordance with Sections 15148 and 15150 of the CEQA Guidelines, to eliminate the need for inclusion of voluminous engineering and technical reports within the Initial Study. Of particular relevance are the previous Negative Declarations that present information regarding descriptions of environmental setting, future development-related growth, and cumulative impacts. With that said, this Initial Study/ Negative Declaration has incorporated by reference the following: *State of California Seismic Hazard Zones, Whittier Quadrangle Official Map; Maps of Known Active Faults; Department of Toxic Substance Control (DTSC) Part B Permit Application Instructions; Phibro-Tech, Inc. application for renewal of existing Part B hazardous waste facility permit with DTSC; Draft Health Risk Assessment prepared by ENSR Corporation for the proposed project; Draft 2007 Air Quality Management Plan from SCAQMD; 2000 Air Toxics Control Plan; City of Santa Fe Springs General Plan; Environmental Impact Report for the City of Santa Fe Springs Consolidated Redevelopment Project Area; Environmental Impact Report for the Villages at Heritage Springs project in the City of Santa Fe Spring; and the City of Santa Fe Springs Code of Ordinances.* These documents were utilized throughout this Initial Study/ Negative Declaration and are available for review at the City of Santa Fe Springs.

2.0 PROJECT DESCRIPTION

The City of Santa Fe Springs, acting as the Lead Agency, in cooperation with Phibro-Tech, Incorporated (PTI) and the Department of Toxic Substances Control (DTSC), has prepared and circulated this draft Negative Declaration to help identify and evaluate the potential environment impacts related to the proposed changes in design and operations on the subject property.

Phibro-Tech currently uses the property for the operation of an inorganic chemical manufacturing and recycling facility. The facility has operated on the subject property since the 1960's under Conditional Use Permit (CUP) 441. However, Phibro-Tech is proposing to add a new process to their existing operations. The proposed process will require Reconsideration of CUP Case No. 441 to allow the installation of a new treatment system for the treatment, storage, and transferring of oily wastewater. It should be noted that the existing inorganic chemical manufacturing and recycling facility that was already approved through the original CUP will remain the same and is not a part of this Reconsideration.

Concurrently, the Department of Toxic Substances Control (DTSC) is renewing a Hazardous Waste Facility Permit for PTI in accordance with Section 25200 of the California Health and Safety Code, Division 20, Chapter 6.5 and the California Code of Regulations, Title 22, Division 4.5. The PTI facility would be authorized to perform hazardous waste management activities under a Resource Conservation and Recovery Act (RCRA) equivalent permit as more fully described later in this description. PTI's hazardous waste management activities are fully described in the Operation Plan Part "A" and Part "B" Permit Application for Phibro-Tech, Inc. dated February 2006 (Part B Permit Application). These application documents have been amended several times to respond to DTSC comments and to provide other information. The most recent revision was submitted to DTSC in January 2008. The Part B Permit Application is incorporated herein by reference and is referred to as the February 2006 Application as amended. PTI was previously owned and operated by Southern California Chemical in accordance with Hazardous Waste Facility Permits issued by DTSC and the United States Environmental Protection Agency (USEPA) on June 19, 1991 and July 29, 1991, respectively.

It should be noted that the permit renewal project will also address ongoing corrective action activities as required by Section 3004 (u) of the Resource Conservation and Recovery Act (RCRA), which was amended by the Hazardous and Solid Waste Amendments of 1984, and 40 Code of Federal Regulations (CFR) 264.101 for permits issued after November 8, 1984. This includes but is not limited to addressing corrective action for releases of hazardous wastes

including hazardous constituents from any solid waste management unit (SWMU) at a facility, regardless of when the waste was placed in the unit.

FACILITY BACKGROUND / HISTORY:

The earliest use of the subject property was for a railroad switching station owned by Pacific Electric Railway Company. From the late 1940's to the early 1950's, a foundry casting facility operated on the land. Pacific Western Chemical Company then occupied the site from 1957 until December 1959. During that time, Pacific Western Chemical Company changed its name to Southern California Chemical. Ferric Chloride production commenced onsite in 1958. During the 1960's operations were added for copper recovery, copper oxide manufacturing, etchant processing, and other inorganic processes. In 1984, CP Chemicals, Inc. purchased the Facility. CP Chemicals, Inc. later changed its name to Phibro-Tech, Incorporated in 1994. Phibro-Tech, Inc. is currently a division of Phibro Animal Health Corporation.

The PTI Facility is a fully permitted hazardous waste treatment and storage facility. DTSC and USEPA granted Southern California Chemical operating permits on June 19, 1991 and July 29, 1991, respectively. Prior to this, the Facility operated under Interim Status. The state permit came up for renewal in July 1996. DTSC subsequently was granted full jurisdiction for permitting RCRA facilities in California; therefore, the separate USEPA permit is no longer needed. The facility submitted a Permit Renewal Application in 1996, which has been revised several times. The most recent revision was submitted to DTSC in January 2008. In accordance with DTSC procedures for permit renewal, the Facility is allowed to continue to operate under the terms of its 1991 permit pending the renewal of the permit.

Along with renewal of the existing permits, the PTI Facility has proposed the following modifications in the Part B Permit Application.

- Addition of some waste codes that have historically been used by generators to describe the waste materials currently permitted and managed in existing tanks and process/storage areas.
- Modification of existing treatment process to be conducted in existing permitted tanks.
- Addition of 9 new tanks for currently permitted treatment processes (two tanks will be removed from service), and conversion of three existing tanks from hazardous material service to hazardous waste service.
- Change in status of two current hazardous material product drum storage areas to be regulated under Part B permit as hazardous waste drum storage areas and designation of an area for unloading containers from trucks.

- Addition of 10 new tanks and three processing modules to store and treat oily waste water.

Because oily water constitutes an additional waste stream that would be accepted by the facility, new waste codes were, therefore, added to help describe oily water.

DTSC PERMIT RENEWAL:

The permit renewal process provides DTSC the opportunity to review the Facility's application and operational procedures for compliance with current requirements for hazardous waste management. PTI will be authorized to perform the activities summarized in a Hazardous Waste Facility Permit.

FACILITY OPERATIONS:

Current Operations

The PTI facility is essentially an inorganic chemical manufacturing plant using certain hazardous wastes as a primary raw material. The Facility is permitted to treat, store, and transfer both USEPA and California hazardous waste. Industrial wastes are currently shipped to the Facility for recycling and treatment from various industries including (but not limited to) the electronics, chemical, metal finishing, and aerospace industries.

The Facility recovers metals from inorganic waste streams, primarily spent metal plating and stripping etchants. Examples of waste types managed at the Facility include:

- Alkaline and acidic metal etchants, metal strippers, and metal finishing baths;
- Alkaline and acidic materials which include solids, slurries, and other metal containing materials;
- Other miscellaneous inorganic solutions and solids.

The RCRA air emission standards under 22 CCR Chapter 14, Article 27 for process vents and equipment leaks apply to facilities with process units conducting distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam stripping of wastes with organic content. These Article 27 standards are not applicable to the facility because it does not operate any such units.

The standard for equipment leaks under 22 CCR Chapter 14, Article 28 applies to facilities that handle wastes with at least ten (10) percent organic content. PTI's inorganic waste streams may include RCRA waste codes but will contain less than 10% organics. PTI believes the new oily water waste stream is not

subject to fugitive emissions monitoring and other requirements set forth in Article 28. To ensure compliance, however, PTI will comply with applicable requirements of Article 28 unless sufficient data on the waste stream demonstrates that these requirements are inapplicable.

The air emission standards for containers, tanks, and surface impoundments under 22 CCR Chapter 14, Article 28.5 apply to facilities that handle wastes with at least 500 parts per million by weight (ppmw) volatile organic compounds. Requirements for surface impoundments do not apply since the facility does not use any surface impoundments. PTI's inorganic waste streams would not be subject Article 28.5 since the waste streams processed will always contain less than 500 ppmw volatile organics. It is possible that PTI's new oily water wastes occasionally will exceed this limit, even though PTI does not intend to store and process such wastes in the O-Area. To ensure compliance, PTI will comply with applicable requirements of Article 28.5 unless sufficient data on the waste stream shows that this standard is inapplicable. This will include venting tank head space to carbon for removal of volatile organic compounds.

Proposed Operations

In addition to providing new facilities to enhance the existing inorganic chemical processing, PTI is proposing to install a new treatment system to treat, store, and transfer oily wastewater. Examples of processes generating oily wastewater streams include: tanker bilge water cleanout; contaminated storm water; oil spill cleanup; tank cleaning; metal working shops; petroleum industries; truck, sump, and clarifier cleanout; and general manufacturing or industrial activities generating oily water. Waste types include wastewater from these operations impacted with an organic/oily component, and may also contain solids. The wastewater may also contain metals that may be treated (after organic removal) in the Facility's existing metals recovery processes.

The proposed oily water process will handle up to 50,000 gallons per day and result in round trips to and from the Facility by up to 12 bulk delivery vehicles per day.

In summary, the RCRA air emission standards for process vents are not applicable to this facility and PTI will comply with the standards for equipment leaks and containers and tanks until it can be demonstrated that these are not applicable to this facility.

Existing Waste Treatment Processes

The Facility reclaims, recycles, treats, and stores hazardous waste using the following management options:

- **Copper Carbonate Process:** The recovery of copper from cupric chloride spent etchant (also called copper chloride) to make copper carbonate cake. Other waste streams (may also be treated in this process) and used as copper sources for the copper carbonate cake. Water, caustic soda, and sodium carbonate are added under controlled temperature conditions to precipitate the copper out of solution in the form of a copper carbonate cake product for ultimate sale into the marketplace.
- **Copper Oxide Process:** The recovery of copper from waste cupric chloride, spent alkaline etchant, and occasionally other copper sources such as copper nitrate, copper sulfate, or copper-bearing miscellaneous inorganic acids to make a copper oxide cake. Water and an alkaline material, such as sodium hydroxide or soda ash, are added under controlled temperature conditions in order to precipitate out a copper oxide cake product for ultimate sale into the marketplace.
- **Copper Sulfate Process:** The Facility receives spent copper sulfate and processes it to increase the concentration of copper sulfate to levels suitable for sale. This process reacts sulfuric acid with the spent copper sulfate (additional copper sources such as copper sulfate solids or copper sludge may also be used when necessary) to produce a copper sulfate solution product for sale into the marketplace.
- **Ferric Chloride Process:** There are two methods used in the ferric chloride process. One is to regenerate ferric chloride to make a higher purity ferric chloride and the other is metal or chloride enrichment of waste ferric chloride to increase its value to copper smelting operations. In the first case, copper and other metals are removed from the ferric chloride waste and the iron content is increased, while in the second case, the concentration of metal or chlorides are enhanced to enable the resulting material to be used as a substitute raw material for copper production. Note that production of higher purity ferric chloride is an existing operation at the Facility while metal or chloride enrichment of ferric chloride is an alternative process that utilizes existing treatment equipment. Note that all planned activities and waste management units are italicized throughout the text of this project description.
- **Primary Neutralization and Metals Recovery:** The treatment of inorganic, metal bearing wastes, which may achieve a reclaimed product for resale/reuse. Includes pH adjustment of alkaline and acidic wastes, either with other waste streams or with alkaline or acidic pH adjusting products. Chemical precipitation may also be used for metals recovery.
- **Wastewater Treatment:** Dilute metal-bearing wastewaters received from both on-site and off-site sources are treated at the Facility. Treatment methods include pH adjustment and the addition of coagulants, flocculants, and other precipitating agents. The resulting solids may then be recovered in a filter press and recovered for recycling as "Excluded Recyclable Material" for sale as product, or as a last resort for off-site transfer as a waste. The resultant non-hazardous wastewaters may then

be processed further to meet permit limits for discharge to the Los Angeles County Sanitation District, which is the local Publicly Owned Treatment Works (POTW). Alternatively, the wastewaters may be reused on site (e.g., for truck, rail car, or container rinsing, product washes, or for use in treating other wastes).

New or Modified Waste Treatment Processes

The following treatment processes are proposed to be added to the Facility in the 2006 Part B Permit Application as amended January 2008. Only the oily water processing involves acceptance of new waste streams and implementation of different treatment techniques than previously used at the Facility. For the most part, these changes are described in the Part B Permit Application.

- **High Solids Metal Recovery:** This waste treatment process may involve several types of chemical processes including precipitation, reduction, and/or oxidation and can be done in existing equipment. For chemical precipitation, a material is added to chemically convert metals in the waste from a soluble to an insoluble form. The insoluble precipitate is then removed through settling, decanting, and filtration. The Facility will use a variety of typical industrial reagents to carry out the chemical reduction and/or oxidation process. The laboratory will issue a recipe for the amount and type of materials to be used based on the material that is to be processed.
- **Oily Water Treatment System:** Oily water will be received into the newly constructed oily water treatment system. This process area will have various unit operations that can each be used on a given waste stream. The sequence of operations can be tailored to meet the specific treatment requirements of this highly variable waste stream. The treatment methods will include gravity separation (both unassisted in tanks and through an oil/water separator), the use of a Dissolved Gas Flotation (DGF) unit (including the addition of coagulants and flocculants), and/or a centrifuge. Where appropriate, resulting wastewater may be treated further in this area or in other on-site processes (for example, if necessary for metal containing wastewater), placed into holding tanks prior to discharge to the local POTW, or reused on site (e.g., for truck, rail car, or container rinsing, or for use in treating other wastes).
- **Container Washing:** When wastes are received in containers and the contents are transferred to storage tanks or into a reactor, a residue may remain in the containers. The Facility will wash these containers so they can be reused, recycled, or otherwise managed as a non-hazardous waste.
- **Truck/Rail Car Wash:** Washout of tanker trucks and rail cars after waste is delivered to the Facility. Rinse water is commingled with the aqueous

waste stream unloaded from the truck into the neutralization system or other appropriate permitted treatment process.

- **Waste Consolidation:** Containers of the same hazardous wastes may be consolidated into larger containers or bulk containers to facilitate the transfer of waste to another appropriately licensed facility for management. Bulk containers may also be consolidated or transferred (for example from rail to tanker truck and vice-versa). Bulk containers may also be offloaded to smaller containers such as drums or Immediate Bulk Containers (IBCs). This would occur when a waste is received in bulk that may require addition to the processes in small amounts or if it may not be suitable for tank storage (for example, it has an acid strength and type greater than that recommended for the materials of construction of the tank). The Facility may also receive lab pack wastes. These would be an accumulation of small waste containers that are managed through resorting and repackaging. Some consolidated wastes may be amenable for processing in an authorized waste management unit on site.

These treatment processes are expected to require five additional workers on site.

HAZARDOUS WASTE TYPES:

The Waste Analysis Plan (WAP) provided as Section C of the February 2006 Part B permit application as amended January 2008 provides details of the types of hazardous wastes currently or proposed to be accepted at the Facility. The RCRA and California (non-RCRA) hazardous waste codes listed in Tables C-1 and C-2 of the WAP are currently or are proposed to be accepted at the Facility for the indicated waste management options. The Facility accepts non-hazardous wastes as well as the following hazardous wastes for storage, treatment, and/or transfer:

- RCRA oxidizing (D001 – Department of Transportation (DOT) Hazard Class 5.1 only), corrosive (D002), and some toxic (D004-D011) wastes
- Some RCRA listed F, K, and U wastes
- California wastes as listed in Table C-2 of the WAP

Other wastes are received at the Facility, but are not treated. These waste streams are consolidated, stored, and/or transferred to other appropriate facilities.

The purpose of the WAP is also to facilitate safe and effective treatment of each waste managed by the Facility and minimize the potential for adverse chemical reactions resulting from mixing and handling potentially incompatible wastes.

The WAP provides procedures and controls that ensure that chemical and physical analysis is completed on a representative sample of each hazardous waste stream managed by the Facility.

The Facility does not accept the following types of hazardous waste for treatment or processing:

- Explosives wastes (DOT Hazard Class 1)
- Compressed Gasses (DOT Hazard Class 2)
- Flammable wastes (DOT Hazard Class 3 and 4)
- Infectious wastes (DOT Hazard Class 6.2)
- Radioactive wastes (DOT Hazard Class 7)
- Reactive wastes (as described in 22 CCR 66261.23(a))
- Pesticides
- Dioxins
- Bio-hazardous Waste
- Pyrophoric Wastes
- Polychlorinated biphenyls (PCBs)
- California waste codes not included on Table C-2
- RCRA wastes with 500 parts per million (ppm) or greater of volatile organic compounds unless compliance can be maintained with 22 CCR, Chapter 14, Article 28.5 standards
- Hazardous Wastes of Concern as defined in 22 CCR 66261.111

WASTE HANDLING AND STORAGE:

The Facility can receive, store and process wastes in either bulk loads (e.g., tanker trucks, rail cars, etc.) or containers (e.g., 55-gallon drums, intermediate bulk containers (IBC's), etc.). The wastes are transported to the Facility by properly licensed transporters. Wastes received at the Facility may be sampled and analyzed to evaluate the chemical and physical properties of each waste stream, and the conformity of the load with the original paperwork. All containers manifested to the Facility are inspected and assigned a unique tracking number, which is marked on the container using a bar code label. The containers may be stored within a designated storage area prior to transfer to the assigned process area. The storage areas are equipped with secondary containment and designed so that incompatible wastes (e.g., strong acids with strong bases) are segregated. Section E - Process Operations of the February 2006 Part B permit application as amended January 2008 provides detailed descriptions of both current and proposed on-site hazardous waste receiving operations.

Waste Stream Characterization

Waste streams received from off site are characterized by a waste profile form prior to receipt at the facility. The generator completes (or provides sufficient information to allow the Facility to complete) a waste characterization (profile) form and submits it to the Facility. The profile form describes the waste stream and its pertinent physical and chemical characteristics, the process generating the hazardous waste, and also identifies all applicable state and federal hazardous waste codes. It is the generator's responsibility to provide accurate information. Incoming waste is also evaluated to verify that the contents of each hazardous waste shipment match the identity (e.g. proper shipping name, hazard class, and waste code) of the hazardous waste as specified on the manifest and determined under the pre-acceptance process described above. This is called the waste receipt analysis process.

Container Storage Area

Containerized non-bulk wastes received from off site are stored in one of the four Container Storage Areas: CS-1, CS-2, CS-3, or CS-4. CS-1 and CS-2 are existing areas and were previously called ERS #1 and ERS #2, respectively. CS-3 and CS-4 are new areas built in 2001 to manage hazardous material product chemicals produced at the Facility. They are proposed to allow both storage of hazardous waste or hazardous chemical products or a combination of both. See Figure B-2 for locations of the container storage areas. Drums in the containment areas are typically handled on pallets with three or four drums per pallet and will be stacked in accordance with DTSC and Santa Fe Springs Conditional Use Permit and Hazardous Material Storage Permit conditions. A minimum aisle space of 24 inches is maintained between rows to provide access to each drum in the facility for inspection. The capacity of each container storage area has been determined based on the requirement to contain a minimum of 10% of the combined capacity of the containers, or the total volume of the largest container, whichever is greater, plus the accumulated rainfall from a maximum 25-year, 24-hour storm event since all container areas are uncovered.

Hazardous Waste Treatment and Storage in Tanks

Tanks are located within concrete, chemically impervious secondary containment systems in one of six designated containment areas, Areas C, S, F, J, W, and O. The tanks are constructed of either fiberglass reinforced plastic (FRP), titanium or carbon steel. The FRP tanks are used for the treatment and storage of inorganic wastes and wastewater and will have various resin systems or liners based on the wastes to be handled. Both FRP and titanium are compatible with the inorganic wastes to be stored as described in Section D5.3 of the Part B application. All inorganic tanks at the Facility are operated only at or near atmospheric pressure, except for tanks C-1C and C-1D. These tanks are constructed of titanium and are designed to handle pressures slightly above atmospheric. All hazardous waste storage tanks are equipped with vents

designed to avoid excessive positive or negative pressures beyond design limitations in the tanks that can arise during loading, unloading, and process operations. Tank venting for most tanks (the FRP tanks) is provided through small openings on the top of the tank. Some tanks, such as reactors C-1A through C-1D, are vented to scrubber systems operated under local air district permits. These will help control pressure in the tanks, as excess pressure will vent through the scrubber system. Complete tank closure and the subsequent conservation vents and/or vacuum/pressure relief systems are not required since the Facility does not handle volatile organic wastes. Conservation vents and/or vacuum/pressure relief systems are used on the two titanium tanks so that they can operate safely at a pressure slightly above atmospheric. The shapes of tanks include flat bottom, domed, and sloped bottomed. Tanks in oily-water processing service, including storage of recovered oil, will be made of carbon steel. It should also be noted that tanks that contain liquids with a flash point are required to meet UL 142 listing requirements. Carbon steel will not be affected by the hydrocarbon constituents. The tank design will allow sufficient corrosion allowance for an estimated 15 year life. All treatment and storage tanks are currently certified as required by California Code of Regulations title 22 sections 66264.192 and 66264.196 by a professional engineer registered in California.

On-Site Waste Transport

On-site waste handling and movement is described in detail in Section E14 of the February 2006 Part B permit application as amended January 2008, and includes general procedures for:

- Unloading containers from vehicles
- Movement of containers in the facility
- Transferring liquid waste from containers
- Solid waste in containers
- Tank truck unloading/loading of bulk liquids
- Rail car unloading/loading
- Transferring liquids within the facility.

Only trained and designated Facility personnel are qualified to perform these activities; at times the operation may be performed by a qualified subcontractor.

Off-Site Waste Transport

Off-site waste handling and movement is described in detail in Section E14 and Section I3 of the February 2006 Part B permit application as amended January 2008. Chemical wastes are hauled off-site by Phibro-Tech owned vehicles or by several private waste hauler companies. Waste trucks enter and leave the Facility plant site through the main gate at Dice Road. Typically, hazardous wastes are shipped off site for disposal or recycling using 45 foot enclosed van

trailers, stake side flatbeds, bobtail enclosed van, tanker trucks, or rail cars as required depending on the waste types to be shipped. Placards are placed on the vehicles/rail cars when necessary as prescribed by United States Department of Transportation (DOT). The number of vehicles used to transport wastes over a given time frame fluctuates due to the variability of process batch operations and ongoing waste minimization efforts. Bulk hazardous waste destined for off-site transport is loaded on to registered licensed hazardous waste hauler vehicles under the supervision of qualified PTI staff. Prior to loading operations, authorized PTI personnel must visually check the tanker and fill equipment. A proper manifest will be filled out for all wastes shipped off-site.

For outgoing shipments on rail cars, the authorized PTI rail car operator will prepare the shipping papers and perform an inspection sheet to verify that all flanges, gaskets, covers, valves, and rupture discs are secure and acceptable. The specially trained individual will perform rail car loading and unloading only in one of the two designated areas for such activities. These areas have containment pans that can take any minor releases from the loading/unloading operations that can then be pumped into one of the authorized storage tanks. All hazardous waste railcars will be top loaded and off-loaded using a pump. This significantly reduces the risks of large quantity spills from railcar loading and unloading operations.

GROUNDWATER PROTECTION PROGRAM:

Degradation of ground and surface water quality at the Facility is prevented through operation of hazardous waste management units, primarily by secondary containment systems, to prevent releases to the environment or endangerment of public health. Design specifications for secondary containment systems can be found in Section D for container storage, tank, and process areas. PTI has procedures in place to mitigate, control, and clean-up releases to the environment and to prevent contamination of water supplies (see Section G, Contingency Plan).

Groundwater sampling and analysis has been conducted at the facility since March 1985. The current monitoring program has been conducted under USEPA oversight since 1990 per the RCRA Facility Investigation Work Plan dated June 8, 1990. As sampling and analytical procedures have changed significantly during the past 15 years, a Water Quality Sampling and Analysis Plan has been prepared to provide an updated sampling and analysis plan for routine groundwater monitoring at the facility. Three types of contaminants have generally been detected in the groundwater beneath the site: dissolved metals, non-chlorinated aromatic volatile organic compounds (VOCs) and chlorinated VOCs. The objective of the monitoring is to determine if compounds of concern

detected in groundwater beneath the site are migrating from the facility, are related to upgradient sources, and/or are naturally attenuating.

FACILITY SAFETY AND EMERGENCY EQUIPMENT AND PROCEDURES:

The Facility retains an up-to-date Emergency Contingency Plan. The Facility contingency plan describes the actions and procedures personnel working at PTI must follow in the event of a fire, earthquake, explosion, or a sudden or non-sudden release of hazardous waste. The plan was developed to enable personnel to respond immediately when any elements of the hazardous waste management system are actually or potentially threatened. Objectives of the contingency plan are to minimize hazards to public health or the environment from fires, explosions, or any unplanned, sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil, or surface water. Current copies of this plan are kept at the Facility at all times and are distributed to the appropriate public agencies and emergency response providers. In addition, the City of Santa Fe Springs Fire Department conducts familiarization tours on a periodic basis.

Appropriate personal protective equipment is provided as appropriate to staff duties. Emergency equipment includes items such as: goggles, gloves, boots, safety shoes, aprons, face shields, telephones, radios, fire extinguishers, and first aid supplies. In addition, eyewash/safety showers are located in close proximity to the work station in each area where hazardous waste is handled or stored. Other equipment available includes: self-contained breathing apparatus, chemical resistant clothing, transfer pump, wind socks, ammonia sensors, manual emergency ammonia shut-off, and air horns. Some of the items are stored inside the emergency response trailer located near the parking lot on the east end of the Facility and near the proposed new truck unloading containment pad. When confined space entry is required, Phibro-Tech adheres to a Cal/OSHA compliant procedure. Warning signs are posted in hazardous waste storage areas in both Spanish and English.

FACILITY SECURITY:

The Facility is surrounded by a chain-link fence generally from eight to twelve feet high. The Facility has five access gates that remain closed and locked except when a shipment or delivery is being loaded/unloaded. These include a pedestrian entrance (chain link door), 2 truck gates, and 2 rail gates. Access to the Facility is strictly controlled by guard during primary business hours. Main truck access to the Facility is through a locking, electronic gate accessed by Dice Road. A security guard is on duty during peak operating hours and controls access through the main gate. Employee access to the plant is restricted to those assigned card-keys that activate an entrance door adjacent

to the main gate. When inside the plant, employees monitor for unauthorized personnel that may be present. When the Facility is not in operation, all access gates remain closed and locked and a guard is on duty at the front gate.

All visitors/drivers are required to sign in; are given (and are required to sign-off on) a list of on-site hazards; are given appropriate personal protective equipment (i.e., safety glasses, hardhat) if necessary; and are escorted by appropriate Facility personnel. In addition, the plant is illuminated at night by outdoor lighting.

FACILITY INSPECTIONS:

Facility inspections are conducted regularly to prevent, detect, or respond to environmental or human health hazards. Inspections address the following items: safety and emergency equipment, security equipment, operational (including monitoring) equipment, container storage areas, load/unload areas, and tank systems. The frequency of inspection is based on the rate of possible deterioration of equipment and structures, and the probability of an environmental or human health incident if an unsatisfactory condition (e.g., deterioration, malfunction, or operator error) goes undetected between inspections. Inspection frequencies are generally as follows:

- Safety, security, emergency, alarm and communication equipment is checked weekly, monthly, and as used. Equipment is checked for access and operability in the event of an emergency.
- Operational equipment is inspected before use to ensure safe operation, and regularly scheduled servicing is completed to maintain the equipment in good operational condition.
- Sumps and secondary containment structures provided for all tank systems, load/unload areas, and treatment systems are visually inspected daily and weekly to detect leaks, spills, or accumulated liquids (as required by 22 CCR 66264.15). Accumulated liquids typically will be removed by the end of the 8-hour shift in which they were detected, and will be removed within 24 hours of discovery. The inspection logs will note the time accumulated liquids were discovered and removed. Removal of precipitation will typically be completed within 24 hours after the end of a rainstorm. All secondary containment systems are inspected daily (tanks) or weekly (all other) to detect the presence of cracks or deterioration of concrete and the accumulation of dirt or other materials that may prevent the inspection of concrete.
- Hazardous waste container storage and processing areas are inspected weekly for leaks, spills, proper stacking arrangements, aisle spacing, and the segregation of incompatible materials. Also, containers are inspected for any signs of physical deterioration or corrosion, and labels are

checked to ensure they are visible and legible (as required by 22 CCR 66264.174).

- Hazardous waste tank storage and processing systems, including tanks, process equipment, load/unload areas, secondary containment structures, and ancillary equipment, are inspected daily for signs of corrosion, weld breaks, punctures, spills, and secondary containment erosion or deterioration. Overfill control equipment is also inspected to ensure good working order at least once each operating day. Procedures to assess the structural integrity of tanks over time (e.g., corrosion, cracking, wall thinning) are addressed in Section F4, Tank Condition Assessment.

In cases where specialized outside contractors are needed to perform specific inspections (e.g., alarm systems), the results will be reported on the contractor's inspection forms, checked off on the PTI inspection form, and retained in the operating record.

ENVIRONMENTAL, HEALTH AND SAFETY TRAINING PLAN:

All employees who may be required to participate in hazardous waste operations (treatment, storage, or other hazardous waste handling) are supplied with the information and experience that they need to perform their duties in a manner which is safe and in compliance with applicable regulations. Administrative employees also receive instruction including implementation of aspects of the contingency plan, emergency escape routes, alarms, and rally points. They also receive training in the use of fire extinguishers. Table H-1 in Section H of the February 2006 Part B permit application as amended January 2008 provides an example training matrix listing requirements that employees may be required to complete based on his or her job function. In general, topics include:

- New Hire Orientation
- Workplace Safety
- Environmental Aspects and Impacts
- Lockout-Tagout General Training
- QSI Software
- Management Systems Training
- Waste Analysis Plan - Certification
- Contingency Plan - Certification
- Record Keeping Manifests -Certification
- RCRA - Certification
- PSM-RMP - Certification
- PPE - Certification
- Lock Out Tag Out - Certification

- Confined Space - Certification
- Forklift Training - Certification
- Fall Protection
- Respiratory Protection - Certification
- Respirator Fit Test - Certification
- Chemical Hygiene - Certification
- Hot Work Permit - Certification
- Hearing Conservation General Training
- Fire Extinguisher Training - Certification
- HM-126F -Certification
- First Aid, CPR, and Bloodborne Pathogens Certification
- HAZCOM -Certification
- 24-Hour HAZWOPER Training
- Incident Reporting

OPERATING RECORD:

The Facility maintains an operating record which includes information such as waste receipts, where they are stored, and when and how they are processed. A full description of the operating record is in Section I of the February 2006 Part B permit application as amended January 2008.

In addition to the operating records, annual reports and other certifications are required and documentation is maintained. This includes an annual certification that PTI has a program in place to reduce the volume and toxicity of hazardous waste that PTI generates to the degree determined by PTI to be economically practicable; and the proposed method of transfer, treatment, storage or disposal is that practicable method currently available to PTI which minimizes the present and future threat to human health and the environment.

FACILITY CLOSURE PLAN AND FINANCIAL RESPONSIBILITY:

The Facility has prepared a Closure Plan in accordance with the requirements of 22 CCR 66264.110 et seq., 40 CFR Part 264, Subpart G, and related guidance. The Closure Plan is provided as Volume 2 to the Part B application and was submitted in March 2006 and amended January 2008. The Closure Plan was prepared for use by PTI to close the Facility at some time in the future when it ceases to accept and process hazardous waste. Closure will be performed in a manner that: 1) minimizes the need for further maintenance and controls, and 2) minimizes or eliminates to the extent necessary to protect human health and the environment, the post-closure release of hazardous constituents, leachate, contaminated rainfall and runoff or hazardous waste decomposition products to the ground, surface waters, or to the atmosphere.

In accordance with applicable regulations, PTI must meet financial responsibility requirements for closure and liability coverage on an annual basis. Current documents have been approved by DTSC.

SITE REMEDIATION / CORRECTIVE ACTION ACTIVITIES:

A RCRA Facility Assessment (RFA) was completed by USEPA Region IX in July 1987. The RFA determined that corrective action was necessary because of past releases of hazardous materials to the subsurface beneath the Facility. A Consent Order requiring RCRA corrective action was negotiated with USEPA and signed on December 8, 1988. The Consent Order contains specific requirements for conducting a RCRA Facility Investigation (RFI) and Corrective Measures Survey.

An RFI was performed and summarized in an April 1992 report titled Comprehensive Environmental Review, Southern California Chemical, by Camp Dresser & McKee, Inc. (CDM). The RFI showed that there is soil and groundwater contamination at the facility. Most notably, the contamination consisted of heavy metals and hexavalent chromium was found in the groundwater. In 1992, A Corrective Measures Study (CMS) workplan was completed and approved by USEPA on March 31, 1992. The CMS described the corrective measures to be implemented at the facility to clean up the soil and groundwater contamination. When the CMS was completed, the requirements of the 1988 USEPA Consent Order had been satisfied. At this time, DTSC became the lead agency in charge of oversight of the selected corrective measures. Consequently, DTSC required the selected corrective action activities be added as permit requirements to the RCRA Hazardous Waste Treatment and Storage permit by a Class 3 Permit Modification on June 30, 1995 (1995 CAPM). Therefore, the 1995 CAPM is the document currently governing corrective action activities at the Facility. The 1995 CAPM is incorporated herein by reference.

The following is the status of each activity required by the 1995 CAPM. These requirements are listed in Section E of the 1995 CAPM:

- A deed restriction was filed with Los Angeles County on August 16, 1995 which covers all requirements of the 1995 CAPM. The deed restricts the use of the property for residences, schools, hospitals, hotels, day care, playgrounds, and parks. It disallows the use of shallow groundwater for domestic purposes. Requires the property to remain fully paved with regular inspections and maintenance in a manner that prevents infiltration of liquids into subsurface soils. And restricts construction on the site such that excavation of soil is minimized and to requires adequate health and safety plans and notification to DTSC of such plans.

- A Corrective Action Vadose Zone Monitoring Work Plan was submitted by CDM to DTSC on June 15, 1998. The vadose zone monitoring plan will allow for early detection of leakage from sumps and other subsurface units at the facility and therefore provide early detection of contaminant migration from these units. The Corrective Action Vadose Zone Monitoring Work Plan is currently under review.
- A Groundwater Remediation Work Plan was submitted December 15, 1997 and per DTSC request a follow up pilot study work plan was submitted June 29, 2001. DTSC commented on the work plan on January 16, 2002. In order to determine the specifics of an effective groundwater remediation system, a Site Conceptual Model (noted below) was prepared to provide a more definitive description of the groundwater contamination. With this new information, the facility is required to redevelop a groundwater remediation work plan.
- A Corrective Action Containment Systems Report was submitted by PTI to DTSC on March 7, 2002, revised per DTSC comments on February 26, 2003 and July 22, 2003 and approved by DTSC on September 23, 2003. The containment system report described the facility site wide pavement system required by the deed restriction (noted above). The deed restriction requires the property to remain fully paved with regular inspections and maintenance in a manner that prevents infiltration of liquids into subsurface soils.
- A Corrective Action Financial Assurance Plan ("CAFAP") is required by the 1995 CAPM to plan for and cover the cost of implementing corrective action activities at the facility. PTI submitted this plan to DTSC on December 9, 2004. DTSC reviewed the plan and provided comments to the facility along with a request for funding to be set aside to cover the corrective action activities. The facility requested funding will be set aside for DTSC so that, should the facility go out of business, DTSC will have the funds necessary to implement the remaining corrective action activities.
- A Final Site Conceptual Model was submitted to DTSC on March 9, 2005 and approved by DTSC on April 18, 2005. The site conceptual model describes the contamination on site, where it may have come from and, if it is mobilized, where it is expected to travel. Thus providing a description of any potential threats the current site contamination may pose to human health and the environment.
- A Corrective Action Site Cover Operation, Maintenance, and Inspection Plan was submitted by the PTI to DTSC on June 15, 1998 and revised on January 11, 2002. DTSC requested a series of subsequent revisions and approved the document on June 2, 2005. This plan describes the specific activities required to ensure the deed restriction (noted above) requirements that the property remains fully paved with regular

inspections and maintenance in a manner that prevents infiltration of liquids into subsurface soils. The plan also specifies surface water sampling requirements.

- A Soil Vapor Extraction ("SVE") Work Plan was submitted by CDM to DTSC on February 16, 1998 and was accepted by the DTSC after a February 22, 2001 revision (the formal revised version of the SVE work plan was submitted by CDM to DTSC on January 9, 2002 to complete DTSC's files). The SVE fieldwork approved under this work plan was performed at the Facility on March 3-4, 2001. After completion of SVE survey described in the work plan ("Phase 1"), CDM submitted a report to DTSC on April 6, 2001. A "Phase 2" SVE Survey and SVE Pilot Test Work Plan was submitted by CDM to DTSC on October 17, 2001. On March 20, 2002, a request was made by CDM on behalf of the Facility to submit a combined Phase 2 SVE and Bio-venting Work Plan. DTSC agreed to this request to combine the Phase 2 SVE and Bio-venting Work Plan. On June 23, 2004 a Generic Soil Vapor Survey Work Plan, which serves as a companion document to the SVE Work Plan submitted to DTSC on January 9, 2002, was submitted to DTSC. A Phase 2 Soil Vapor Survey was conducted at the Facility in January 2005. A Comprehensive Soil Vapor Survey and SVE Pilot Test Work Plan was submitted to DTSC on September 30, 2005. CDM clarified with DTSC in October 2005 that the proposed soil vapor extraction in this work plan also covers the bio-venting requirements for the former underground storage tank area effectively combining the SVE and Bio-venting efforts as requested and approved. This effort is necessary to address soils contaminated with Halogenated Volatile Organic Compounds and gasoline and diesel spills from former underground storage tanks. A final SVE system design package was submitted to DTSC on May 8, 2008. The design was approved and the system currently is being constructed.
- A Groundwater Monitoring Work Plan was submitted by Camp Dresser and McKee (CDM) to DTSC on September 29, 1995. Groundwater monitoring is currently performed and reported on a quarterly basis. Per DTSC comments provided on June 21, 2005, a revised draft Water Quality Sampling and Analysis Plan was submitted to DTSC on November 14, 2005. Groundwater monitoring is necessary to assess the contamination present in the ground water beneath the site and its potential impacts on human health and the environment. Upon approval of the revised draft Water Quality Sampling and Analysis Plan, it will become a part of the PBPA and will become a condition for the renewed permit, replacing the existing groundwater monitoring plan.
- DTSC informed PTI by letter on April 11, 2002 that Pond 1 could be closed (capped) leaving waste (contaminated soil) in place after removal (characterization and disposal) of the Pond 1 containment structure. Removal of the Pond 1 containment structure will cause operational

difficulties at the Facility, as it will require the relocation of the wastewater treatment system, which is currently located inside Pond 1. Historically, Pond 1 was used for neutralization of high pH (10-14) effluent of onsite treatment processes by metal bearing acids. Thus the soils beneath the concrete base of Pond 1 are expected to contain heavy metals. Upon completion of closure, this unit will be capped and subject to post closure care to prevent any potential infiltration of liquids from carrying the potential subsurface soil contamination into the groundwater. Groundwater monitoring is required as described above to address the issue of groundwater contamination.

- An approved 1988 Modified Closure/Post-Closure Plan provides for closure of Pond 1. PTI has begun implementing the 1988 Modified Closure/Post-Closure Plan for closure of Pond 1. As Pond 1 is currently being used as secondary containment for Waste Water treatment tanks, These tanks must be relocated before Pond 1 can be closed. On January 31, 2006 PTI submitted a Tank Relocation Plan to DTSC.
- A revised Hazardous Waste Facility Closure Plan was submitted on June 17, 2002 (and updated with the Part B permit application submittals). Based on the updated closure activities in the revised closure plan, the closure cost estimate has been substantially increased. The facility has provided a letter of credit to DTSC so that, should the facility go out of business, DTSC will have the funds necessary to implement the Closure Plan.
- Pursuant to the 1995 CAPM, the Facility is required to undertake the following in the event that any new solid waste management units ("SWMUs"), potential or immediate threats, or newly identified releases are discovered at the Facility:
 - Notify DTSC orally within 72 hours of discovery;
 - Notify DTSC in writing within 7 days of discovery, summarizing findings and magnitude of potential threat(s) to human health and/or environment. DTSC may then require the Facility to investigate, mitigate, or take other appropriate action to address any immediate or potential threats to human health and the environment. DTSC may require the submittal of documents (work plans, etc.) which explain how the Facility will take action to address the immediate or potential threats. Pursuant to section E.13.a. of the 1995 CAPM, remobilization of existing soil contamination is considered a new release. PTI has not notified DTSC of any new releases to date.

The DTSC selected remedy for soil corrective action is SVE. A SVE system currently is being constructed at the Facility and is scheduled to begin operation

in October 2008. An alternative groundwater remedy has been bench-scale tested and is currently in the final stage of RWQCB permitting for a pilot scale test. DTSC has approved the pilot scale testing program and, if successful, a full-scale system will be proposed as an alternative remedy for groundwater.

3.0 INITIAL STUDY CHECKLIST

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, as indicated by the checklist on the following pages. Mitigation measures would have been developed for any environmental factors found to have a "Potentially Significant Impact", to reduce the impacts to a less than significant level. However, all environmental factors for the proposed project were found to have either a "Less than Significant Impact" or "No Impact" on the environment.

	Aesthetics		Land Use Planning
	Agricultural Resources		Mineral Resources
	Air Quality		Noise
	Biological Resources		Population and Housing
	Cultural Resources		Public Services
	Geology and Soils		Recreation
	Hazards and Hazardous Materials		Transportation/Traffic
	Hydrology and Water Quality		Utilities and Service Systems
	Mandatory Findings of Significance		

3.2 EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated in this Initial Study include:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities and Service Systems

The environmental analysis in this section makes use of the checklist recommended by the CEQA Guidelines for the environmental review process. As a preliminary environmental assessment, this Initial Study determines whether or not potentially significant impacts exist that warrant additional analysis and comprehensive mitigation measures to minimize the level of impact. On-site, off-site, long-term, direct, indirect, and cumulative impacts are analyzed for the construction and operation of the proposed project. The Initial Study poses questions with four possible responses for each question:

- **No Impact.** The environmental issue in question does not apply to the project, and the project will therefore have no environmental impact.
- **Less Than Significant Impact.** The environmental issue in question does apply to the project site, but the associated impact will be below thresholds that are considered to be significant.
- **Potentially Significant Unless Mitigated.** The project will have the potential to produce significant impacts with respect to the environmental issue in question. However, mitigation measures modifying the operational characteristics of the project will reduce impacts to a less than significant level.
- **Potentially Significant Impact.** The project will produce significant impacts, and further analysis will be necessary to develop mitigation measures that could reduce impacts to a less than significant level.

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?				✓
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			✓	
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				✓
II. AGRICULTURAL RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
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?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				✓
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			✓	
c) Result in a 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 that exceed quantitative thresholds for ozone precursors)?			✓	
d) Expose sensitive receptors to substantial pollutant concentrations?			✓	
e) Create objectionable odors affecting a substantial number of people?			✓	
f) Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.)?			✓	

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
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?				✓
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 US Fish and Wildlife Service?				✓
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?				✓
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?				✓
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
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?				✓
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historic resource as defined in § 15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			✓	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?			✓	
d) Disturb any human remains, including those interred outside of formal cemeteries?			✓	
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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.			✓	
ii) Strong seismic ground-shaking?			✓	

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?			✓	
iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?			✓	
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?			✓	
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?			✓	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Be located in an area containing naturally occurring asbestos (see also Air Quality, f.)?				✓
VII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
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?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✓	
d) Be located on a site that 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 the public or the environment?				✓
e) Result in a safety hazard for people residing or working in the project area, for a project located within an airport land-use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport?				✓
f) Result in a safety hazard for people residing or working in the project area, for a project within the vicinity of a private airstrip?				✓
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				✓
VIII. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?			✓	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit 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 that would not support existing land uses or planned uses for which permits have been granted)?			✓	
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 that would result in substantial erosion or siltation on- or off-site?			✓	
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 that would result in flooding on or off site?			✓	
e) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			✓	
f) Otherwise substantially degrade water quality?			✓	
g) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✓
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?				✓
i) 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?			✓	
j) Cause inundation by seiche, tsunami, or mudflow?				✓
IX. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?				✓
b) 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?				✓
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				✓

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
X. MINERAL RESOURCES – Would the project:				
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?				✓
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?				✓
XI. NOISE – Would the project result in:				
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?			✓	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			✓	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	
e) Exposure of people residing or working in the project area to excessive noise levels, for a project located within an airport land-use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport?				✓
f) Exposure of people residing or working in the project area to excessive noise levels, for a project within the vicinity of a private airstrip?				✓
XII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓
XIII. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental 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?			✓	

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
Parks?			✓	
Other public facilities?				✓
XIV. RECREATION				
a) Would the project 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?				✓
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				✓
XV. TRANSPORTATION/TRAFFIC – Would the project:				
a) Cause an increase in traffic that 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)?			✓	
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			✓	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				✓
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
e) Result in inadequate emergency access?				✓
f) Result in inadequate parking capacity?			✓	
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			✓	
XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			✓	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			✓	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				✓

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				✓
g) Comply with federal, state, and local statutes and regulations related to solid waste?				✓
XVII. FINDING OF DE MINIMIS IMPACT TO FISH, WILDLIFE, AND HABITAT – The following provides substantial evidence as to why the project will have no potential adverse effect on the listed resources as defined by section 711.2 of the Fish and Game Code:				
a) Riparian land, rivers, streams, watercourse, and wetlands under state and federal jurisdiction.	No potential for adverse impact.			
b) Native and non-native plant life and the soil required to sustain habitat for fish and wildlife.	No potential for adverse impact.			
c) Rare and unique plant life and ecological communities dependent on plant life.	No potential for adverse impact.			
d) Listed threatened and endangered plant and animals and the habitat in which they are believed to reside.	No potential for adverse impact.			
e) All species of plant or animals listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulation adopted there under.	No potential for adverse impact.			
f) All marine and terrestrial species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside.	No potential for adverse impact.			
g) All air and water resources the degradation of which will individually or cumulatively result in a loss of biological diversity among the plants and animals residing in that air and water.	No potential for adverse impact.			

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE – Does the project:				
a) 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) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a 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) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?				✓

4.0 ENVIRONMENTAL ANALYSIS

4.1 AESTHETICS

Would the project:

a) *Have a substantial adverse effect on a scenic vista?*

No Impact. The subject site, and the surrounding area, is not on or near any designated scenic vistas. Other than existing landscaping, there are no natural rock outcroppings or other scenic resources on or around the site. Additionally, it should also be noted that the subject site is located along Dice Road between Altamar Place and Burke Street; neither of these roadways has been designated as a State Scenic Highway. Moreover, the City's General Plan does not designate these roadways or any adjoining or nearby roadways as a "Scenic" Highway. Therefore, project implementation is not expected to obstruct any scenic vistas or scenic highways.

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

No Impact. See response 4.1.a

- c) *Substantially degrade the existing visual character or quality of the site and its surroundings?*

Less Than Significant Impact. The subject site is currently developed with an inorganic chemical manufacturing and recycling facility. The present views across the subject site will not substantially change as a result of the proposed project. The site is already occupied by a combination of at least 65 existing tanks, drums and various containers.

Although the project involves the addition of 10 new aboveground storage and/or treatment tanks and three processing components to store and treat oily wastewater, and six new tanks for current inorganic waste streams, the new tanks and processing components are not expected to substantially degrade the visual character or quality of the site or its surroundings. The new aboveground tanks and processing components will blend in with the existing containers and processing components since they will have similar exterior design features, such as height, color, and massing. Additionally, three existing tanks that are being converted from hazardous material use to potential hazardous waste use will remain as they are and have no change in visual character.

Nevertheless, the new tanks and processing components will be setback approximately 370' from Dice Road. Additionally, there is currently a landscape screen along Dice Road and the driveway entrance of the subject property. Moreover, the rest of the site is screened with a perimeter fence with eight to twelve feet tall slats. Therefore, given the proposed setback, existing landscape screen and perimeter fencing, the new tanks and processing equipment will not be directly visible from the street. Impacts to the existing visual character and quality of the site and its surroundings are therefore expected to be less than significant.

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

No Impact. Given that the subject site is currently developed with an inorganic chemical manufacturing and recycling facility, some existing lighting is already in place. If additional lighting is required for project, both Planning and Police Service staff will review the new lighting plan to ensure it meets Santa Fe Springs Municipal Code Sections 155.415 and 155.432, which address issues of light or glare. Further, no new lighting is permitted without approvals from both Planning and Police Services department. Therefore, the project is not expected to have any significant effects relating to lighting and glare.

4.2 AGRICULTURAL RESOURCES

Would the project:

- 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?*

No Impact. The subject site and the surrounding areas are not used for agricultural purposes. The proposed project site is surrounded by land developed for industrial uses. Additionally, there are no areas within the City designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; therefore, project implementation will not result in the conversion of prime farmland or other similarly designated lands.

Moreover, no existing farmland is located near the subject site. No changes in the existing environment are proposed that would either directly or indirectly result in the conversion of farmland to non-agricultural uses. Therefore, no impacts to existing farmland resources will occur as a result of the proposed project.

- b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. The proposed project site is designated as Industrial in the City of Santa Fe Springs General Plan and is zoned M-2, Heavy Manufacturing. The M-2 zone district is not set aside for agricultural uses. Furthermore, there are no lands under the Williamson Act contract in the vicinity of the project site. Therefore, no conflicts with agricultural zoning and/or policies will occur.

See response 4.2.a.

- c) *Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

No Impact. As mentioned previously, the proposed project is surrounded by land developed for industrial uses. The proposed project does not involve any changes to the existing environment that could result in the conversion of Farmland to non-agricultural use. No impacts are anticipated in this regard.

4.3 AIR QUALITY

Would the project:

- a) *Conflict with or obstruct implementation of the applicable air quality plan?*

Less Than Significant Impact. The SCAQMD has the primary responsibility for ensuring that the South Coast Air Basin attains and maintains compliance with federal and state ambient air quality standards. The Basin includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The region is currently in non-attainment with the federal 8-hour ozone (O₃) standard, and the suspended particulate matter (PM₁₀), and particulate matter (PM_{2.5}) standards.

The SCAQMD is required by law to prepare a comprehensive basinwide Air Quality Management Plan (AQMP) which includes strategies (e.g., control measures) to reduce emission levels to achieve and maintain state and federal ambient air quality standards, and to ensure that new sources of emissions are planned and operated to be consistent with the SCAQMD's air quality goals. The AQMP's air pollution reduction strategies include control measures which target stationary, mobile, and indirect sources. These control measures are based on feasible methods of attaining ambient air quality standards. Pursuant to the provisions of both the state and federal Clean Air Acts, the SCAQMD is required to attain the state and federal ambient air quality standards for all criteria pollutants.

SCAQMD also prepared the 2007 AQMP, the 1997 Ozone State Implementation Plan (SIP), and the *1999 Amendment to the 1997 Ozone SIP Revision for the South Coast Air Basin*, which require additional short-term stationary source control measures.

Additionally, the SCAQMD developed an Air Toxics Control Plan (dated March 2000) that provides rules and policies to reduce air toxics and criteria emissions in the Basin. The plan discusses SCAQMD Rule 1401, which is a local program requiring new source review of toxic air contaminants (TACs). Permits for new, modified, or re-located equipments that emit TACs must meet limits for cancer and non-cancer impacts. Rule 1401 is updated periodically to reflect new information on air toxics that is developed by the State. Individual equipment must meet increased cancer risk of no more than one-in-one million or use Toxic Best Available Control Technology (T-BACT) to reduce their health risk below ten-in-one million increased cancer risk in order to obtain a permit. Equipment must also be below a hazard index of 1.0 for non-cancer impacts.

As proposed, the project would not significantly conflict with or obstruct the implementation of the AQMP, the 1997 Ozone SIP, or the 1999 Amendment. Installation of the new aboveground tanks and processing components may generate short-term emissions of O₃ precursors and carbon monoxide (CO) through the use of construction equipment burning fossil fuels. However, given the short installation/construction periods, emissions of O₃ precursors and CO are not expected to be significant. In addition, implementation of all SCAQMD O₃ and CO rules, and AQMP control measures, is expected to produce O₃ and CO emission reductions throughout the region overall.

The SCAQMD CEQA Air Quality Handbook uses these daily and quarterly emissions as criteria for significant impact from new projects:

Pollutant Parameter	Daily Emissions	Quarterly Emissions
Carbon Monoxide	550 pounds	23.75 tons
Oxides of Nitrogen	100 pounds	2.5 tons
Reactive Organic	75 pounds	2.5 tons
Particulate Matter	150 pounds	6.75 tons
Oxides of Sulfur	N/A	6.75 tons

Carbon monoxide, oxides of nitrogen, and to a lesser extent, reactive organic gases are emitted by vehicles and combustion equipment. The applicant has estimated that the project impact will be no more than 12 additional tanker trucks per day. Based on this estimated amount, the resulting pollutant emission rates are approximated at 2lb/day carbon monoxide, 7 lb/day oxides of nitrogen, less than 1 lb/day reactive organic gases, and 0.5 lb/day particulate matter. Each of these emission rates is well below levels considered significant on both a daily and quarterly basis.

However, the project will result in a potential increase in emissions from the additional storage and treatment tanks related to the new oily wastewater treatment process. Specifically, emission from working and breathing losses are expected from the four tanks designated to hold the wastewater that is received (O-1 through O-4, see Figure 3 – Site Plan) and from two tanks designated to hold oil that is separated from the water (O-9 and O-10, see Figure 3 – Site Plan). As a result, a Health Risk Assessment (HRA) of potential incremental cancer and non-cancer impacts was recently performed by ENSR Corporation.

Emissions were calculated using the USEPA model Tanks 4.0 with the following assumptions used for the calculations:

Assumptions Used for Tank Emissions Calculations:

Parameter	O-1 through O-4	O-9 and O-10
Mixture Composition	1.25% Gasoline 23.75% Diesel 75.00% Water	5% Gasoline 95% Diesel
Throughput	12,500gal.day per tank	
Control	95% Control from Activated Carbon Routed Stack >24ft	

Storage Tank Emission Estimates

Pollutant	Emission (lb/yr)		
	O-1 through O-4	O-9 and O-10	Total
<u>Gasoline</u>			
VOC	40.806	35.622	234.468
Methyl Tertiary-Butyl Ether	6.12	5.34	35.16
Toluene	8.16	7.12	46.88
Xylene, all isomers	7.35	6.41	42.22
N-Hexane	3.26	2.85	18.74
Benzene	2.04	1.78	11.72
Naphthalene	0.82	0.71	4.7
Styrene	0.41	0.36	2.36
<u>Diesel</u>			
VOC	0.906	0.792	5.208
Naphthalene	0.07	0.07	0.42
Paraffins	0.37	0.37	2.22

Following the SCAQMD Risk Assessment Procedures for Rule 1401 and 212, Version 7.0, a Tier 1 screening (Emission Levels analysis for multiple pollutants) was performed. Below are the Tier 1 screening results.

Tier 1 Screening Analysis Results

Tier 1 Screen	Project Value	Screening Limit	Exceed Limit?
ASI _{cancer and/or chronic}	1.5	1	Yes
ASI _{acute}	.00112	1	No

Since the ASI_{cancer and/or chronic} is greater than 1, a Tier 2 screening (Risk Assessment) needed to be performed. The Tier 2 screening evaluates the Maximum Individual Cancer Risk (MICR), Acute Hazard Index (HIA), and Chronic Hazard Index (HIC) for worker and residential exposure. It also evaluates the Cancer Burden (CB) generated by the project. The Tier 2 screening results are provided on the following page.

Tier 2 Screening Risk Assessment Results

Tier 2 Screen	Project Value	Screening Limit	Exceed Limit?
MICR Worker	1.69 E ⁻⁰⁶	1.00 E ⁻⁰⁵ w/ T-BACT	No
MICR Residential	1.19 E ⁻⁰⁷	1.00 E ⁻⁰⁵ w/ T-BACT	No
HIA Worker (highest)	6.24 E ⁻⁰⁴	1.0	No
HIA Residential (highest)	8.89 E ⁻⁰⁵	1.0	No
HIC Worker (highest)	3.15 E ⁻⁰¹	1.0	No
HIC Residential (highest)	5.33 E ⁻⁰²	1.0	No
CB	0.0003	0.5	No

Given that the project will apply T-BACT for the tanks, the proposed project would not significantly conflict with or obstruct the implementation of SCAQMD Rule 1401. As evident in the tables above, the project MICR does not exceed the ten in a million increased cancer risk with T-BACT (since carbon drums will be placed on the tank vents), the HIC does not exceed 1.0 for any organ, and the CB is less than 0.5. The project, therefore, is within the limits required by SCAQMD Rule 1401.

Recently there has been an increase in public attention to climate change and global warming issues, at the international, federal, state and even the local level. California's Assembly Bill 32 (AB 32), the *California Global Warming Solutions Act of 2006*, establishes statewide greenhouse gas (GHG) reduction targets, requiring California to reduce its GHG emissions to 1990 limits by 2020 (an approximate 25% reduction in emissions), and requires the California Air Resources Board (CARB) to establish GHG emission standards by 2012.

This attention has resulted in calls for CEQA documents to incorporate analysis and mitigation of climate change impacts from project contributions to GHG emissions. However, neither CEQA, the CEQA Guidelines, nor the State of California provide any guidance as to the appropriate significance thresholds or analytic methodology for the potential contribution to global climate change impacts that might be attributable to the GHG emissions of individual projects.

Furthermore, there are no state or federal regulations that set ambient air quality emission standards for greenhouse gases. The South Coast Air Quality Management District is scheduled to adopt a climate change policy and begin developing an interim GHG CEQA significance threshold, but it has not yet adopted a climate change plan.

A white paper titled *CEQA and Climate Change* released by the California Air Pollution Control Officers Association (CAPCOA) in January 2008 offers several

possible approaches to evaluating the significance of project related GHG emissions. The white paper does not endorse any particular approach and is intended as an informational resource, not a guidance document. However, the options discussed in the document can provide an outline for the potential evaluation of a project's significance with respect to GHG emissions.

The CAPCOA white paper discusses several broad options for approaching the determination of significance. Air districts could elect not to set any mass emission threshold for significance, requiring Lead Agencies to determine significance on a case-by-case basis. A second option would be to establish a threshold of significance of zero increase in GHG emissions. This would require that any project causing an increase in GHG emissions, no matter how small, would be required to prepare an EIR and mitigate the emissions.

The white paper also suggested several possible mass emission rates as possible thresholds for significance. The lowest of these suggested non-zero thresholds was 900 metric tons of GHG per year equivalent of carbon dioxide (tonnes/year CO₂ -e). This threshold represents the typical GHG emissions for a residential development containing 50 units, which would place it in the 90th percentile of such projects. Other possible non-zero thresholds identified in the CAPCOA white paper were greater than 900 tonnes/year.

The proposed project will not result in any direct emissions of GHGs. The project consists of tanks, pumps, mixers, etc. No fuel combustion or other activities generating GHGs will occur.

Indirect emissions of GHGs are associated with increased truck traffic, vehicle traffic from the five additional employees, and from additional electricity needed to for the new equipment. Increases in GHG emissions from trucks as a result of this project are expected to be minimal. The proposed project will be handling wastes that are currently being generated, and will continue to be generated whether or not the proposed project is approved. Therefore, the proposed project will result in shifts in existing truck routes, rather than generating new traffic. However, in order to provide a conservative estimate of GHG emissions associated with the proposed project, a worst-case estimate of truck traffic emissions was developed. For this estimate, an average trip length from a waste generating facility to PTI of 50 miles, or 100 miles round trip, was used. Therefore, up to 12 daily trucks would travel up to 1,200 miles per day occurring five days per week, 52 weeks per year or 260 days/year total.

Truck CO₂ exhaust emission factors were developed based on the latest version of the CARB Emission Factors model (EMFAC 2007). Emissions of the GHGs nitrous oxide (N₂O) and methane (CH₄) were estimated using CCAR emission factors and protocols. These were adjusted to a CO₂ equivalent basis by accounting

for the increased global warming potential of CH₄ (a factor of 21) and N₂O (a factor of 310). Emissions were calculated based on these emission factors and the total predicted travel distance. Vehicle miles for passenger cars were similarly estimated based on an increase of five workers with an average commute of 38.4 miles roundtrip from "State of the Commute Report 2006," South Coast Association of Governments, December 2006. Vehicle CO₂ exhaust emission factors were developed based on the latest version of the California Air Resources Board Emission Factors model (EMFAC 2007). Emissions of the GHGs N₂O and CH₄ were estimated using CCAR emission factors and protocols and converted to a CO₂ equivalent basis.

The proposed project will require the use of additional equipment powered by electrical motors, such as pumps and mixers and for lighting and control systems. Overall, this equipment is estimated to increase the facility's electrical demand by up to 20% over the current average of 1,555 Megawatt-hours per year (MWh/yr). The California Climate Action Registry (CCAR) has published a composite emission factor for GHGs from PTI's electrical utility, Southern California Edison, of 641.26 pounds of GHGs (CO₂ -e) per MWh (for 2006).

A conservative estimate of the total projected emissions of GHGs associated with the proposed project is shown below.

Source	GHG Emissions (Tonnes/year CO₂-e)
Fuel Combustion	0
Electrical Consumption (Based on 20% increase)	90
Mobile Sources (Employee cars, 5/day)	21
Mobile Sources (Heavy-Duty Trucks, 12/day)	604
Total	715

The total projected emission rate of 715 tonnes CO₂-e/year is well below the 900 tonnes/year threshold suggested by the CAPCOA white paper, which is the lowest non-zero threshold discussed. Therefore, the impact of GHG emissions from the proposed project is considered to be less than significant.

While the impact of GHG emissions associated with operations of the proposed project is considered to be less than significant, in keeping with good practices, the applicant has indicated it will seek further reductions in GHG emissions associated with the Facility. The applicant proposes to achieve this by limiting

idle times for delivery trucks and procuring energy efficient equipment and lighting to the extent practicable.

- b) *Violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

Less Than Significant Impact. As listed in Table 1 (SCAQMD Air Quality Significance Thresholds), the SCAQMD CEQA Handbook (1993) provides air quality significance thresholds for project construction and operation.

The proposed oily wastewater treatment process will require the addition of 10 aboveground storage and/or treatment tanks and three processing components to store and treat oily wastewater (which will be a new hazardous waste stream accepted by the facility). The facility will receive the wastewater stream into four tanks (O-1 through O-4). The oil is separated from the water and routed to two tanks designated to collect the oily waste (O-9 and O-10)). The treated water is separated routed to four designated tanks (O-5 through O-8). Emission from working and breathing losses are expected from the four tanks designated to hold the wastewater that is received (O-1 through O-4) and from two tanks designated to hold oil that is separated from the water (O-9 and O-10).

The proposed project may also generate pollutant emissions from stationary sources for on-site power generation and other mobile source emissions associated with vehicular traffic from employees as well as delivery of products.

Based on the anticipated increase of 12 tanker trucks a day to the subject site, the increase in vehicle traffic to the site would create a negligible increase in air emissions. See table below for anticipated emission levels associated with the delivery trucks.

Anticipated Delivery Truck Emissions (lb/mile)

Pollutant	Emission Estimates
Carbon Monoxide (CO)	0.03
Nitrogen Oxide (NO _x)	0.03
Reactive Organic Gases (ROG)	0.003
Particulate Matter (PM10)	0.001
Sulfur Oxide (SO _x)	0.0002

Short-term air quality impacts may also occur during the installation of the new tanks and processing components. The short-term air quality impacts, however, are considered to be less than significant since SCAQMD thresholds are not expected to be exceeded (see response 4.3.a).

Further, prior to commencement of the oily wastewater treatment operations, as a condition of approval the owner/operator will be required to provide data on emissions to demonstrate that no air quality violations will occur, including but not limited to, providing quantitative analysis of potential emission from operation using the methodologies in the AQMD 1993 CEQA Air Quality Handbook or other approved methodologies. Project's operational emission can also be calculated using California Air Resources Board (CARB) computer model URBEMIS 2002. If quantification of emissions reveals that the project's emissions exceed the established significance threshold, then mitigation measures shall be required to reduce any of the criteria pollutants.

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

Less Than Significant Impact. See response 4.3.a and b.

- d) *Expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impact. Project implementation is anticipated to increase the truck traffic onto the site. The oily water is expected to primarily be delivered by tanker trucks. The applicant has estimated that up to 12 tanker trucks deliveries per day will occur based on the proposed daily treatment of 50,000 gallons.

CARB has designated diesel particulates as a carcinogen. However, with the small number of additional truck traffic anticipated, the related air quality impacts on the nearby health care facilities, rehabilitation centers, residences, and other nearby sensitive receptors has been determined to be less than significant as described in Response 4.3.a.

Based on these results, the incremental truck traffic associated with the proposed project is considered to be less than significant.

- e) *Create objectionable odors affecting a substantial number of people?*

Less Than Significant Impact. Project implementation does have a potential to create undesirable fugitive odors from the treatment process. However, the Facility employs a two tiered waste acceptance approach. Generators intending to send waste to the Facility must first submit a Waste Profile Form to PTI for approval. This form is used by the generator to describe the chemical and physical characteristics of the waste, including odor. Secondly, when waste is received by the Facility, samples are collected from containers or bulk

deliveries to determine if the sample conforms to the accepted profile. If any particular wastes are found to have unacceptable odor, or the potential to generate odors during treatment, PTI will have the option to not accept such waste streams. Additionally, for odor control, PTI may also segregate such wastes into particular tanks which can be designed to have the vapor space vented through carbon canisters. Regardless, as mentioned previously, the new oily wastewater treatment operations would be required to comply with the Santa Fe Springs Code of Ordinances, § 155.418 through 155.420 regarding emissions of smoke, dust, fly ash, vapors, gases, fumes, other forms of air pollution and odors. Moreover, PTI will also need to obtain the required permits to install and operate all new processing equipment, in compliance with Rule 1401 of the South Coast Air Quality Management District. A condition will also be included in the CUP to outline the above-mentioned requirements. Therefore, the overall impacts from odors are anticipated to be less than significant.

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

Less Than Significant Impact. No naturally occurring asbestos is known to exist within the building and/or structures located on the subject site. Nevertheless, should asbestos be discovered, the Project will comply with SCAQMD Rule 1403 (Asbestos Emissions from Demolition/ Renovation Activities), requiring appropriate notification to SCAQMD and the application of measures to control potential releases of asbestos. Therefore, no impacts are anticipated in this regard.

4.4 BIOLOGICAL RESOURCES

Would the project:

- 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?*

No Impact. No protected wildlife species have been identified within or surrounding the subject site, but if wildlife does exist, it is believed to consist of common species found within urban areas. There is no evidence that the subject site is occupied by any known endangered, threatened, or rare plant or wildlife species or sensitive habitats. Furthermore, the City's General Plan does not identify any candidate, sensitive or special status species in the City.

The subject site is not located along or adjacent to a riparian corridor or habitat or other type of sensitive natural habitat.

The proposed project will have no impact 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.

There are no natural water sources, water courses, oceans, or associate wetland habitats as defined by Section 404 of the Clean Water Act within the subject site. Additionally, the runoff from the subject site does not flow to any naturally occurring wetlands thus would not affect wetland resources.

There is no evidence that area encompassed by the subject site is utilized for movement of any native wildlife species or migratory fish or wildlife species. The proposed use will not interfere with any kind of established native resident or migratory wildlife corridor or impede the use of a native wildlife or nursery site, since none exist within the subject site or in the near vicinity. Because no protected wildlife or biological species are known to exist within the subject site, the proposed use will not conflict with any local policies or ordinances protecting wildlife or biological species. The subject site is not under the jurisdiction of an adopted Habitat Conservation Plan, Natural Community Plan or other habitat conservation plan and no draft plan exists or is proposed; therefore, the proposed use will have no impacts in this regard.

- b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies,*

and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. See response 4.4.a.

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?

No Impact. See response 4.4.a.

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?

No Impact. See response 4.4.a.

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

No Impact. See response 4.4.a.

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

No Impact. See response 4.4.a.

4.5 CULTURAL RESOURCES

Would the project:

- a) *Cause a substantial adverse change in the significance of a historic resource as defined in § 15064.5?*

No Impact. An inorganic chemical manufacturing and recycling facility has operated on the subject property since the 1960's. There is no historical significance associated with subject site and/or its existing structures. Therefore, project implementation will not result in impacts to existing historical resources since none exists on the site.

No archaeological or paleontological resources are known to exist on the subject site. However, if future activities in the subject site encounters previously unidentified cultural resources, an archeologist must be afforded the opportunity to evaluate any additional finds and to complete an analysis in accordance with CEQA guidelines

There is no known ethnic or cultural value that is attributable to the subject site. No human remains are known to exist on the subject site.

- b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

No Impact. See response 4.5.a.

- c) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

No Impact. See response 4.5.a.

- d) *Disturb any human remains, including those interred outside of formal cemeteries?*

No Impact. See response 4.5.a.

4.6 GEOLOGY AND SOILS

Would the project:

- a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i) *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?*

Less Than Significant Impact. The subject site is not located within an Alquist-Priolo Earthquake Fault Zone as illustrated on the maps issued by the State Geologist for the area. However, in March of 1999, scientists confirmed the presence of an active, major “blind thrust” fault system directly under the Los Angeles area. The newly mapped fault is 40 kilometers long and runs from beneath downtown Los Angeles to the Coyote Hills in northern Orange County and towards Brea in the east, covering at least 840 kilometers. Three distinct segments exist within the fault, with one segment directly underlying Santa Fe Springs. However, no evidence has been presented with respects to the frequency in which the ruptures may occur, thus the potential for a fault rupture is considered to be less than significant.

- ii) *Strong seismic ground-shaking?*

Less Than Significant Impact. Like the rest of Southern California, the proposed subject site is located in a seismically active region susceptible to ground shaking with the occurrence of a seismic event. The nearest faults are the Whittier-Elsinore fault, which is located approximately two miles north of the City and the Norwalk Fault which is located approximately two miles south of the City. Other faults in the area are the San Andreas and San Jacinto faults and the Newport-Inglewood faults. These local and regional fault systems have a potential to impact the subject site when considering the maximum expected earthquake from each fault.

Therefore, to ensure that the effect of the possible ground shaking will be minimized to help protect human life, all new tanks, buildings and/or equipment for the oily water activities will be required to meet the applicable seismic parameters established by the current Los Angeles County Building Code (adopted/enforced by the City of Santa Fe Springs).

Further, if required by the California Geological Survey (also known as the California Division of Mines and Gas (CDMG), all future development, prior to

the issuance of any grading permits, shall be required to submit to the Building and Safety Division, a geotechnical report prepared by a California Certified Engineering Geologist and Registered Geotechnical Engineer during the plan check process to minimize future potential hazards. The report shall employ the standard criteria and methods enumerated in CDMG Special Publication 117. "Guidelines for Evaluating and Mitigating Seismic Hazards in California."

As a result, the impacts from potential ground shaking are expected to be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a process by which water saturated materials (including soil, sediment, and types of volcanic deposits) lose strength and may fail during strong ground shaking. Liquefaction is defined as "the transformation of a ground material from a solid state into a liquefied state as a consequence of increased pore-pressure."

The subject site has not been identified on the State of California Seismic Hazard Zones, Whittier Quadrangle official map (released March 25, 1999), as a site that is subject to liquefaction during a seismic event. Nevertheless, any future development on the subject site is required to comply with all applicable requirements of the Los Angeles County Building Code and mitigation measures as defined in Public Resource Code Section 2693(c). No impacts are anticipated in this regard.

iv) Landslides?

No Impact. The subject site is generally flat and devoid of significant topographical relief. No significant slopes, either natural or manmade exist on the subject site. Further, the subject site has not been identified on the State of California Seismic Hazard Zones, Whittier Quadrangle official map, (released March 25, 1999) as a site with the potential for landslides or mud flows; therefore, no impacts are anticipated in this regard.

b) Result in substantial soil erosion or the loss of topsoil?

No Impact. Aside from installation and removal of a few tanks within the already paved areas of the Facility, no new construction is anticipated; therefore, project implementation is not expected to create a substantial erosion or the loss of topsoil to the subject site. Nevertheless, any future development of the site will be required to conform with the City's standard erosion-control practices as well as all applicable local, state and federal

regulations to ensure that potential impacts are reduced to a less than significant level.

- 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?*

No Impact. As previously mentioned, the subject site is generally flat and devoid of significant topographical relief. No significant slopes, either natural or manmade exist on the subject site. Therefore, no impacts relating to onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse, are anticipated.

- d) *Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?*

No Impact. Soil within the subject site is not expansive, as defined in Table 18-1-B of the Uniform Building Code (1994). Therefore, no impacts are anticipated in this regard.

- e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

No Impact. The subject site is already served by an extensive system of infrastructure, including sewer connection. Soils within the subject site will not be required to support any septic tanks or alternative wastewater disposal system, the oily water treatment activities will be utilizing the existing system already in place; therefore, no impacts are anticipated in this regard.

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

No Impact. The project site is not known to be located in an area where naturally occurring asbestos is present, thus no impacts are anticipated in this regard.

4.7 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- a) *Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?*

Less Than Significant Impact. *The Facility accepts non-hazardous wastes as well as the following hazardous wastes for storage, treatment, and/or transfer:*

- RCRA oxidizing (D001 – Department of Transportation (DOT) Hazard Class 5.1 only), corrosive (D002), and some toxic (D004-D011) wastes
- Some RCRA listed F, K, and U wastes
- California wastes as listed in Table C-2 of the WAP

The Waste Analysis Plan (WAP) provided as Section C of the February 2006 Part B permit application as amended January 2008 provides details of the types of hazardous wastes currently or proposed to be accepted at the Facility. The WAP helps to facilitate safe and effective treatment of each waste managed by the subject use and also to minimize the potential for adverse chemical reactions resulting from mixing and handling potentially incompatible wastes. Specifically, the WAP provides procedures and controls that ensure that chemical and physical analysis is completed on a representative sample of each hazardous waste stream managed by the Facility.

An important part of the procedures and controls include waste stream characterization whereby waste streams received from off site are characterized by a waste profile form prior to receipt at the Facility. The generator completes (or provides sufficient information to allow the Facility to complete) a waste characterization (profile) form and submits it to the Facility. The profile form describes the waste stream and its pertinent physical and chemical characteristics, the process generating the hazardous waste, and also identifies all applicable state and federal hazardous waste codes. It is the generator's responsibility to provide accurate information. Incoming waste is also evaluated to verify that the contents of each hazardous waste shipment match the identity (e.g. proper shipping name, hazard class, and waste code) of the hazardous waste as specified on the manifest and determined under the pre-acceptance process described above. This is called the waste receipt analysis process.

Additionally, the owner/applicant will need to comply with all applicable Federal, State and local agencies plans and policies regarding handling of any discovered hazardous materials; therefore, impacts in this regard are anticipated to be less than significant.

- 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?*

Less Than Significant Impact. Because hazardous substance will be utilized in the oily water processing operations, there is a potential for the release of hazardous materials into the environment. However, the Facility retains an up-to-date Emergency Contingency Plan which describes the actions and procedures personnel working at PTL must follow in the event of a sudden or non-sudden release of hazardous waste. Objectives of the contingency plan are to minimize hazards to public health or the environment from any unplanned, sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil, or surface water. Additionally, the oily water treatment operation are strictly required to meet all Federal, State and local agencies plans and policies regarding handling of chemicals used in the process; therefore, the potential impacts relating to the proposed use are anticipated to be less than significant.

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

Less Than Significant Impact. The schools nearest to the subject site are Aeolian Elementary (approximately ½ mile north of the subject property) and Los Nietos Elementary (approximately ¾ mile northwest of the subject property). Therefore, the potential for hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste, within one-quarter mile of the existing school is considered to be less than significant.

- d) *Be located on a site that 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 the public or the environment?*

No Impact. The subject site is not located on a site included on the DTSC Hazardous Waste and Substance List (Cortese List) compiled pursuant to Government Code Section 65962.5. It is also not on USEPA's National Priorities List (NPL).

- e) *For a project located within an airport land-use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. The subject site is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, project implementation will not create a safety hazard for airport employees nor will it pose a safety hazard for the people living and working in the area.

f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. The subject site is also not within the vicinity of a private airstrip. Therefore, the project implementation will not result in a safety hazard in this regard for people residing nearby or for those employed at businesses nearby.

g) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact. The subject site is currently developed with an inorganic chemical manufacturing and recycling facility. Fire Department access throughout the site already exists. The existing site and use should be consistent with existing emergency response and evacuation. Project implementation is therefore not expected to impede implementation of, or physically interfere with, an adopted emergency plan or emergency evacuation plan.

Nevertheless, as a condition of approval, the owner/applicant will be required to provide a new site plan to the City's Fire Marshal to show that adequate Fire Department access will remain with the inclusion of the new oily wastewater operations.

Such roadways must be a minimum of 26 feet in width and any turns must provide a sufficient turning radius for fire vehicles. Such turning radius must be a minimum of 52 feet. Interior gates or fences will not be permitted across required fire access roadways. The following dimensions shall be used when planning for fire vehicle access: width of 11feet, length of 50 feet, height of 12 feet, and a turning radius of 52 feet.

h) *Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

No Impact. The subject site is located in an industrial area of the City that is not situated near any wildlands. There are no wildlands adjacent to the subject site nor are residences intermixed with wildlands in the vicinity of the subject site.

4.8 HYDROLOGY AND WATER QUALITY

Would the project:

- a) *Violate any water quality standards or waste discharge requirements?*

Less Than Significant Impact. The proposed oily wastewater treatment operation involves construction of a new 24 foot wide by 70 foot wide secondary containment pad and also the removal and installation of a few new tanks and required footings. Impacts related to water quality will be related mainly to urban runoff. Nevertheless, the applicant will be required to comply with the National Pollution Discharge Elimination System (NPDES) requirements which mandate the preparation of a Water Quality Management Plan (WQMP) that identifies Best Management Practices (BMPs) that will be implemented to control predictable pollutant runoff. Incorporation of these standard requirements will avoid water quality impacts. Project implementation will have a less than significant impact to water quality standards and waste discharge requirements.

- b) *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit 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 that would not support existing land uses or planned uses for which permits have been granted)?*

Less Than Significant Impact. Water service on the subject site is currently provided by the San Gabriel Valley Water Company. The groundwater in the area is recharged by "spreading" water into certain areas of the riverbed where the ends of the aquifers are near the surface. Dikes prevent it from running straight into the ocean. Rainwater and recycled water from the County Sanitation Department (605 & 60 Freeways) is also used for recharging.

The City has access to sufficient water to meet the demand of the subject site without any depletion of groundwater supplies or interference substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level reduction in the amount of water otherwise available for public water supplies. Project implementation will not significantly interfere with ground water recharge in the groundwater basin and will not affect the local groundwater table.

- 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 that would result in substantial erosion or siltation on or off site?*

Less Than Significant Impact. The subject site is currently developed with an inorganic chemical manufacturing and recycling facility. The applicant is proposing to add an oily wastewater operation to their existing activities. The proposed oily wastewater treatment operation involves construction of a new 24 foot wide by 70 foot wide secondary containment pad and also the removal and installation of a few new tanks and required footings.

Nevertheless, all projects must conform to Chapter 52 of the City Code, and implement the requirements of the approved Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP includes a requirement to implement post-construction Best Management Practices (BMPs) to mitigate (infiltrate and treat) the first three-quarters of an inch (3/4") of runoff from all storm events and to control peak flow discharges. All onsite storm systems and filters shall be maintained by the property owner.

Moreover, if drainage becomes an issue on the subject property as a result of the use, the owner/operator would be required to submit for approval, a 24" x 36" drawing to the City Engineer, showing the proposed plan and profile of onsite storm drain systems to minimize the impact that have occurred. Such drawing must be prepared by a Registered Civil Engineer. Upon completion, the owner/developer will also be required to submit a 24" x 36" record drawing, or "As-Built" for approval by the City Engineer. If necessary, the owner/developer will also be required to submit to the City Engineer any drainage covenants, private easement documents, or reciprocal drainage provisions for cross-lot drainage flows to be recorded in the Office of the County Recorder.

Therefore, because of the methods and programs mentioned above, project implementation should not result in substantial erosion or siltation on-or off-site, or will it cause a substantial increase to the rate or amount of surface runoff in a manner that would result in flooding on-or-off-site. Although the subject use may create or contribute runoff water, the runoff is not expected to exceed the capacity of the existing or planned stormwater drainage system. Also, the degradation in water quality will not result from project

- 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 that would result in flooding on or off site?*

Less Than Significant Impact. See response 4.8.c.

- e) *Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?*

Less Than Significant Impact. See response 4.8.c.

- f) *Otherwise substantially degrade water quality?*

Less Than Significant Impact. See response 4.8.a

- g) *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

No Impact. The project site is not located within the 100-year flood hazard zone as designated on the current Flood Insurance Rate map published by the Federal Emergency Management Agency (FEMA). The subject site is located within Flood Zone "C", which is designated as an area of minimal flooding. Because no housing developments are proposed on the subject site, implementation of the proposed oily wastewater treatment operations will not place housing within or increase exposure of people to flood hazards. Further, no impedance or redirection of flood flows will occur with respects to structures being placed within a 100-year flood hazard area.

- h) *Place within a 100-year flood hazard area structures that would impede or redirect flood flows?*

No Impact. See Response 4.8.g

- i) *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?*

Less Than Significant Impact. The Whittier Narrows Dam is located 5 miles northwest of the City of Santa Fe Springs' northern boundary. It is 7.5 miles down stream of the San Gabriel River flood control channel and the San Gabriel River Freeway (I 605). The Whittier Narrows dam is earth filled and was built in 1956. It has a capacity of 66,180 acre-feet and is operated by the U.S. Army Corp of Engineers. In the unlikely event of dam failure, the water flow direction would be southerly towards the cities of Pico Rivera, Whittier, Santa Fe Springs, Downey and Norwalk. The area of inundation would be bounded by Norwalk Boulevard on the east and the Los Angeles River on the west. A water depth level of

approximately 5 feet is predicted for the northern most part of Santa Fe Springs with the arrival time of one hour, gradually declining in depth to four feet at the southern end of the City's impacted area. The inundation zone would impact virtually the entire residential area of the City, but is not expected to significantly impact the subject site. This would require the evacuation of numerous residents and businesses within the projected dam inundation area. However, the probability of dam failure is very low. Therefore, project implementation will not significantly 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.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is the free oscillation of water in a closed or semi-closed basin; it is frequently observed in harbors, bays, lakes, dams and in almost any distinct basin. Except for inundation from dam failure (low probability) of the Whittier Narrows dam, the subject site is not anticipated to experience any impacts associated from inundation from seiches, tsunamis or mudflows. A tsunami, commonly referred to as a tidal wave, is a sea wave generated by submarine earthquakes, major landslides or volcanic action. The City of Santa Fe Springs is located well inland, away from the Los Angeles County coastline. Due to the elevation and the distance from the coastline, tsunami hazards are improbable for the subject site and vicinity. Additionally, the subject site is essentially flat and devoid of steep slopes that could be undermined by seismic activity or other instability to cause mudflows. Project implementation will not result in exposure of people or structures to seiches, tsunamis or mudflows. No impacts will occur in this regard.

4.9 LAND USE AND PLANNING

Would the project:

a) *Physically divide an established community?*

No Impact. The subject site is currently developed with an inorganic chemical manufacturing and processing facility. The applicant is proposing to add an oily wastewater operation to the existing use. The proposed project involves removal and installation of some tanks from 7,000 gallons to 20,000 gallons in capacity. No new construction is anticipated. Therefore, project implementation will not divide an established community or disrupt patterns of community life. The proposed project is for an industrial use within an industrial area of the city.

In addition, the applicant is required to obtain approval for the requested Conditional Use Permit (CUP), as well as any other required, local, state, or federal permits before the owner may begin operations of the oily wastewater operation on the subject site. In processing the CUP entitlement, staff will be reviewing the project to ensure that it will not 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, local coastal program, or zoning ordinance).

b) *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?*

No Impact. See Response 4.9.a.

c) *Conflict with any applicable habitat conservation plan or natural community conservation plan?*

No Impact. Project implementation will not conflict with a habitat conservation plan, natural community conservation plan or other adopted resource plan. Neither of these kinds of plans has been imposed on the subject site nor on neighboring properties. Further, the use will not conflict with policies identified in the General Plan.

4.10 MINERAL RESOURCES

Would the project:

- 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?*

No Impact. The subject site does not feature any known mineral resources. Furthermore, designate mineral resource areas within the boundaries of the City are not identified in the City's General Plan or any other kind of land use plan. No impacts are anticipated in this regard.

- 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?*

No Impact. See Response to 4.10.a

4.11 NOISE

Would the project result in:

- 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?

Less than Significant Impact. The proposed oily wastewater operations will occur within the existing 4.8 acre site. PTI currently uses the property for the operation of an inorganic chemical manufacturing and recycling facility. Since both uses generate similar noise, the anticipated noise impact is expected to be a less than significant if at all.

Nevertheless, if noise sources relating to the either the existing inorganic chemical manufacturing and recycling facility or the proposed oily water operations exceeds standards established in the City's General Plan and City's Noise Ordinance, the owner/operator shall be required to perform a noise analysis to identify and reduce the noise impacts to ensure they do not exceed accepted thresholds. If determined, the analysis will (at minimum):

- Identify existing noise levels generated onsite and future noise levels forecasted to be generated by project activities and any additional trips associated with the proposed project
- Discuss short-and long-term noise impacts based on compliance with the noise levels permitted in the City's Noise Ordinance and General Plan
- Discuss the effects on surrounding sensitive noise receptors, specifically the residential areas to the east and the high school to the northeast
- Recommend mitigation measures necessary to reduce all identified noise impacts

- b) *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

No Impact. Although the proposed oily wastewater treatment operations do involve equipment or processes that generate groundborne vibration or groundborne noise levels, the noise level is not anticipated to increase. Similar activities already occur on the subject site.

- c) *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less Than Significant Impact. See Response to 4.11.a

- d) *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less Than Significant Impact. See Response to 4.11.a

- e) *For a project located within an airport land-use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The subject site is not located in the vicinity of an airport land use plan or within two miles of a public airport or public use airport. The subject site is also not located within the vicinity of a private airstrip. No impact is anticipated in this regard.

- f) *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. See Response to 4.11.e

4.12 POPULATION AND HOUSING

Would the project:

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

No Impact. PTI currently uses the site for the operation of an inorganic chemical manufacturing and recycling facility. They are now proposing to add oily wastewater operations to the existing activities. The proposed oily wastewater treatment operation involves construction of a new 24 foot wide by 70 foot wide secondary containment pad and also the removal and installation of a few new tanks and required footings

The applicant has no current or future plans to construct new dwelling units on the subject property. Nevertheless, both the General Plan and Zoning designation for the subject site would not allow for housing to be developed on or within the subject site. Further, no dwelling units currently exist on the subject site; consequently, no displacement of housing or people will occur.

The project implementation is not expected to induce substantial growth in population and housing projections beyond that identified in the City's Housing Element. The Housing Element contains programs and policies that address the City's future housing needs.

- b) *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

No Impact. See Response 4.12.a

- c) *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

No Impact. See response 4.12.a

4.13 PUBLIC SERVICES

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental 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:*

1) *Fire Protection?*

Less than Significant Impact. Fire protection and paramedic delivery services for the City of Santa Fe Springs community are provided primarily by the City's Fire Department. The Insurance Services Office (ISO) rating system is a measure of the City's overall fire protection preparedness. The rating system assigns designations of Class 1, which represents the highest level of preparedness, to a Class 10, the lowest level. The rating is based on four primary areas of fire defense, which are: 1) city water supply (fire flow, distribution, hydrants, and reliability); 2) communications (dispatching, radio frequencies, and phone lines); 3) fire department (facilities, equipment, personnel, and training); and 4) city measures (codes, controls, enforcement, and mutual aid agreements). Of these four criteria, the water system is given the heaviest weight. The City of Santa Fe Springs became an ISO Class 2 rated City in 1984.

2) *Police Protection?*

Less than Significant Impact. Crime protection services for the City of Santa Fe Springs are managed and provided primarily by the City's Department of Police /Community Relations and its contract with the Whittier Police Department. City staff Public Safety Officers also provide civilian crime protection services through the management and handling of calls for service, crime report writing, crime scene investigation, municipal code enforcement and security for municipal facilities and events. The City and Whittier Police Department consider the level of police protection and response times provided by the Department to be adequate. The proposed oily wastewater operations will not adversely impact the existing level of police protection services nor is it anticipated that emergency response times would be adversely impacted.

3) *Schools?*

Less than Significant Impact. The proposed oily wastewater operations will not have any impact on school enrollment. Although students may attend schools in city where their parents work, majority of families send their kids to local schools near where they reside. The new operation is

not expected to generate a significant amount of new employees. Therefore, impact is anticipated to be less than significant in this regard.

4) *Parks?*

Less than Significant Impact. The City currently operates six community parks, seven parkettes, one historical park and one historical estate. The City also operates the Aquatic Center which has two outdoor swimming pools; the Activity Center which includes a gym with basketball, handball, gymnastics, weight lifting and boxing facilities; and the Community Gardens where City residents can rent a parcel of land and grow vegetables and flowers. The City of Santa Fe Springs has made the formation and preservation of parks and open space a priority and because of this commitment is referred to by many people as the "City of Parks." The National Recreation and Parks Association (NRPA) suggests that a park system within a municipality be composed of a central core of parkland that totals 6.5-10.5 acres of developed open space per 1,000 residents. Another commonly accepted minimum standard for planning for local recreational facilities in urbanized areas is four acres per one thousand people, which was created by the Southern California Association of Governments (SCAG) and adopted by Los Angeles and Orange counties. SCAG also uses the figure of 2.5 acres of recreational land per 1,000 persons for purposes of determining priorities for needed projects. At present there are approximately 149 acres of schools, parks, and recreation facilities developed within the City limits. With a total residential population of 17,500, the City's ratio is 8.51 acres per 1,000 residents. Therefore, impact is anticipated to be less than significant in this regard.

5) *Other Public Facilities?*

No Impact. See Response 4.13.a.1 & a.4

4.14 RECREATION

Would the project:

- 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.*

No Impact. The proposed oily wastewater operations will not result in an increase in 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.

As mentioned previously in response 13a-4, the City of Santa Fe Springs presently operates six community parks, seven parkettes, one historical park and one historical estate. The City also operates the Aquatic Center which has two outdoor swimming pools; the Activity Center which includes a gym with basketball, handball, gymnastics, weight lifting and boxing facilities; and the Community Gardens where City residents can rent a parcel of land and grow vegetables and flowers.

In addition, the Recreation Division of the City's Department of Community Services conducts special events throughout the year, including educational classes, softball and basketball leagues, Music Festival Concerts, and the After School Sports programs using these and other facilities located within the City. Although, employees of the oily wastewater operations may use parks and other public facilities, the anticipate number of new employees will have very little, if any impact on the existing facilities mentioned above.

- b) *Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?*

No Impact. See Response 4.14.a.

4.15 TRANSPORTATION/TRAFFIC

Would the project:

- a) *Cause an increase in traffic that 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)?*

Less Than Significant Impact. The applicant is proposing to add oily wastewater operations to its existing inorganic chemical manufacturing and processing facility. The project is expected to result in an increase in traffic since the oily wastewater operations will be in addition to the existing activities on-site. The applicant is estimating the project impact to be no more than 12 tanker trucks per day. In addition, an estimated five additional vehicle commute trips are expected based on the additional five workers for the proposed project. However, the workers will be spread over several shifts and no more than two vehicle commute trips are expected within an hour. Similarly, no more than two of the up to twelve trucks are expected to arrive or depart within an hour, for a total of no more than four additional vehicle trips per hour. These impacts are much less than the impacts of the tanker truck trips and car trips associated with the facility's current operations and the current existing traffic conditions based on 2004 Traffic Flow Map provided by the Principal Civil Engineer of the City of Santa Fe Springs. The maximum total of 34 additional vehicle trips per day (12 trucks and five cars both arriving and departing) compare with 33,703 vehicles per day traveling on the primary route of Slauson Avenue near Dice Road. The alternate route of Los Nietos Road near Dice Road handles 12,774 vehicles per day.

Roads are characterized by the Level of Service (LOS) with LOS A being the best and representing free flowing traffic and LOS F is the worst where traffic exceeds capacity. The LOS designations of the intersections at Dice Road and Slauson Avenue (signalized) and Dice Road and Los Nietos Road (unsignalized) have not been determined. According to the Principal Civil Engineer of the City of Santa Fe Springs, Rafael Casillas, the traffic volumes have not warranted such a determination. Mr. Casillas' opinion is that these intersections would have a LOS no worse than "B." A LOS of B "represents stable operation. An occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted with platoons of vehicles." LOS B also has a volume to capacity ratio greater than 0.6 and up to 0.7.

A significance threshold for traffic is discussed in "Traffic Impact Analysis Report Guidelines" by the Los Angeles County Department of Public Works dated January 1, 1997. The capacity for a one lane intersection is stated to be 1,600

vehicles per hour. The incremental increase in traffic associated with the project of up to four vehicles per hour is a 0.25 percent increase. The significance threshold for a LOS C (LOS A and B are not specified) rated intersection is a 4 percent increase or more. The incremental increase in project traffic of up to four vehicles per hour or 0.25 percent increase is far below the significance threshold.

As explained above, the impact from the increase in traffic resulting from the proposed new oily wastewater operations at the facility will be less than significant. Nearby roadways and intersections can accommodate the additional traffic (up to 12 tanker trucks and five cars per day with an expected maximum of four additional vehicles per hour) without impacting existing traffic levels or resulting in substantial degradation of existing levels of service at nearby intersections at Dice Road and Slauson Avenue (signalized) and Dice Road and Los Nietos Road (unsignalized).

b) *Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?*

Less Than Significant Impact. See Response 4.15.a

c) *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

No Impact. The proposed oily wastewater operations on the subject site will not affect existing air traffic patterns. There are no airports located in close proximity to the site.

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

No Impact. Hazards due to a design feature are not expected to occur. A main access point for trucks, passenger vehicles and light duty trucks is provided along Dice Road. Additionally, the access driveway is approximately 350 feet in length thus there is more than adequate queuing so that vehicles accessing the site do not interfere with on-street circulation. Furthermore, existing access provided throughout site allow for effective circulation and maneuvering for large vehicles. The proposed project does not involve any changes to the existing circulation pattern.

e) *Result in inadequate emergency access?*

No Impact. Fire Department access roadways are required throughout the subject site. Such roadways must be a minimum of 26 feet in width and any turns must provide a sufficient turning radius for fire vehicles. Such turning radius must be a minimum of 52 feet. Interior gates or fences are not permitted across required fire access roadways.

Currently, the site already provides this Fire Department access. The proposed project does not involve any changes to the existing circulation pattern, thus no impacts are expected in this regard.

f) *Result in inadequate parking capacity?*

Less Than Significant Impact. In accordance with the adopted Zoning Ordinance, parking requirements depend on the proposed use and building type. Adequate off-street parking and loading areas shall be provided in accordance with the adopted Zoning Ordinance. City planning staff will review and approve the proposed parking plan prior to commencement of activities, to ensure they meet the zoning ordinance requirements.

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

Less Than Significant Impact. The proposed project will not conflict with applicable policies, plans, or programs supporting alternative transportation.

4.16 UTILITIES/SERVICE SYSTEMS

Would the project:

- a) *Exceed wastewater treatment requirements of the applicable RWQCB?*

Less Than Significant Impact. The subject property is located within the jurisdictional boundaries of District No. 18 of the Los Angeles County Sanitation Districts of Los Angeles County. For the Districts' to conform with the requirements of the Federal Clean Air (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into the Air Quality Management Plan, which is prepared by the South Coast Air Quality Management District in order to improve air quality in the South Coast Air Basin as mandated by the CAA.

All expansions of District facilities must be sized and service phased in a manner which will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial. The available capacity of the District treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. Service will be limited to levels associated with the approved growth identified by SCAG.

PTI is proposing to install a new treatment system to treat, store and transfer oily wastewater. The proposed oily water process will handle up to 50,000 gallons per day. However, the maximum permitted treatment limit of 137,200 gallons per day for the Facility will not change; therefore, the impacts are considered to be less than significant.

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

No Impact. See Response 4.16.a.

- c) *Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?*

No Impact. Although the proposed project involves installation of a new treatment system, the maximum permitted treatment limit of 137,200 gallons per day for the Facility will not change. As is, the existing storm drains at the

perimeter of the site are adequate to serve both the existing and proposed uses on the subject site.

As previously noted, the site is located within the jurisdictional boundaries of District No. 18 of the Los Angeles County Sanitation Districts of Los Angeles County. The district is committed to providing service to the project. Service will be to levels associated with the approved growth identified by SCAG. In addition, the oily water treatment operations is subject to USEPA pretreatment standards for Centralized Waste Treat Category (40 CFR 437). Impacts are considered to be less than significant in this regard.

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

No Impact. See Response 4.16.c

e) *Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

No Impact. See Response 4.16.c

f) *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

No Impact: Solid waste generated by the proposed use as well as several cities within the Los Angeles County is disposed of in a number of landfills, both County and privately owned. Sixteen facilities were identified as accepting solid waste from the City. The closest landfill (operated by the County Sanitation Districts) that could be used by the proposed project is the 1,365-acre Puente Hill Landfill. The Puente Hills Landfill is located immediately southeast of the intersection of the San Gabriel Valley (I-605) Freeway and the Pomona (SR-60) Freeway, in unincorporated Los Angeles County. The landfill operates under a local land use permit that is valid through October 31, 2013. The permit allows the landfill to accept a maximum of 13,200 tons of refuse per day. It is general knowledge that a shortfall in permitted daily landfill capacity may be experienced in the County of Los Angeles within the first decade of the 21st century.

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. The Act required city and county jurisdictions to identify an implementation schedule to divert 25% of their total solid waste

stream from landfill disposal by the year 1995, and 50% of the total waste stream from landfill disposal by the year 2000. In 2000, the City surpassed the mandated diversion goal. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation.

The City of Santa Fe Springs has prepared a Source Reduction and Recycling Element (SRRE) that identified all programs the City plans to implement to meet the mandated diversion goals. Although no new construction is anticipated from the proposed use, future developments on the subject site shall comply with Ordinance No. 914 which requires contractors to recycle materials generated on the site. The required goal is to reuse or recycle 75% of the project waste. Contractors must submit a Waste Management Plan indicating the types of materials that will be recycled and the permitted Recycling Dealer. Construction and Demolition permits are not issued until the Waste Management Plan is submitted and approved. Contractor has to submit receipts or a report from the waste hauler and recycling dealer to show that 75% of the waste on site was recycled.

Further, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, require each development project to provide storage area for collection and removal of recyclable materials. All future development shall provide adequate storage areas for collection/storage of recyclable and green waste materials.

No impacts are anticipated in this regard.

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

No Impact: See Response 4.16.g.

4.17 FINDING OF DE MINIMIS IMPACT TO FISH, WIDLIFE, AND HABITAT

The following provides substantial evidence as to why the project will have no potential adverse effect on the listed resources as defined by section 711.2 of the Fish and Game Code:

- a) *Riparian land, rivers, streams, watercourses, and wetlands under state and federal jurisdiction.*
- b) *Native and non-native plant life and the soil required to sustain habitat to fish and wildlife.*
- c) *Rare and unique plant life and ecological communities dependent on plant life.*
- d) *Listed threatened and endangered plant and animals and the habitat in which they are believed to reside.*
- e) *All species of plant or animals listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulation adopted there under.*
- f) *All marine and terrestrial species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside.*
- g) *All air and water resources the degradation of which will individually or cumulatively result in a loss of biological diversity among plants and animals residing in that air and water.*

No Potential for Adverse Impact. The project site is located in a developed area. No federal or state special status plant or animal species, or their habitats, exist at the site. Riparian land, rivers, streams, water courses, or wetlands are not present at, or adjacent to, the site. Although the site is unpaved, it is mostly devoid of plant life. The proposed oily wastewater treatment operation is similar to the existing inorganic chemical manufacturing and processing activities that already occur on the site. Therefore, the proposed project is not expected to adversely affect plant or animals listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulations adopted thereunder.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

Does the project:

a) 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?

No Impact. The owner/operator is proposing to add an oily wastewater operation to their existing inorganic chemical manufacturing and processing facility. Aside from the removal and installation of a few tanks, the project involves no new construction. Although the proposed project does have the potential to degrade the quality of the environment, none of the impacts is potentially significant nor will the impacts exceed maximum thresholds.

Further, project implementation is not anticipated to 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) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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.)

No Impact. The proposed project does not have impacts that are individually limited, but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of current projects, and the effects of probably future projects.)

c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact. Through the course of preparing this Initial Study, it was discovered that the proposed project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

5.0 REFERENCES

California Department of Conservation – Division of Mines and Geology (CDMG). 1999. *State of California Seismic Hazard Zones, Whittier Quadrangle Official Map*. 25 March 1999.

CDMG. 1998. Maps of Known Active Fault, Near-Source Zones in California and Adjacent portions of Nevada.

City of Santa Fe Springs. 2005. *Initial Study of the Santa Fe Springs Townlots Housing Project*. 19 January 2005.

South Coast Air Quality Management District (SCAQMD). 1999. *1999 Amendment to the 1997 Ozone SIP Revision for the South Coast Air Basin*. Adopted 10 December 1999.

SCAQMD. 2000. *Air Toxics Control Plan*. March 2000.

SCAQMD. 1993. *CEQA Handbook*.

SCAQMD. 2006. *Draft 2007 Air Quality Management Plan*, accessed at <http://www.aqmd.gov/aqmp/07aqmp/07AQMP.html> on 12 October 2006.

6.0 DRAFT REPORT PREPARATION AND REVIEW PERSONNEL

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Cuong Nguyen, Associate Planner & Project Manager
Wayne Morrell, Principal Planner
Richard Kallman, Environmental Protection Specialist

7.0 LEAD AGENCY DETERMINATION

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, 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.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that 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.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Agency

Printed Name/Title

Date

FIGURES

TABLES

Table 1 SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds ^a		
Pollutant	Construction ^b	Operation ^c
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
Sox	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk \geq 10 in 1 million Hazard Index \geq 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants ^d		
NO ₂	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	0.25 ppm (state)	
annual average	0.053 ppm (federal)	
PM ₁₀	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^e & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
24-hour average	1.0 $\mu\text{g}/\text{m}^3$	
annual geometric average	20 $\mu\text{g}/\text{m}^3$	
annual arithmetic mean		
PM _{2.5}	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^e & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
24-hour average		
Sulfate		
24-hour average	25 $\mu\text{g}/\text{m}^3$	
CO	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	20 ppm (state)	
8-hour average	9.0 ppm (state/federal)	

^a Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

^b Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

^c For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

^d Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

^e Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day
ppm = parts per million
 $\mu\text{g}/\text{m}^3$ = microgram per cubic meter
 \geq greater than or equal to

(Rev. April 2007)

Table 2 Permitted Noise Levels in the City of Santa Fe Springs

A-Weighted Sound Level in Decibels (dB(A))										
	Daytime (7:00 a.m. to 10:00 p.m.)					Nighttime (10:00 p.m. to 7:00 a.m.)				
	Maximum Cumulative Minutes Duration in Any 1- Hour Period				Absolute Maximum	Maximum Cumulative Minutes Duration in Any 1-Hour Period				Absolute Maximum
Receiving Area	30	15	5	1		30	15	5	1	
Outdoor Noise Level at Lot Line Of:										
Any school, church, or hospital	45	50	55	60	65	45	50	55	60	65
Any other use										
In the A-1, R-1, or R-3 Zone	50	55	60	65	70	45	50	55	60	65
In the C-1 or C-4 Zone	60	65	70	75	80	55	60	65	70	75
In the ML, PF, or BP Zone	60	65	70	75	80	60	65	70	75	80
In the M-1 or M-2 Zone	70	75	80	85	90	70	75	80	85	90
Residential Building Interior										
In the A-1 or R-1 Zone	45	50	55	60	65	45	50	55	60	65
In the R-3 Zone	45	50	55	60	65	45	50	55	60	65
Sound Levels at or above each decibel level given in the table shall not occur for a duration longer than that given in the corresponding column heading.										

	The project site is located in the c-4 PD Zone; therefore, the noise levels permitted for the proposed project would be consistent with other commercial type uses.
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(64 Code, § 52.34) (Am. Ord. 712, passed 6-11-87) Penalty, see § 10.97

APPENDIX