

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

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

PROJECT TITLE: Veolia ES Technical Solutions L.L.C. – Hazardous Waste Facility Permit		CALSTARS CODING: PCA: 25040 Site: 200161
PROJECT ADDRESS: 1125 Hensley Street	CITY: Richmond	COUNTY: Contra Costa
PROJECT SPONSOR: Veolia ES Technical Solutions, LLC	CONTACT: Javed Hussain Veolia ES Technical Solutions, LLC 107 S. Motor Avenue Azusa, California 91702	PHONE: (626) 945-6003

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

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

STATUTORY AUTHORITY:

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

DTSC PROGRAM/ ADDRESS: Department of Toxic Substances Control Office of Permitting 8800 Cal Center Drive Sacramento, California 95826	CONTACT: Sam Coe 8800 Cal Center Drive Sacramento, California 95826	PHONE: (916) 255-3587
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PROJECT DESCRIPTION:

The project is the issuance of a Hazardous Waste Facility Permit (Permit) for the Veolia ES Technical Solutions L.L.C. (Veolia) Richmond Facility (Facility) by the Department of Toxic Substances Control (DTSC), as authorized by the California Health and Safety Code, Chapter 6.5, and the Resources, Conservation and Recovery Act (RCRA). Veolia currently operates under a Permit issued on January 24, 1994 that will expire when DTSC makes a determination on the permit renewal application. A permit renewal would authorize the continued storage and transfer of off-site generated hazardous waste.

The Veolia Facility is a commercial storage and transfer facility, located in the city of Richmond, California. See Location Map, Figure 1. The operations conducted at the facility include:

- Receiving and shipping out packaged and manifested RCRA and non-RCRA hazardous wastes, universal wastes, and petroleum-impacted materials
- Storage of the packaged wastes for less than 1 year (the typical residence time is 10 days or less)
- Consolidation of petroleum hydrocarbon-contaminated soils into bins from drums and smaller containers. The activities at the facility that require a permit are the storage of hazardous waste in designated storage areas in containers such as drums and roll-off bins.

The facility picks up or receives shipments of hazardous and non-hazardous waste from off-site sources. Waste is generated by commercial, industrial, and household sources located throughout Northern California, including companies engaged in research and development, pharmaceutical and general manufacturing, educational institutions, hospitals, government agencies and homeowners. Wastes are off loaded into the permitted storage areas or loaded directly onto transfer vehicles for shipment. The associated paperwork (manifests, packing

slips), piece count, and container integrity is reviewed and inspected. Hazardous waste consolidation takes place, involving household hazardous waste, materials with economic value destined for recycling, non-RCRA solids, and petroleum hydrocarbon-contaminated soil and debris.

The hazardous wastes stored at the Veolia Facility will generally fall into two broad categories: (1) packaged laboratory chemical (lab pack), and (2) containerized gases, liquids or solids. Lab packs consist of containers of waste chemicals, compounds, and samples packaged in US DOT-acceptable drums or boxes, with absorbent material in the outside container to reduce the chance of damage and to absorb any liquid in the event of breakage of the inner containers. The majority of materials handled by Veolia are packaged laboratory chemicals.

UNITS:**Storage Area 1**

Located on the western boundary of the property, has 1,839 square feet of storage space in three (3) separate bays, housing acids, pesticides, and caustics in containers. See Facility Site Plan, Figure 2.

Storage Area 2

Located in the northeastern portion of the facility, has 1078 square feet of storage space in two (2) separate bays, housing flammables and oxidizers in containers.

Both Storage Areas 1 and 2 are fully covered by a roof, with the front portion of the buildings equipped with sliding plastic partitions. The bays are separated by concrete berms. A curb-type berm along the sides and the back wall of the storage areas provide the secondary containment required. The secondary containment capacity is designed to handle a minimum of 10 percent of the maximum volume of the containers stored in the bays. Containers would be stored on top of pallets. Some containers may be stacked two-high.

Storage Area 3

A third storage area, located in the eastern portion of the property, comprises approximately 972 square feet of the warehouse for storage in two (2) roll-off containers containing non-RCRA solids, or petroleum hydrocarbon-contaminated soil and debris.

STORAGE CAPACITY:

The renewal of the Permit would authorize the facility to store hazardous waste in up to the equivalent of 441, 55-gallon drums, and two (2) roll-off containers. This allowable storage is the maximum volume of hazardous waste stored in containers that is allowed, and does not represent the total capacity of the storage areas or the daily average amounts. Historically, daily average amounts range from approximately 25% to 70% of the total permitted storage. Thus, under the proposed project, Veolia will be permitted to store up to 24,255 gallons of hazardous waste in containers at any one time, and an additional 60 cubic yards of hazardous waste in roll-off bins at any one time.

NEW CONSTRUCTION:

There is no new construction associated with this project.

ENVIRONMENTAL IMPACT ANALYSIS

1. Aesthetics

Project Activities Likely to Create an Impact: None,

Description of Baseline Environmental Conditions: The site is zoned "M2" for light industrial use. The facility is located in a business/light industrial paved and developed portion of Richmond. The structures and equipment at the proposed project site do not exceed the heights of the neighboring buildings and are visually similar to neighboring structures. The facility has had a Permit to store and transfer hazardous waste at this site since 1983.

Surrounding hills and the San Francisco and San Pablo bays are prominent scenic areas in Richmond. The city is bounded by the Berkeley Hills, San Pablo Ridge, Sobrante Ridge and Point Richmond. There are shoreline vistas on San Pablo Peninsula north of the San Rafael Bridge. Other scenic vistas in proximity to the site include Mount Tamalpais, San Francisco shoreline, South Shoreline Area, West Shoreline Area, Potrero-San Pablo Hills, North Shoreline Area, East Bay Hills, Albany Hill, and Brooks Island. There are no designated or eligible scenic highways near the facility.

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

Analysis as to whether or not project activities would:

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

Impact Analysis: The site is located in proximity to the Richmond Parkway. In this section of the Richmond Parkway the view is dominated by buildings. Views include open lands, sporadic industry, and the residential areas of North Richmond. Occasional long range views will occur. There are no elevated public viewpoints in the area that would be disrupted by the project. The scenic vistas in the area are not clearly visible from the site. The project would not have an adverse effect on a scenic vista.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility is located in a light industrial area. The facility is immediately surrounded by other industrial properties and a railroad line. The facility has operated at this site since 1983. There are no designated or eligible scenic highways near the facility. There is no new construction associated with the project that would damage scenic resources.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility is located in a light industrial area immediately surrounded by other industrial properties and a railroad line. The facility has operated at this site since 1983. There is no new construction associated with the project that would generate an aesthetically offensive site. This project would not degrade the existing visual character or quality of the site and its surroundings.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact

No Impact

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

Impact Analysis: There is no new construction associated with this project. The existing facility and surrounding properties are lighted for safety in parking lots and similar areas. There are no residential areas adjacent to the project site, therefore light and glare impacts are not expected should nighttime activities be necessary. The facility does not generate any glare during the day. In addition, there are no changes proposed for existing outdoor lighting, new windows, or shiny building materials that could reflect light at the facility. The project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 7.0 Conservation, Natural Resources, and Open Space Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8812>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.15 Visual Resources, February 11, 2011:

California Scenic Highway Mapping System: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, January 1992

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, Response to Comments, September 1992

2. Agricultural Resources

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit in an area zoned for this use.

Description of Baseline Environmental Conditions: The facility site is zoned for business/light industry. The city of Richmond is highly developed for urban and industrial uses. In the city of Richmond agriculture consists primarily of commercial facilities with plants growing in aboveground planters and community gardens/urban farms. Some grazing may occur in the hilly eastern portion of the city. Agriculture in Richmond is an interim land use. This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: There are no farmlands in the immediate vicinity of the site. Agriculture in Richmond is not dependent on prime agricultural soils. The project does not convert farmland to non-agricultural use.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility site is zoned for light industry, an applicable land use for this project. The facility is not located on or in proximity to land zoned for agriculture use, or under the Williamson Act contract.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility site is zoned for light industry and the land is developed. There is no new construction associated with the project that would change the existing environment or convert farmland to non-agricultural uses.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 3.0 Land and Urban Design Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8809>

Richmond General Plan 2030, Map 3.2b General Land Use Map, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8825>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.01 Land Use Consistency and Compatibility, February 11, 2011:

Contra Costa County Assessor's Office, Agricultural Property sector

3. Air Quality

Project Activities Likely to Create an Impact: Handling, storage and transfer of hazardous waste.

Description of Baseline Environmental Conditions: The Bay Area Air Quality Management District (BAAQMD) is the air quality management district with jurisdiction over the air basin at the site. The Veolia Facility is in the Northern Alameda Western Contra Costa air basin subregion. The subregion's western boundary is defined by the San Francisco Bay and its eastern boundary by the Oakland-Berkeley Hills. The Oakland-Berkeley Hills are a significant barrier to air flow having an approximate ridge line height of 1500 feet. The most densely populated area of the subregion is the land between the bay and the 500 foot elevation, averaging about 2 miles wide in Richmond.

In this area, marine air intrusion through the Golden Gate, across San Francisco, and through the San Bruno Gap is a dominant weather factor throughout the year. The Oakland-Berkeley Hills cause a bifurcation of westerly flow in the vicinity of Oakland, with southerly winds observed over the San Francisco Bay north of the Golden Gate and northwesterlies over the bay to the south of the Golden Gate. The divergent wind field results in diminished speed on the east side of the bay, with a higher frequency of near calm conditions than areas west of this split flow. Temperatures have a narrow range due to the proximity of the moderating marine air. Maximum temperatures in summer average in the upper 60's to low 70's degrees Fahrenheit, with minimums in the mid-50's. Winter highs are in the mid to high 50's and winter lows are in the low to mid-40's. Generally precipitation totals increase from south to north and from the lowlands to the Oakland-Berkeley Hills' ridge line. Richmond, the northern-most city of this zone, is ten miles northeast of the Golden Gate. At the BAAQMD's Point San Pablo meteorological station, 4½ miles west northwest of downtown Richmond, the prevailing direction is south southwesterly with over 50% of the winds coming from the south through southwest sector. The average wind speed at this station is 11 mph. Richmond's maximum summer temperatures average in the low 70's and minimums average in the mid-50's. In winter maximums are in the high 50's to low 60's and minimums are in the low to mid-40's. Average annual precipitation totals is near 22 inches.

The air pollution potential of the areas closest to the marine air is minor, due to frequent good ventilation and less influx of high pollutant concentrations from upwind sources. The location of the city of Richmond, downwind and surrounded by air pollution sources, coupled with a relatively high frequency of light winds mainly in the nighttime and early morning hours, could augment occasional higher pollutant levels.

According to the BAAQMD website information, the Bay area is non-attainment for ozone (both federal and state standards), particulate matter less than 10 microns in diameter (PM₁₀) (state standards), and particulate matter fine (PM_{2.5}) (federal and state standards). For the latest complete reporting year (2009), the air district exceeded the state 1-hour standard for ozone on 11 days, the state 8-hour standard for ozone on 13 days, the federal 8-hour standard for ozone on 8 days, the state 24-hour standard for PM₁₀ on 1 day, and the federal 24-hour standard for PM_{2.5} on 11 days. None of the exceedences occurred in the Richmond area subregion. However, in previous years (2004 – 2006) in Richmond the state 1-hour ozone standard was exceeded on one day and the state and federal annual average standards for PM₁₀ were exceeded once each year in 2004 and 2006.

Operations at the facility do not involve opening of containers (except in rare instances), processing of chemicals, or packaging of chemicals. There are no piping, vessel, flange, or other equipment where fugitive and other emissions might occur. The only routine operation that may result in emissions of toxic contaminants to air is the consolidation of petroleum-impacted soil and similar materials (such as absorbent material used to clean up spills) from drums into roll-off bins for efficient transportation to a disposal location. These materials could contain relatively non-volatile (not easily evaporated) oils and diesel fuel, but may also contain relatively volatile (easily vaporized) gasoline. During consolidation, some benzene, toluene, and other Volatile Organic Chemicals (VOCs) in the impacted soil may be released to air. A Health Risk Assessment was prepared for the proposed project to determine the risks associated with potential vapor releases due to the handling of petroleum-impacted soil. For the purposes of the risk assessment, benzene, toluene, xylenes, ethylbenzene, and naphthalene were evaluated as constituents of potential concern. Results of the risk assessment show that the risk is substantially below the *de minimus* level of 1×10^{-6} , and the hazard indices are substantially below 1. Risk and hazard from air emissions do not approach a level of concern.

No permit has been required by the BAAQMD nor is any permit from this agency needed in the foreseeable future.

Analysis as to whether or not project activities would:

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

Impact Analysis: The Bay Area Ozone Attainment Plan was adopted in June 1999. The Bay Area failed to attain the federal ozone standard by its 2000 deadline. As a result, the U.S. Environmental Protection Agency (U.S. EPA)

disapproved the Bay Area's 1999 Plan and required a new plan with an updated VOC and nitrogen oxides (NOx) emissions inventory, new transportation conformity budgets, and showing attainment of the federal ozone standard by 2006. In 2001 BAAQMD adopted the San Francisco Bay Area 2001 Ozone Attainment Plan for the 1-Hour National Ozone Standard (2001 Plan). The Bay Area 2010 Clean Air Plan (CAP) serves to update the Bay Area ozone plan.

U.S. EPA designated the Bay Area as non-attainment of the PM_{2.5} standard on October 8, 2009, with an effective date of the designation on December 14, 2009. BAAQMD has three years to develop a State Implementation Plan (SIP) that demonstrates how the Bay Area will achieve the standard by December 14, 2014. The SIP must be submitted to the U.S. EPA by December 14, 2012.

The proposed project is in a subregion of the air district that has not exceeded either the ozone or the PM_{2.5} standard. There are no activities proposed for the project that will cause an increase in either ozone or PM_{2.5}. The proposed project will not conflict with or obstruct implementation of the applicable air quality plans.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The operational emissions related to the proposed project are minimal. Project design and control features ensure compliance with BAAQMD air quality standards. The proposed project does not violate any air quality standard or contribute to an existing or projected air quality violation.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The proposed project does not involve new construction, an increase in number of employees, or an increase in shipments of waste which would result in additional vehicle trips. There are no activities proposed for the project that will cause an increase in either ozone or PM_{2.5}. The proposed project does not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under federal or state ambient air quality standards.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis: There are currently no sensitive receptors identified in the area that would be impacted from air emissions related to the proposed project. The proposed project does not expose sensitive receptors to substantial pollutant concentrations.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: There have been no odor complaints from existing operations. Because emissions levels are anticipated to be low the ventilation of soil and debris contaminated with petroleum hydrocarbons is not expected to generate noticeable or significant levels of odor. The proposed project will not create objectionable odors affecting a substantial number of people.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The nearest site of naturally occurring asbestos is in a portion of the Hayward Fault approximately 10 miles east of the site. The proposed project will not result in human exposure to naturally occurring asbestos.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond Final Draft General Plan, Chapter 7.0 Conservation, Natural Resources, and Open Space Element, April 25, 2012: <http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8812>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.03 Air Quality, February 11, 2011:

BAAQMD website pages:

http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_May%202011_5_3_11.ashx

<http://www.baaqmd.gov/Divisions/Communications-and-Outreach/Air-Quality-in-the-Bay-Area/Bay-Area-Climatology/Subregions/Northern-Alameda--Western-Contra-Costa-Counties-Region.aspx>

<http://www.baaqmd.gov/~media/Files/Communications%20and%20Outreach/Annual%20Bay%20Area%20Air%20Quality%20Summaries/pollsum09.ashx>

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, January 1992

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, Response to Comments, September 1992

4. Biological Resources

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: There are a number of special status plant and wildlife species located in Richmond. A California Department of Fish and Game Natural Diversity Database system (CNDDDB) Rarefind Survey search conducted on 12/1/2011 indicated that the project site contains no candidate, sensitive, or special status species of plants or animals. The site is located in an industrial area with no biological resources within a mile from the facility boundary. Special status species are those that have been officially recognized by federal and state resource agencies. Those special status plant species occurring in Richmond include: the Bent-Flowered Fiddleneck, Point Reyes Bird's-Beak, Soft Bird's-Beak, Western Leatherwood, Diablo Helianthella, Loma Prieta Hoita, Santa Cruz Tarplant, Oregon Meconella, Most Beautiful Jewel-Flower and Suisun March Aster. There are also many special status wildlife species located in Richmond including: the Monarch Butterfly, Bridge's Coast Range Shoulderband Snail, Green Sturgeon, Central California Coastal Steelhead, Central Valley Steelhead, Chinook Salmon, Longfin Smelt, California Red-Legged Frog, Western Pond Turtle, Alameda Whipsnake, Short-Eared Owl, Northern Harrier, Great Blue Heron, Great Egret, Snowy Egret, Black-Crowned Night Heron, White- Tailed Kite, Caspian Tern, California Black Rail, Saltmarsh Common Yellowthroat, San Pablo Song Sparrow, California Clapper Rail, California Least Tern, Pallid Bat, Silver-Haired Bat, Hoary Bat, San Pablo Vole, Salt Marsh Harvest Mouse and Salt Marsh Wandering Shrew.

The Veolia Facility is located in a business/light industrial zone. There are no natural plant, fish or wildlife habitats at the site or nearby area. Most of the facility is paved. The minimal landscaping at the facility is non-native vegetation. On-site vegetation would not be altered with the proposed project. The nearest potential habitat area is along the shoreline of the San Francisco Bay, which is located approximately one mile west of the facility. This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: The facility is located in a developed, industrialized area. No natural habitat exists within the facility boundary. Industrial practices and regulations require the processing of hazardous waste to be contained within the facility, preventing any impact from the facility from reaching the nearest natural setting. Truck traffic to and from the facility does not traverse any natural habitat in the area. The proposed project does not impact any species, sensitive or otherwise.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The site does not contain riparian habitat or other sensitive natural communities. The city of Richmond has not identified riparian corridors for protection or restoration in the vicinity of the facility. Therefore, the proposed project will not have a direct or indirect impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: There are no federally protected wetlands present at or within one mile of the site. The proposed project will not have an effect on federally protected wetlands.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility is located in an area zoned business/light industrial. Operations at the proposed project will not impact movement of any species, wildlife corridors, or wildlife nursery sites.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The Richmond Final Draft General Plan, Conservation, Natural Resources, and Open Space Element denotes local policies on protecting biological resources within the city. The proposed project does not conflict with the city's policies and ordinances.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The Richmond Final Draft General Plan, Conservation, Natural Resources, and Open Space Element denotes local policies, plans, and implementing actions for conserving biological resources within the city. The proposed project is consistent with the city of Richmond's plans. The proposed project is not within or adjacent to an area subject to a Habitat Conservation Plan or Natural Community Conservation Plan and would not conflict with the provisions of any such plan.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 7.0 Conservation, Natural Resources, and Open Space Element, April 25, 2012: <http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8812>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.04 Biological Resources, February 11, 2011

Nationwide Wetlands Inventory, US Fish and Wildlife Service: <http://www.fws.gov/wetlands/>

California Natural Diversity Database, California Department of Fish and Game:
<http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, January 1992

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, Response to Comments, September 1992

5. Cultural Resources

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: A Sacred Sites Inventory search was conducted by the Native American Heritage Commission (NAHC) on December 8, 2011. Results of the search did not indicate the presence of Native American cultural resources at or near the Project Site. The Point San Pablo area is known to contain archaeological sites connected to the Ohlone Indians, the earliest inhabitants of the Richmond area. Some of these have been determined to be eligible for National Register listing, such as the Ellis Landing Shellmound site and Stege Mounds Archaeological District. Officially recognized historical resources on the National Register of Historic Places include: Point Richmond Historic District; East Brother Light Station; Winehaven Historic District (Point Molate); Alvarado Park; Ford Motor Company Assembly Plant; Richmond Shipyard No. 3; Atchison Village; and Carquinez Hotel (former Hotel Don). Certain resources are recognized as having outstanding historic value and significance in relation to the World War II home front effort. These sites comprise the Rosie the Riveter/World War II Home Front National Historical Park. Resources include: Richmond Shipyard No. 3; Whirley Crane; SS Red Oak Victory Ship; Ford Motor Company Assembly Plant; Maritime Child Development Center; Ruth C. Powers Child Development Center; Kaiser-Permanente Field Hospital; Fire Station No. 67A; Atchison Village; Rosie the Riveter Memorial; Shimada Peace Memorial Park; Westshore (Lucretia Edwards) Park; Sheridan Observation Point Park; Barbara and Jay Vincent Park; and the Bay Trail/Esplanade. California State Historical Landmarks and registered properties include: East Brother Light Station; Giant Powder Works, Point Pinole Regional Park; Richmond Shipyards; Japanese Camp, Garrard Boulevard; La Hispano Liquor Store, 201 Macdonald Avenue; and Sociedad Catolica Regional Guadalup, 2002 Nevin Avenue.

According to a letter from the California Archaeological Inventory dated September 18, 1990, there was a possibility that prehistoric cultural resources may have existed because the facility is located near the historical marsh margin of Contra Costa County and within a ½ mile radius of a recorded prehistoric site. However, no archaeological resources have been identified in the vicinity of the facility.

The facility is located in an area zoned for business and light industrial activities. The entire facility property and surrounding properties have already been developed. No new construction is proposed for the project that would cause any previously unknown cultural resources to be discovered. This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: There are no significant historic resources at the facility or in the vicinity. No new construction is proposed for this project. The facility is located in an area zoned for business and light industrial activities. The entire facility property and surrounding properties have already been developed. The proposed project would not cause a change in the significance of a historical resource.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility is not located in an area known to contain archeological resources. No new construction is proposed for this project that would lead to discovery of any archeological resources. The facility is located in an area zoned for business and light industrial activities. The entire facility property and surrounding properties have already been developed. The proposed project would not cause a change in the significance of an archeological resource.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility is not located in an area known to contain paleontological resources or unique geologic features. No new construction is proposed for this project. The facility is located in an area zoned for business and light industrial activities. The entire facility property and surrounding properties have already been developed. The proposed project would not destroy any unique paleontological resources or unique geologic features.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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

Impact Analysis: No human remains are known to have existed at the site. The site is situated in a developed area designated for business/light industrial use. The property and surrounding property have already been developed. The proposed project would not disturb any human remains.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Janet Herbin, Principal Planner, Community and Economic Development Agency, City of Richmond, letter dated April 13, 2006

Environmental Impact Report Chapter 10. Cultural and Historic Resources, 10-B Nevin Redevelopment Plan Amendment, April 22, 2005

Richmond General Plan 2030, Chapter 14.0 Historic Resources Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8819>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.05 Cultural Resources, February 11, 2011:

City of Richmond Historic Structures Code: Chapter 6.06: <http://www.ci.richmond.ca.us/DocumentView.aspx?DID=321>

6. Geology and Soils

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: The topography of Richmond in the vicinity of the facility is characterized by a long marshy or occasionally hilly shoreline, and by extensive flatlands. Soil types found in Richmond include: Tierra Loam; Millsholm Loam; Los Osos Clay Loam; and Clear Lake Clay. The site is underlain by the Franciscan Formation. The majority of the coastal lowland areas are deep alluvium soils on top of the Franciscan assemblage. Alluvium is typically a mixture of inter-bedded stiff clays, silts, gravel, and sands. Portions of these soils are derived from the eastern hills and others were deposited by marine actions during the formation of San Francisco Bay. The uppermost geologically recent sediment is a marine deposit of soft gray silty clay known as Bay Mud. The facility sits on approximately 30 feet of clay and silty clay mixed with sand and/or gravelly clay. Clay is relatively firm and dense, providing a base not prone to ground failure.

The site is located in the vicinity of several seismic faults. The Hayward fault is the only known active fault within ten miles of the facility. The Hayward fault, approximately 1.7 miles northeast of the facility, is in an Alquist-Priolo Earthquake Fault Zone, or Special Studies Zone. Faults in such Special Studies Zones are described by the Division of Mines and Geology as “active” faults that show evidence of the following characteristics:

1. Topographic or physiographic expressions suggestive of recent fault movement;
2. Fault creep indicated by distortions of the works of man;
3. Records of surface rupture in historic times, either within or adjacent to the study area;
4. A history of seismic activity as recorded by instrumental means.

A characteristic feature of the Hayward fault is its well-expressed and relatively consistent fault creep. The moment magnitude of the maximum credible earthquake on the Hayward fault is 7.1.

The Wildcat fault, considered an inactive branch of the Hayward fault, runs approximately parallel and close to the Hayward fault. Another inactive fault within two miles of the facility is the San Pablo fault.

Liquefaction may occur when loose, unconsolidated, saturated fine- to medium-grained sandy soils are subjected to ground vibrations during a seismic event causing the soils to lose strength and behave as a liquid. The city of Richmond has identified liquefaction potential present in the area of the facility. However, the state has not identified and mapped any liquefaction hazard zones under the Seismic Hazards Mapping Act in the city of Richmond.

Expansive soil occurs in clay soils and results in the shrinking and swelling of such soils with change in moisture conditions. The shrinking and swelling cause problems with building foundations, slabs on-grade, and pavement, unless identified and addressed during design and correctly undertaken during construction. Expansive soil is prevalent in the Bay Plain area, the location of the facility.

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

Analysis as to whether or not project activities would:

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

Impact Analysis: The facility is more than 3,000 feet from an active earthquake fault which has displacement during the Holocene era, defined as the last approximately 11,000 years [California Code of Regulations, title 22, section

66270.14(b)(11)(A)]. There is no evidence that geologic faulting has occurred within a 3,000-foot radius of the facility. Although the proposed project is in a region with the potential for high seismic activity, the impacts from rupture of a known earthquake fault would be less than significant.

Facility structures are required to be built according to the applicable California Building Code to withstand seismic events, including ground shaking and liquefaction, without catastrophic failure. All units handling hazardous waste are required to have secondary containment to contain spills and precipitation runoff. These containment structures would also contain spillage as the result of a seismic event. The facility has had a Permit to store and transfer hazardous waste at this site since 1983. During its time in operation the facility experienced a major earthquake without incident. The impacts from strong seismic ground shaking or seismic-related ground failure would be less than significant.

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

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: No new construction is proposed for this project. The property and surrounding property have already been developed. There would not be substantial soil erosion or loss of topsoil from the project.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility has had a Permit to store and transfer hazardous waste at this site since 1983. No new construction is proposed for this project. Soil would not become unstable as a result of the project. The city of Richmond has identified liquefaction potential present in the area of the facility. However, the state has not identified and mapped any liquefaction hazard zones under the Seismic Hazards Mapping Act in the city of Richmond. The impacts from subsidence or liquefaction would be less than significant. The site is in an area with 5% or less slope and is considered stable with regard to landslide potential. The proposed project would not be impacted by landslides, lateral spreading, or collapse.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: No new construction is proposed for this project. The facility buildings were constructed according to the applicable California Building Code, and do not create substantial risks to life or property.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems

where sewers are not available for the disposal of water.

Impact Analysis: The facility is connected to the municipal sanitary sewer and storm drain system. Construction of a septic tank is not proposed for this project.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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

Impact Analysis: The nearest site of naturally occurring asbestos is in a portion of the Hayward Fault approximately 10 miles east of the site.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 12.0 Public Safety and Noise Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8819>

Richmond General Plan 2030, Chapter 7.0 Conservation, Natural Resources, and Open Space Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8812>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.07 Geology, Soils, and Minerals, February 11, 2011:

2010 Fault Activity Map of California, published by California Department of Conservation:
<http://www.quake.ca.gov/gmaps/FAM/faultactivitymap.html>

California Department of Conservation, Division of Mines and Geology Special Publication 42, Fault-Rupture Hazard Zones in California, Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps, Interim Revision 2007: <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>

Geotechnical Exploration Findings and Recommendations Report for Silicon Valley Rapid Transit by Earth Tech, 2003

California Department of Conservation, Division of Mines and Geology, The Revised 2002 California Probabilistic Seismic Hazard Maps, June 2003:
http://www.conservation.ca.gov/cgs/rghm/psha/fault_parameters/pdf/Documents/2002_CA_Hazard_Maps.pdf

California Department of Conservation, Division of Mines and Geology, The Revised 2002 California Probabilistic Seismic Hazard Maps, A Faults, June 2003:
http://www.conservation.ca.gov/cgs/rghm/psha/fault_parameters/pdf/Documents/Aflt.pdf

California Department of Conservation, Division of Mines and Geology, A General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos, dated August 2000:
ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/ofr_2000-019.pdf

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, January 1992

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, Response to Comments, September 1992

7. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact: Collection and transfer of hazardous waste.

Description of Baseline Environmental Conditions: The facility picks up and receives shipments of hazardous waste from off-site sources, consolidates some types of waste in roll-off bins, stores the waste in drums, and transports the waste to final disposal sites. Containers of waste that might emit greenhouse gases (GHGs - carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride) are typically not opened or handled in a way that would result in emissions. There are no stationary sources requiring Air District permits at the facility. The primary source of GHGs would be from vehicles shipping hazardous waste to and from the facility. Other sources include employee commuter travel, the generation of solid waste, emissions from forklifts, and use of natural gas, electricity, and water.

The city of Richmond has completed a GHG Inventory and is in the initial stages of preparing a Climate Action Plan. The county of Contra Costa has completed a Climate Action Plan for its own municipal activities but not for the community. Neither of these plans constitutes a GHG reduction plan which complies with Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006 (Nunez, 2006). Consequently, the Bay Area Air Quality Management District's (BAAQMD) California Environmental Quality Act Air Quality Guidelines (CEQA Guidelines) is used in this Initial Study to obtain information on GHG emissions, thresholds of significance, and applicable mitigation measures.

The BAAQMD CEQA Guidelines provides steps for evaluating air quality impacts, including GHGs, from land use development plans and projects. Proposed projects should be compared with the appropriate construction and operational screening criteria developed by BAAQMD. If the project meets the screening criteria and is consistent with the methodology used to develop the screening criteria, then its GHG impacts may be considered less than significant. Otherwise, the potential GHG impacts of the project should be evaluated against thresholds of significance developed by BAAQMD. If, after proper analysis, the project's GHG impacts are found to be below the significance thresholds, then the GHG impacts may be considered less than significant. If not, the lead agency should implement appropriate mitigation measures to reduce associated GHG impacts. The mitigated project's impacts are then compared again to the significance thresholds. If a project succeeded in mitigating its adverse GHG impacts below the corresponding thresholds, GHG impacts may be considered less than significant.

The BAAQMD screening criteria for GHGs were derived using the default emission assumptions in Urban Emissions 2007 (URBEMIS) environmental analysis software, and using off-model GHG estimates for indirect emissions from electrical generation, solid waste and water conveyance. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. For projects that are mixed-use, infill, and/or proximate to transit service and local services, GHG emissions would be less than the greenfield type project that these screening criteria are based on. Stationary-source emissions are not included in the screening estimates. The screening criteria are developed for land use types. For example, for a warehouse the operational GHG screening size is 64,000 square feet, while for a general light industry the operational GHG screening size is 121,000 square feet. Projects below the applicable size meet the screening criteria and would not exceed the thresholds of significance.

For projects that do not meet the screening criteria the potential air quality impacts from GHGs should be evaluated against thresholds of significance. BAAQMD has developed thresholds of significance for land use development plans, stationary source projects that require an Air District permit to operate, and projects other than stationary sources. BAAQMD's approach to developing a threshold of significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move towards climate stabilization. If annual emissions of GHGs exceed these threshold levels, the proposed project would result in a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact to global climate change. BAAQMD's GHG threshold is defined in terms of carbon dioxide equivalent (CO₂e), a metric that accounts for the emissions from various greenhouse gases based on their global warming potential. The threshold of significance for the operational-related emissions of a project other than a stationary source where this is no qualified GHG Reduction Strategy Plan is 1,100 metric tons of CO₂e/yr.

Analysis as to whether or not project activities would:

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

Impact Analysis: GHG emissions from mobile sources including transport trucks and employee commute trips, off-road vehicles (forklifts), solid waste, electricity, water and wastewater usage were calculated. Documentation detailing these calculations is provided in the attached May 23, 2011 report that Veolia submitted to DTSC (and which

was prepared by Veolia's consultant, Shaw Environmental, Inc.). The facility operations would generate approximately 151.78 metric tons CO₂e/yr of GHG emissions. The proposed project does not involve construction or an increase in operations or capacity. As the BAAQMD threshold of significance is 1,100 metric tons CO₂e/yr, the proposed project is not expected to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: There is no GHG Reduction Plan, either for the city of Richmond or Contra Costa County, with which the project must comply. The BAAQMD has established a Climate Protection Program to integrate climate protection activities into existing District programs. BAAQMD has updated its CEQA Guidelines to address adverse effects from global climate change by providing screening criteria, thresholds of significance, tools, and methodology to evaluate GHG emissions and ultimately contribute to their reduction. The proposed project complies with the BAAQMD's guidelines by ensuring that GHG emissions from the operation of the facility are below the BAAQMD's thresholds of significance. From a statewide perspective, the evaluation of GHG emissions from the proposed project meets the intent of AB 32 by ensuring that GHG emissions are less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Estimate and Evaluation of Greenhouse Gas Emissions and Criteria Air Pollutants Veolia ES Technical Service Richmond Facility, Permit Number CAT080014079, May 23, 2011

Richmond General Plan 2030, Chapter 8.0 Energy and Climate Change Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8813>

City of Richmond General Plan Draft Environmental Impact Report, Chapter 3.06 Climate Change, February 11, 2011:

Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines, updated May 2011:
http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA_GUIDELINES.aspx

California Climate Action Registry General Reporting Protocol, version 3.1 dated January 2009 (GRP), which provides general principles for GHG inventories

Governor's Executive Order S-3-05: <http://www.dot.ca.gov/hq/energy/ExecOrderS-3-05.htm>

Technical Advisory: CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review, June 2008, Office of Planning & Research: <http://opr.ca.gov/docs/june08-ceqa.pdf>

PSD and Title V Permitting Guidance for Greenhouse Gases, United States Environmental Protection Agency, Office of Air and Radiation, November 2010

8. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact: Handling, storage and transfer of hazardous waste.

Description of Baseline Environmental Conditions: The facility is a hazardous waste storage and transfer operation. The project involves the shipment, sorting, and temporary storage of closed containers, and the consolidation of petroleum-contaminated soil in 20, 30 or 40-cubic yard bins for more efficient transportation to a disposal location. Hazardous waste is received from off-site. The proposed project will not generate hazardous wastes or materials. Under the proposed project, the facility would be permitted to store a maximum of 24,255 gallons of hazardous waste in drums or similar containers and 60 cubic yards of hazardous waste in roll-off bins. The project does not involve an increase in capacity. Storage capacity is the maximum volume of waste allowed to be stored at the facility at any one time, and does not indicate the amount of waste that would be constantly present.

Because most hazardous wastes handled at the facility are containerized off-site and the containers are rarely opened, facility operations do not generally result in the potential for ongoing exposure to hazardous wastes. The containerization prevents exposure to the wastes, except in the event of an accident. Containers are stored in an authorized storage area with adequate secondary containment to contain any spillage. The only wastes that are not containerized are petroleum-contaminated soils and debris, which are consolidated in roll-off bins on-site. These wastes are considered hazardous because they contain elevated levels of certain toxic compounds associated with petroleum fuels (such as benzene and polynuclear aromatic hydrocarbons).

The hazardous waste facility permit specifies conditions to minimize impacts associated with the handling of this waste. The conditions include such topics as: containment, facility construction, fire prevention methods, safe handling practices, required OSHA safety training for workers, routine inspections, and record-keeping. Site security and fencing are also required to prevent exposure to wastes. The Permittee must follow the Waste Analysis Plan, which ensures proper knowledge of the waste to be handled. Potentially incompatible wastes are required to be segregated within the area. Transportation of the waste in and out of the facility must follow manifesting requirements and use certified vehicles. The facility is required to submit a Contingency Plan showing how the facility will respond to an emergency, including equipment available for emergency response, evacuation plan, and emergency arrangements with local fire, police, and other emergency responder agencies.

A Risk Assessment was completed for the proposed project to evaluate potential chemical releases associated with typical daily operations and to evaluate accidental releases from the facility. The Risk Assessment Report presents the risk assessment assumptions, models, and toxicity values that were employed in the analysis. The modeled consequences of chemical releases were evaluated by comparing the predicted chemical concentrations with appropriate criteria, and with the probability of an accidental release in a given scenario. Potential impacts were evaluated using four release scenarios:

1. Potential releases from routine operations (including petroleum-contaminated soil consolidation).
2. Potential accidental release of a gas from the facility.
3. Potential transportation accident release outside the facility.
4. Potential release related to a fire at the facility.

Potential health impacts from the four scenarios were evaluated in terms of cancer risk, noncancer risk or hazard quotients (HQs), and acute exposures based on acute toxicity [i.e., reference exposure levels (RELs) and immediately dangerous to life or health levels (IDLHs)].

1. Routine Operations Release Scenario - Consolidation of petroleum-contaminated soils into larger bins for off-site transport is the only routine operation at the facility that could result in the release of chemicals of potential concern (COPCs). Human health risks associated with releases from this activity were assessed using U.S. EPA emission rate models and the SCREEN3 air dispersion model. The assessment incorporated conservative estimates of exposure point concentrations. Based on this conservative analysis, potential cancer risks would be 2×10^{-7} for the nearest resident and 5×10^{-7} for the nearest commercial/industrial worker. These levels are below 1×10^{-6} , which is the U.S. EPA lifetime cancer risk threshold. Hazard quotients are below 1.0, which indicates that the exposure concentrations are below the RELs. Daily petroleum-contaminated soil consolidation operations at the facility would pose a less than significant risk to the neighboring population.

2. Accidental Release of a Gas Scenario - The accidental release scenario evaluated the probability and potential impacts of the release of an acutely toxic gas from a broken compressed gas cylinder. The probability of a chemical release as a result of a facility accident (including a natural disaster, such as an earthquake), is considered low, according to the rate used for chemical product wholesalers (i.e., facilities where chemicals are stored rather than

manufactured or processed). The chemical product wholesaler accident rate is 0.029 accidents per year. The probability of an accidental release at the Veolia facility is estimated to be 3 accidents over a 100-year period.

Two potential release cases were evaluated. The worst-case release was defined as the release of the largest quantity of a regulated substance from a vessel size that the facility receives. For the risk assessment, it was assumed that the largest cylinder size (i.e., a cylinder that holds 200 cubic feet of gas at standard temperature and pressure) may be damaged, that the cylinder was full, and that all chemical contents were released over a 10-minute period. Since the facility rarely receives the 200 cubic-foot capacity cylinders, a reasonable maximum exposure (RME) scenario was also examined. The majority of the cylinders managed at the facility are lecture bottles that hold small quantities of a chemical; the largest bottle containing 5.5 cubic feet of gas. These cylinders are typically shipped in 5-gallon containers with 2 to 4 cylinders embedded in packing material. The COPCs representative of this scenario included ammonia, chlorine, and hydrogen fluoride.

For the worst-case release the predicted average hourly concentrations of chlorine and hydrogen fluoride gas were greater than their respective acute RELs at a downwind distance of 200 yards, and would not exceed the 30-minute average IDLHs. These results indicate that there may be adverse health impacts to downwind residents, yet the exposure is not immediately dangerous. The adverse impacts from these concentrations are mild eye and respiratory irritation and would not be expected to persist after the exposure ceases. For the worst-case accidental release of a gas scenario the exposures in residential areas would not be expected to pose an immediate threat to life or cause irreversible or delayed adverse health effects.

For the RME release the predicted average hourly concentrations of all COPCs at the nearest residence were less than the acute RELs and the IDLHs. Thus, for the RME accidental release of a gas the exposures in residential areas would not be expected to pose an immediate threat to life or cause irreversible or delayed adverse health effects.

3. Transportation Accident Scenario - The transportation accident scenario evaluated the probability and potential impacts of the release of an acutely toxic gas from a broken compressed gas cylinder in the event that a truck transporting hazardous materials to or from the facility is in a traffic accident. The probability of a chemical release as a result of traffic accident is considered low. The estimated probability of an accidental release of hazardous material from a hazardous material transport truck accident near the facility is calculated to be 7.18×10^{-9} or less than one traffic accident with a release of hazardous material per 139,000,000 years. DOT packaging, which includes embedding the cylinders in packing material and heat shrink sealing the containers to pallets, reduces the probability of an accidental release from damaged cylinders.

The potential impacts of a gaseous chemical release were evaluated using the previously modeled accidental gas release and representing the same COPCs. As in the Accidental Release of a Gas Scenario, the predicted average hourly concentrations of chlorine and hydrogen fluoride gas were greater than their respective acute RELs at a downwind distance of 200 yards, and would not exceed the 30-minute average IDLHs. For the RME release the predicted average hourly concentrations of all COPCs at the nearest residence were less than the acute RELs and the IDLHs. For both the worst-case and the RME transportation accident scenarios the downwind exposures would not be expected to pose an immediate threat to life or cause irreversible or delayed adverse health effects.

4. Facility Fire Scenario - The facility fire scenario evaluated the probability and potential impacts of a chemical release using scenarios with and without automated sprinkler fire suppression systems. The probability of a chemical release as a result of a fire is considered very low. The estimated probability of a fire at the facility is 1 per 75 years. The probability of a release induced by a fire while off-loading the smaller, more typical, lecture bottles containing 5.5 cubic feet of gas is 1 per 160,000 years. The probability of a fire-induced release while off-loading the largest gas cylinder size is 1 per 650,000 years. The facility does not currently have a fire suppression system, however, a special condition in the Permit will require that a system be installed in the Flammable and Oxidizer Storage Bays. The probability of a fire being uncontained is further reduced by the proximity of the Richmond Fire Department station, which is located at 7th and Hensley Streets, approximately 1000 feet away from the facility gates.

Six potential release scenarios were evaluated, as follows:

No Fire Suppression System (Uncontrolled) -

Case 1 – release of chlorine gas, includes both a) worst-case, and b) RME scenarios

Case 2 – release of multiple chemicals from the Flammable Storage Bay

With Fire Suppression System (Controlled) -

Case 3 – benzene release with extinguishment

Case 4 – methylene chloride and hydrogen chloride release with extinguishment

Case 5 – arsenic release with extinguishment

Case 6 – benzene release with extinguishment and mitigation measures

Case 1a and 1b - The COPCs representative of these scenarios included benzene, chlorine (released from cylinder outside of Flammable Storage Bay), methylene chloride, hydrogen chloride, arsenic, and mercury. During an uncontrolled fire scenario, it was assumed that multiple COPCs from stored waste would be released by the fire simultaneously.

For both Cases 1a and 1b, the estimated exposure concentrations for all COPCs were less than their respective RELs, except for chlorine and arsenic. The predicted average hourly concentrations of chlorine are above the acute REL and less than the IDLH level. The potential adverse impacts would not persist after the exposure ceases. The REL for arsenic is based on a 4-hour averaging time. The predicted 4-hour average concentrations of arsenic are above the acute REL. However, the modeling assumes the fire would be contained within 1 to 2 hours. Therefore, a fire associated with normal storage conditions at the site would result in exposure concentrations of arsenic less than the REL.

Case 2 – The COPCs evaluated in Case 2 were the same as in Cases 1a and 1b. The estimated exposure concentrations for all COPCs were less than their respective RELs, except for arsenic. The predicted exposure concentrations of arsenic are above the acute REL. However, the modeling assumes the fire would be contained within 1 to 2 hours. Therefore, a fire associated with normal storage conditions at the site would result in exposure concentrations of arsenic less than the REL.

Case 3 – The COPC evaluated in Case 3 was benzene. The fire modeling results for a single container fire, extinguished by a fire suppression system, indicates that after extinguishment residual heat from the fire could continue to evaporate spilled fuel constituents. The air dispersion modeling results show that ambient air quality impacts from a small fire would be experienced closer to the facility than a large fire because thermal plume rise would be minimized due to the extinguishment process. The REL for benzene is based on a 6-hour averaging time. The predicted 6-hour average concentration of benzene is above the acute REL.

Case 4 – The COPCs evaluated in Case 4 were methylene chloride and hydrogen chloride released during a single container fire, extinguished by a fire suppression system. The predicted average hourly concentrations for both chemicals are below the acute RELs.

Case 5 – The COPC evaluated in Case 5 was arsenic released during a single container fire, extinguished by a fire suppression system. The predicted 4-hour average concentration of arsenic is above the acute REL. However, the modeling assumes the fire would be contained within 1 to 2 hours. Therefore, a fire associated with normal storage conditions at the site would result in exposure concentrations of arsenic less than the REL.

Case 6 – The COPC evaluated in Case 6 was benzene, and demonstrates the effect mitigation measures would have on the release scenario. Case 6 results show that a reduction of the spill surface area provided by a drainage sump, or the application of vapor suppression foam immediately following a fire, would significantly reduce emissions. The modeled mitigation measures suggested benzene exposure concentration would be reduced to a level only slightly greater than the acute REL.

Analysis as to whether or not project activities would:

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

Impact Analysis: A Risk Assessment was completed for the proposed project to evaluate potential chemical releases associated with routine daily operations. See discussion for risk assessment release scenario 1, above.

Consolidation of petroleum-contaminated soils into larger bins for off-site transport is the only routine operation at the facility that could result in the release of chemicals of potential concern (COPCs). The risk assessment evaluation predicted exposure concentrations for routine operations below the U.S. EPA lifetime cancer risk threshold and hazard quotients below reference levels. The proposed project would not create a significant hazard to the public or the environment during routine transport, use, or disposal of hazardous materials.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: A Risk Assessment was completed for the proposed project to evaluate potential chemical releases associated with typical daily operations and to evaluate accidental releases from the facility. Three accident scenarios were evaluated: potential accidental release of a gas from the facility, potential transportation accident release outside the facility, and potential release related to a fire at the facility. See discussion for risk assessment release scenarios 2, 3, and 4 above. The probability of a chemical release as a result of a fire is considered very low. The predicted exposures concentrations from accidental release of a gas and a transportation accident would not create a significant hazard to the public or the environment. The predicted exposure concentration for a fire involving a single container of benzene, with a fire suppression system in operation, would exceed the REL. With a fire suppression system in place, the predicted exposure concentration for a fire involving benzene would only slightly exceed the REL.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: A Risk Assessment was completed for the proposed project to evaluate potential chemical releases associated with typical daily operations and to evaluate accidental releases from the facility. The nearest school is Peres Elementary School located at 719 5th Street, Richmond, approximately 0.4 miles (700 yards) away from the site. The proposed project is not located and will not emit hazardous emissions within one-quarter mile of an existing or proposed school.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and would not create a significant hazard to the public or the environment.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility is required to submit a Contingency Plan showing how the facility will respond to an emergency, including equipment available for emergency response, evacuation plan, and emergency arrangements with local fire, police, and other emergency responder agencies. The facility Contingency Plan is the adopted emergency response plan. The proposed project will not impair implementation of any emergency response plan or emergency evacuation plan.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

RCRA Part B, Permit Application Risk Assessment, Veolia Environmental Services Facility, Shaw Environmental, Inc., January 31, 2007

Richmond General Plan 2030, Chapter 12.0 Public Safety and Noise Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8817>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.08 Hazardous Materials, February 11, 2011:

http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES%2COPEN%2CFUDS%2CCLOSE&status=ACT%2CBKLG%2CCOM&reporttitle=HAZARDOUS%20WASTE%20AND%20SUBSTANCES%20SITE%20LIST

Conditions of Conditional Use Permit (CUP) Approval, Hazardous Waste Storage and Transfer Station, 1125 Hensley Street, CU 92-49, Richmond Planning Commission, February 6, 1997

9. Hydrology and Water Quality

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: Richmond is located within both the San Pablo Basin and Central Basin Hydrologic Planning Areas. Creeks flowing through Richmond discharge to both the San Pablo Bay and San Francisco Bay. The facility is 2.0 miles from the San Pablo Bay. The largest watersheds are Wildcat Creek and San Pablo Creek. Wildcat Creek and San Pablo Creek are 0.9 miles and 1.3 miles from the facility, respectively. Wildcat Creek is listed on the 2007 Section 303(d) List of Impaired Water Bodies because of the presence of the pesticide, Diazinon.

This facility is not located in the 100-year flood plain. Locations of 100-year flood zones throughout Richmond are determined by the high level of poorly drained soils and impervious surfaces along the Bay Plain where the facility is located, obstructions to flow and proximity to the creeks and the bay, and storm drain system capacity constraints.

Richmond contracts with Veolia Water North America to operate and maintain its storm drainage facilities. The storm drain system is designed to handle the flow of a 10-year, 24-hour storm event. The existing system is generally inadequate for collecting and conveying that storm event. Drainage is influenced by the type and intensity of land use, which determines the extent of impervious (non-porous) surfaces. Soils are classified as poorly drained in the Bay Plain area. The infiltration rate of soils tends to be quite slow and, therefore, stormwater runoff would be high. The generally fine-grained nature of the clay and loam soils in Richmond tends to retard percolation into the water table, which is close to the surface in lower elevation areas.

Groundwater is approximately 13 to 24 feet below ground surface at the facility. Richmond is located above the Santa Clara Valley Groundwater Basin, East Bay Plain Subbasin. The East Bay Plain Subbasin is composed of unconsolidated sediments of Quaternary age (i.e., less than 1.6 million years old). The thickness of the deposits varies, from depths of one to a few hundred feet thick, depending on the proximity of the subbasin to the San Francisco Bay, with the sediments tending to increase with proximity to the bayshore. Sea water intrusion may contaminate groundwater below mean sea level (MSL), making it unsuitable for many beneficial uses. In the 2007 Basin Plan the East Bay Plain Subbasin is identified as having the following beneficial uses: municipal and domestic supply, agricultural supply, industrial service supply, and industrial process supply. Groundwater impairments listed in the Basin Plan include: industrial and agricultural chemical spills, underground and above-ground tank and sump leaks, landfill leachate, septic tank failures, and chemical seepage via shallow drainage wells and abandoned wells.

There are no designated seiche risk areas or tsunami evacuation zones within the city of Richmond. However, the maximum wave height, under a 'worst case' scenario created by a tsunami with an origin in the Aleutians islands, was modeled at about 7.5 feet along the Richmond Bay coast. The facility is located approximately 20 feet above MSL.

Surface water quality of the region is monitored by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB). The facility holds an Industrial Activities Storm Water General Permit issued by the SFBRWQCB. The permit requires that the facility notify the state, prepare and implement a Stormwater Pollution Prevention Plan, and monitor to determine the amount of pollutants leaving the site. Presently, there are two storm water drains at the facility. One receives surface water from the southeast half of the facility property, which is not the active portion of the facility. This drain is located on the southeastern portion of the property along Hensley Street. The second drain is located on the northwestern half of the site along Amstan Lane. This storm water drain receives surface water from the northwest portion of the facility. Surface water from the northern side of the facility (active portion of facility) is directed to collection grates and trenches which will be pumped to a holding tank to prohibit direct off-site discharge of stormwater runoff. In the event of a 24-hour, 25-year storm, stormwater runoff would exceed the tank capacity, and would be collected in the pit formed by the loading dock area. Prior to discharge the storm water will be analyzed. Depending on the results of the analysis, discharge could either occur to the Amstan Lane storm water drain or to the sanitary sewer system under the facility's City of Richmond, Wastewater Division, Industrial Wastewater Discharge Permit.

The hazardous waste storage units are surrounded by curb-type berms and have sloped entrances to provide secondary containment, which would prevent release of hazardous waste from unintentional spillage. The capacity of the secondary containment is equal to or greater than 10 percent of the maximum volume of containers in the storage areas. Containment of precipitation within the storage areas is not necessary since the storage areas are completely covered and protected from run-on by the berms. As no changes to the facility or its operations are proposed, this section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: The facility would continue to operate under an Industrial Activities Storm Water General Permit issued by the SFBRWQCB, and a City of Richmond, Wastewater Division, Industrial Wastewater Discharge Permit. The conditions established by these permits are incorporated into the proposed project. The proposed project would not violate any water quality standards or waste discharge requirements.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The proposed project is a renewal of an existing permit. No new activities or construction are proposed which would involve extraction of groundwater. Therefore, the proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficiency in aquifer volume or a lowering of the local groundwater table.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The proposed project is a renewal of an existing permit. No new activities or construction are proposed that would alter the existing drainage pattern of the site or area. There are no activities under the proposed project that would result in substantial erosion or siltation on or off-site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The proposed project is a renewal of an existing permit. No new activities or construction are proposed that would alter the existing drainage pattern of the site or area. There are no activities under the proposed project that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The proposed project is a renewal of an existing permit. No new activities or construction are proposed that would create or contribute runoff water which would exceed the capacity of existing or planned storm waste drainage systems or provide substantial additional sources of polluted runoff.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis: The facility would continue to operate under an Industrial Activities Storm Water General Permit issued by the SFBRWQCB, and a City of Richmond, Wastewater Division, Industrial Wastewater Discharge Permit. The conditions established by these permits are incorporated into the proposed project. The proposed project does not have the potential to substantially degrade water quality.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: This facility is not located in the 100-year flood plain. The proposed project is a renewal of an existing permit. No new activities or construction are proposed that would place structures within a 100-year flood hazard area.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

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

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

i. Inundation by seiche, tsunami or mudflow.

Impact Analysis: There are no designated seiche risk areas or tsunami evacuation zones in Richmond. The maximum wave height, under a 'worst case' scenario created by a tsunami with an origin in the Aleutians islands, was modeled at about 7.5 feet along the Richmond Bay coast. The facility is located approximately 20 feet above MSL and would not be inundated by seiche or tsunami. The site is in an area with 5% or less slope and would not be subject to mudflows.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

FEMA Flood Insurance Rate Map of the City of Richmond, California, in the County of Contra Costa (Community-Panel Number 0600350020 C)

Richmond General Plan 2030, Chapter 7.0 Conservation, Natural Resources, and Open Space Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8812>

Richmond General Plan 2030, Chapter 12.0 Public Safety and Noise Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8817>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.09 Hydrology and Water Quality, February 11, 2011

10. Land Use and Planning

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: The city of Richmond zoning designation for the site is light industrial district (M2). The Zoning Ordinance states that the M2 zone is intended to “create, preserve, and enhance areas containing manufacturing, warehousing, trucking and distribution oriented uses, and related establishments with limited external impact on the surrounding area within an open and attractive setting (15.04.320).”

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

Analysis as to whether or not project activities would:

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

Impact Analysis: The Richmond General Plan (Plan) and the city of Richmond Zoning Ordinance (Ordinance) are the applicable land use plans. The facility holds a Conditional Use Permit issued in 1997 for operation at the site. The project would represent a continuation of uses at the existing facility. The site position and facility operations are consistent with the Plan and Ordinance, and do not conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The Richmond Final Draft General Plan, Conservation, Natural Resources and Open Space Element contains a policy to preserve and restore the natural habitat within the city of Richmond. Implementing actions include working with Contra Costa County and the East Bay Regional Park District to develop habitat conservation plans. The project does not conflict with any existing or applicable habitat conservation plans or natural community conservation plans.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 3.0 Land and Urban Design Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8809>

Richmond General Plan 2030, Map 3.2b General Land Use Map, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8825>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.01 Land Use Consistency and Compatibility, February 11, 2011

Zoning Ordinance, City of Richmond Chapter 15.04.320, March 2010:
<http://www.ci.richmond.ca.us/DocumentView.aspx?DID=315>

Conditions of Conditional Use Permit (CUP) Approval, Hazardous Waste Storage and Transfer Station, 1125 Hensley Street, CU 92-49, Richmond Planning Commission, February 6, 1997

Richmond General Plan 2030, Chapter 7.0 Conservation, Natural Resources and Open Space Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8812>

11. Mineral Resources

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: Mineral production in Richmond has been largely limited to sand, gravel, and rock products. No mineral extraction has occurred at the site. This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: No new construction requiring these products is proposed for this project. No mineral resources occur on the facility site. There would be no loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The site is urbanized and developed and therefore is not a mineral resource recovery site. There would be no loss of availability of a locally-important mineral resource recovery site. There are no mineral resource recovery sites delineated on any local general plans, specific plans or other land use plans in the city of Richmond.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 7.0 Conservation, Natural Resources, and Open Space Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8812>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.07 Geology, Soils, and Minerals, February 11, 2011:

California Department of Conservation, California Geological Survey/USGS Mineral Resources map (2003)

12. Noise

Project Activities Likely to Create an Impact: Handling, storage and transfer of hazardous waste.

Description of Baseline Environmental Conditions: Ambient noise levels are typical of a light industrial area, generally consisting of traffic noise. Noise is also generated from the use of propane-fueled fork trucks and similar equipment for management of the containerized wastes. Tractor trailers enter and leave the site during the day. The estimated noise levels at the nearest residences are approximately 55-65 dBA, which is classified as normally acceptable for low density residential areas. Predicted ambient noise levels from traffic on the Richmond Parkway in the vicinity of the facility are 59.9 dBA, decreasing with distance from the road.

Analysis as to whether or not project activities would:

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

Impact Analysis: The city of Richmond Municipal Code establishes noise limits for light industrial areas. The allowable exterior noise levels are 70 dBA measured at the property line and not to be exceeded for more than 30 minutes in an hour, and 50 dBA measured at the closest residential area and not to be exceeded for more than 5 minutes in any hour between 10:00 p.m. and 7:00 a.m. No severely noisy equipment or procedures are associated with the existing facility. No new construction is proposed for this project. In addition, the buildings reduce exterior noise levels by 10-15 dBA. The project will not expose persons to or generate noise levels in excess of established local standards.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: No aspect of the project is anticipated to generate excessive vibration or groundbourne noise levels. This project is a renewal of an existing permit. No new activities or construction are proposed.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: This project is a renewal of an existing permit. No new activities or construction are proposed which would cause a substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: This project is a renewal of an existing permit. No new activities or construction are proposed which would cause a substantial temporary or periodic increase in ambient noise levels in the vicinity above levels existing without the project.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 12.0 Public Safety and Noise Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8817>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.10 Noise, February 11, 2011:

City of Richmond Noise Ordinance Section 9.52.100 – Exterior Noise Standards

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, January 1992

City of Richmond, California Advanced Environmental Technology Corporation Facility Modifications, Expanded Initial Study, Response to Comments, September 1992

Site Visits

13. Population and Housing

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: There are nine employees at the facility. No increase in number of employees is anticipated. This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: The proposed project would not induce substantial population growth either directly or indirectly nor would it substantially increase the number of workers in the area on a daily basis.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: No new construction is proposed at the facility. The proposed project would not displace existing housing.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: No new construction is proposed at the facility. The proposed project would not displace substantial numbers of people nor require replacement housing.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, April 25, 2012

Richmond General Plan Draft Environmental Impact Report, Chapter 3.02 Demographics, February 11, 2011

14. Public Services

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: Fire protection is provided by the Richmond Fire Department. The nearest station is located at 7th and Hensley Streets, approximately 1000 feet away from the facility gates. Police protection is provided by the Richmond Police Department. The facility is in the Central District. Area schools are operated by the West Contra Costa Unified School District. The nearest school is Peres Elementary School located at 719 5th Street, Richmond, approximately 0.4 miles from the site. City parks are operated by the Richmond Recreation Department. The nearest parks are located ½ mile from the facility. The Shields-Reid Community Center is located at 1410 Kelsey Street, about ½ mile north of the site. This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

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

Impact Analysis: No new activities or construction is proposed. The project does not include an increase in facility size or operating capacity. The proposed project will not require additional fire or police protection services or facilities beyond those currently existing. The project will not impact existing fire or police ratios, response times or other performance objectives. The proposed project will not result in an increase in the existing employee workforce that otherwise may have necessitated the construction of additional schools, parks, or other public facilities.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond Plan 2030, Chapter 12.0 Public Safety and Noise Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8817>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.12 Public Services, August 15, 2011

15. Recreation

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: City parks are operated by the Richmond Recreation Department. The nearest city parks are located ½ mile away. The East Bay Regional Park District operates regional parks in the area, including Point Pinole and Wildcat Canyon. The regional parks are more than five miles from the facility. The San Francisco Bay Trail project in Richmond has completed a section of a connector trail between these two parks. At its closest point the trail is more than one mile from the facility. The National Park Service operates the Rosie the Riveter/World War II Home Front National Historical Park, located more than two miles from the facility. This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: The proposed project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

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

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Map10.1 Parks, Trails and Open Space , April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8853>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.11 Parks and Recreation, February 11, 2011

16. Transportation and Traffic

Project Activities Likely to Create an Impact: Handling, storage and transfer of hazardous waste.

Description of Baseline Environmental Conditions: This project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity. The facility generates traffic associated with employees and truck activity. Approximately 20 vehicles enter and leave the facility daily. These include approximately 15 automobiles for employees and visitors, 3 service vehicles ranging in size from 8 feet to 20 feet, and 2 tractor trailers. Delivery and shipments of packaged hazardous wastes to and from the facility occur during operating hours, 7:00 a.m. to 6:30 p.m. Monday through Friday. Veolia requires that trucks schedule arrival times with the facility to space out deliveries and pickups, which also has the effect of minimizing traffic congestion. The proposed project would not increase the number of daily delivery trucks bringing wastes to the site or shipping hazardous waste away from the site.

Trucks transporting hazardous wastes to and from the project site use Hensley Street to Richmond Parkway, then Interstate 580 (I-580) or Cutting Boulevard to Interstate 80 (I-80). Richmond Parkway is a four to six lane regional connector for traffic traveling between I-80 and I-580 for both commercial and residential traffic. Hensley Street intersects with Richmond Parkway. Hensley is a wide two lane street, passing through an industrial area. Turns at the intersection are controlled by a signal. The Veolia facility is less than ½ mile from the intersection of Richmond and Hensley. Hensley intersects 7th Street between Richmond Parkway and the facility. The intersection is controlled by a stop sign. All roads are fairly straight, with slight curves or bends. There are no highway on-ramps/off-ramps in the local travel area of the site, so there are limited areas of traffic conflict. The routing avoids residential streets. The only exception to this route is to provide service to local generators. In compliance with policy in the Hazardous Materials Element of the city of Richmond General Plan, hazardous materials being directly transported from one location to another (“through-transport”) must use routes with the least overall travel time (e.g., major roadways/highways instead of local streets).

Analysis as to whether or not project activities would:

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

Impact Analysis: This project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity. The proposed project would not cause an increase in traffic which would impact the existing traffic load and capacity of the street system. No impact on transportation is anticipated since the facility is expected to maintain current capacities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The Level of Service (LOS) standard for city of Richmond major connectors is LOS D. LOS D is characterized by congestion with average vehicle speeds decreasing below the motorist’s desired level. The current LOS for the segment of Richmond Parkway nearest the facility is Level A. LOS A/B are characterized by light congestion with motorists generally able to maintain desired speeds on two and four lane roads and make lane changes on four lane roads. Motorists are able to pass through traffic-controlled intersections in one green phase.

The total traffic load on Richmond Parkway is expected to increase modestly through 2030, with a 10% increase in west bound traffic and a 23% increase in east bound traffic. This project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity. The current LOS is well within the standard and traffic increase is expected to be modest during the term of the permit. The proposed project would not cause the LOS standard to be exceeded, either individually or cumulatively.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated

- Less Than Significant Impact
 No Impact

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

Impact Analysis: The streets in the area have been developed for industrial uses and are wide and relatively straight. There are no highway ramps, sharp curves, busy intersections or other immediately dangerous traffic conditions at or in the vicinity of the site. The proposed project is a renewal of an existing permit. No new activities or construction are proposed which would increase hazards due to a transportation design feature.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Result in inadequate emergency access.

Impact Analysis: The proposed project will not alter the outside traffic approach to or from facility, or alter the traffic pattern within the facility. The main entry is from Hensley Street. Access for emergency vehicles has been improved by providing a second entry/exit on Amstan Lane. Amstan Lane is not a through street. The only exit from Amstan Lane is through the facility. Vehicles using Amstan Lane would use the same routing (i.e., Hensley and Richmond Parkway) between the site and 1-580. The proposed project is a renewal of an existing permit. No new activities or construction are proposed which would result in inadequate emergency access.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Result in inadequate parking capacity.

Impact Analysis: There is capacity for 4 tractor trailers and approximately 10 cars at the site. Parking spaces for employees are provided on the facility's property. There is no off-site parking in the immediate area of the facility, other than street parking. These spaces are sufficient to allow for employee and visitor parking, trucks waiting for unloading wastes, and trucks being unloaded. This project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity. Therefore, the project will not result in inadequate parking capacity.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The applicable circulation policies and plans are contained in the Richmond Final Draft General Plan, Chapter 4.0 Circulation Element and the West County Action Plan for Routes of Regional Significance—2009 Update. These contain implementing actions related to walking and bicycling patterns and facilities, public transit including bus, regional transit, and ferry service, goods movement, as well as vehicle traffic. This project is a renewal of an existing permit. No new activities or construction are proposed. The project would not impact policies, plans, or programs supporting alternative transportation.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

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Site Visits

17. Utilities and Service Systems

Project Activities Likely to Create an Impact: None, this project is a renewal of an existing permit. No new activities or construction are proposed. The project does not include an increase in facility size or operating capacity.

Description of Baseline Environmental Conditions: This section is not applicable to the proposed project and related activities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis: The Regional Water Quality Control Board has not imposed discharge requirements, however, the facility has an Industrial Wastewater Discharge Permit issued by the city of Richmond, Wastewater Division which contains discharge limits. The project will not exceed wastewater treatment requirements.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The number of employees at the facility will not increase. Operations are not dependent on water use. The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility holds an Industrial Activities Storm Water General Permit issued by the SFBRWQCB. The facility has a system to capture and retain runoff from the active portion of the site for testing to determine if the waters meet the discharge requirements to either the storm water drain or to the sanitary sewer system. There is no need for construction of new storm water drainage or expand existing facilities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: Water is supplied by the East Bay Municipal Utility District. No change in the volume of water needed is anticipated. There are sufficient water supplies available to serve the project from existing entitlements and resources.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: This project is a renewal of an existing permit. No new activities or construction are proposed. The wastewater treatment provider which serves the project would not be required to determine whether it has adequate capacity to serve the project demand.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: The facility itself would not generate wastes that would be landfilled. However, the facility does manage wastes that have been previously accepted by a treatment or disposal facility. This project would not impact the capacity of the landfills to accommodate the project's disposal needs for either solid or hazardous wastes.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis: This project involves the renewal of a hazardous waste facility permit that will allow the facility to continue operating in compliance with federal and state statutes and regulations concerning hazardous waste. The proposed project would facilitate the handling of hazardous solid waste in the region. None of the activities allowed by this project are anticipated to conflict with federal, state and/or local statutes and regulations related to solid waste. The permit specifically states that the facility must comply with all environmental statutes and regulations.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

Richmond General Plan 2030, Chapter 6.0 Community Facilities and Infrastructure Element, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8811>

Richmond General Plan 2030, Map 6.1 Community Facilities, April 25, 2012:
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8848>

Richmond General Plan Draft Environmental Impact Report, Chapter 3.13 Public Utilities, February 11, 2011:

Mandatory Findings of Significance

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

- a. The project has does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.
- b. The project has does not have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.
- c. The project has does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

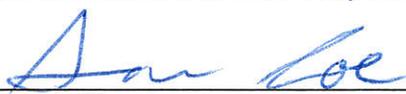
Determination of Appropriate Environmental Document:

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

- The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.
- The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.
- The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.
- The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.
- The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

Certification:

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



 Preparer's Signature

Sam Coe

 Preparer's Name

Project Manager

 Preparer's Title

6/24/2014

 Date

916-255-3587

 Phone #

ATTACHMENT A

REFERENCES

BAAQMD website pages:

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<http://www.baaqmd.gov/Divisions/Communications-and-Outreach/Air-Quality-in-the-Bay-Area/Bay-Area-Climatology/Subregions/Northern-Alameda--Western-Contra-Costa-Counties-Region.aspx>

<http://www.baaqmd.gov/~media/Files/Communications%20and%20Outreach/Annual%20Bay%20Area%20Air%20Quality%20Summaries/pollsum09.ashx>

Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines, updated May 2011:
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California Climate Action Registry General Reporting Protocol, version 3.1 dated January 2009 (GRP), which provides general principles for GHG inventories

California Department of Conservation, California Geological Survey/USGS Mineral Resources map (2003)

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California Department of Toxic Substances Control: http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

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<http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>

California Scenic Highway Mapping System: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm

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Janet Herbin, Principal Planner, Community and Economic Development Agency, City of Richmond, letter dated April 13, 2006

Part B Permit Renewal Application, Hazardous Waste Transfer, Recycling, and Storage Facility, Veolia ES Technical Solutions, LLC, Richmond, California, dated January 2012

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Figure 1



Figure 2

