

City of Los Angeles

City of Los Angeles Local Enforcement Agency
221 N. Figueroa Street, Rm. 1250
Los Angeles, CA 90012

ADDENDUM TO FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

South Los Angeles Community Plan Area

**Active Recycling Company, Inc.
2000 W. Slauson Avenue
LOS ANGELES, CALIFORNIA 90047**

**CASE NUMBER: SWIS 19-AR-1250
SCH# 2013111058**

Project Location: 2000 W. Slauson Avenue
Council District: 8

Project Description: The subject of the current addendum entails replacing 300 tons per day of permitted scrap metal processing and storage with 300 tons per day of curbside recyclables processing and storage within an existing permitted 500 ton per day solid waste transfer and processing facility. No increase in the maximum overall throughput of 800 tons per day is being proposed.

APPLICANT:	PREPARED BY:	ON BEHALF OF:
Active Recycling Company, Inc	L. Miner and Associates, Inc.	Los Angeles City Local Enforcement Agency

March 2023

Contents

SECTION 1. INTRODUCTION..... 2

 1.1 Introduction..... 2

 1.2 Project Information 2

 1.3 Organization of Addendum..... 2

SECTION 2. PROJECT DESCRIPTION 4

 2.1 Project Location 4

 2.1 Project Background..... 4

SECTION 3. RATIONALE FOR ADDENDUM..... 5

SECTION 4. ENVIRONMENTAL IMPACT ANALYSIS 7

SECTION 5. CEQA DETERMINATION..... 13

SECTION 1. INTRODUCTION

1.1 Introduction

In 2017 Active Recycling obtained a Large Volume Solid Waste Facility Permit from the California Department of Resources Recycling and Recovery (CalRecycle) and the Local Enforcement Agency (LEA) which is part of the Los Angeles Department of Building and Safety Environmental Affairs Division to process and transfer up to 500 tons of mixed solid waste per day and up to 300 tons of scrap metal within a 38,500 square foot processing area (referred to as the “Approved Project”). A Mitigated Negative Declaration (SCH #2013111058) for the Approved Project was adopted by the City of Los Angeles, Department of Building and Safety, Local Enforcement Agency on May 30, 2017, and a Notice of Determination (NOD) was filed with the Los Angeles County Clerk on May 30, 2017.

An Addendum has been prepared to assess the proposed minor technical changes and modifications to the MND. All information presented below is merely a minor change to the Approved Project, or helps clarify, amplify, or make insignificant minor technical modifications to the MND. As discussed in the following sections, the new information is not considered "significant" pursuant to CEQA, and circulation or preparation of a new formal environmental document is not required (see Guidelines Section 15164). Aside from the proposed modifications described below, all other impact analyses and associated mitigation measures proposed within the MND would remain unchanged.

The purpose of this Addendum is to address the potential environmental impacts associated with:

1. Replacing the 300 tons per day of scrap metal processing and storage area within an existing permitted solid waste facility with 300 tons per day of processing and storage of source separated curbside recyclables. There will not be any increase in overall permitted tonnage, processing area or hours of operation.

1.2 Project Information

Project Title:	Active Recycling MRF and Transfer Station.
Project Location:	2000 W. Slauson Avenue, Los Angeles, CA 90047
Project Applicant:	Active Recycling Company, Inc.
Lead Agency:	City of Los Angeles Local Enforcement Agency

1.3 Organization of Addendum

1. **Introduction:** This section provides introductory information such as the Project title, the Project applicant, and the lead agency for the Revised Project.
2. **Project Description:** This section provides a detailed description of the Revised Project, including Project characteristics and environmental review requirements.

3. **Rationale for Addendum:** This section contains the rationale for preparing an Addendum pursuant to Section 15164 of the State CEQA Guidelines.
4. **Environmental Impact Analysis:** This section contains a summary of the environmental impacts disclosed in the prior MND for each environmental issue area. The evaluation includes an analysis of how any of the environmental factors may be altered because of the Revised Project.
5. **CEQA Determination:** This section contains the lead agency's CEQA determination pursuant to Sections 15162 and 15164 of the State CEQA Guidelines.

SECTION 2. PROJECT DESCRIPTION

2.1 Project Location

The project site is located at 2000 W. Slauson Avenue between Wilton Place and Western Avenue in the City of Los Angeles, encompassing .88 acres (38,500 square feet) of land within the South Los Angeles Community Plan area.

2.1 Project Background

Entitlement History

On May 30, 2017, the City of Los Angeles, Department of Building and Safety, Local Enforcement Agency approved a Mitigated Negative Declaration (MND) (reference SCH #2013111058) for Active Recycling to operate a large volume solid waste facility with a maximum throughput of 500 tons per day (TPD) of mixed solid waste in conjunction with a 300 TPD scrap metal processing operation (the “Approved Project”). A Notice of Determination was filed with the County Clerk on May 30, 2017. A large volume solid waste facility permit (reference Facility Permit Number 19-AR-1250) was subsequently issued by the LEA on October 12, 2017, and concurred by CalRecycle on October 11, 2017.

ANTICIPATED APPROVAL

- Approval of a Solid Waste Facility Permit Modification and Report of Facility Information Amendment by the City Local Enforcement Agency with concurrence by CalRecycle.

SECTION 3. RATIONALE FOR ADDENDUM

Section 15160 of the CEQA Guidelines provides that there are several mechanisms, and variations in environmental documents, that can be tailored to different situations and intended uses of environmental review. Specifically, Section 15160 states that the " ... variations listed [including Subsequent EIRs, Supplemental EIRs, and Addendums] are not exclusive. Lead agencies may use other variations consistent with the Guidelines to meet the needs of other circumstances." This provision allows Lead agencies to tailor the use of CEQA mechanisms (such as this Addendum) to fit the circumstances presented to the Lead agency by a project. Here, the City LEA has opted to prepare an Addendum to assess the minor modifications of the Project that have transpired since preparation of the MND.

Specifically, Section 15164 of the CEQA Guidelines states:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Section 15162 of the CEQA Guidelines provides the criteria for preparing a Subsequent EIR or new Negative Declaration. Specifically, a Subsequent EIR or new Negative Declaration is required when there are substantial changes to a project that involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects; substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previously approved MND; or new information of substantial importance, which was not known and could not have been known with reasonable diligence at the time the previous MND was certified, show more or more severe significant effects, new feasible mitigation measures or alternatives are available but not adopted.

As provided in subsection (e) of Section 15164 of the CEQA Guidelines, substantial evidence supporting the Lead agency's decision not to prepare a Subsequent EIR or new Negative Declaration pursuant to CEQA Guidelines Section 15162 is provided in Section 4, Environmental Impact Analysis, of this Addendum. The environmental analysis presented in Section 4 evaluates the potential impacts of the result from the replacement of 300 tons per day of scrap metal storage and processing with 300 tons per day of source separated curbside recyclables processing in relation to the current environmental conditions and in consideration of the environmental findings for the Project.

ADDENDUM TO THE MND

Active Recycling MRF and Transfer Station

As summarized in Section 2, Project Description, and further analyzed in greater detail in Section 4, Environmental Impact Analysis, the changes proposed are relatively minor and would not result in any new significant environmental impacts. The analysis contained herein demonstrates that all of the impact issues previously examined in the approved MND would remain unchanged with the proposed modifications. The replacement of scrap metal storage and processing area with storage of source separated curbside recyclables would result in little to no changes with respect to the environmental impact conclusions analyzed for the Project.

Therefore, as described in further detail in Section 4, the analysis of the proposed increase in storage area for source separated curbside recyclables supports the determination that the proposed changes would not involve new significant environmental effects or result in a substantial increase in the severity of previously identified significant effects which would call for, as provided in Section 15162 of the State CEQA Guidelines, the preparation of a Subsequent EIR or Negative Declaration. Therefore, the City has elected to prepare this variation of an Addendum to the approved MND as the appropriate form of documentation to meet the statutory requirements of CEQA.

SECTION 4. ENVIRONMENTAL IMPACT ANALYSIS

The following analysis addresses the environmental issues that were previously analyzed in the MND for the Approved Project and determines if replacing 300 tons per day of scrap metal processing and storage with 300 tons per day of curbside recycling materials processing and storage will create any new significant impacts or increases the severity of an environmental impact as identified in the previously approved MND. The 800 tons per day of total material permitted to be processed will not change. Provided below is an assessment of how the revised project affects the conclusions of each respective environmental issue analyzed in the MND.

- **Aesthetics.** The revised project will replace an outdoor scrap metal processing and storage area with an outdoor recyclable material processing and storage area. The scrap metal storage and processing area, which encompasses approximately 6,300 square feet in area with a pile height of approximately 10 feet, will not change under the revised project. The project site is located in an industrial, urbanized, setting, and walls and fences screen onsite operations from view. A 7-ft wide landscaped berm runs between the highway frontage security fence and a 7.5-ft solid fence that runs parallel to the frontage. A 20-ft high wall made up of a combination brick wall topped by chain link fence surrounds the remainder of the site.

Since the site is located in an industrial, urbanized area, and all operations are conducted within a screened area, no aesthetic impacts would result from replacing the 300 TPD of scrap metal processing and storage with 300 tons per day of curbside recyclables processing and storage.

- **Agriculture and Forestry Resources.** As with the Approved Project, no impacts to agriculture and forestry resources would result from replacing the 300 TPD of scrap metal processing and storage with 300 tons per day of curbside recyclables processing and storage.
- **Air Quality.** Based on the existing levels of traffic and equipment operations associated with processing 300 tons of scrap metal, the proposed replacement of scrap metal processing with 300 tons of curbside recyclables would be anticipated to generate similar traffic levels and equipment operating times and as such would not result in an increase in emissions or violation of air quality standards.

While environmental impacts may result due to the presence of odors in the 300 tons of additional recyclable materials processed, a review of records on the State Solid Waste Information System found that no odor issues have been raised by the Local Enforcement Agency related to the 500 tons of recyclables processed under the current solid waste facility permit. The last inspection by the Local Enforcement Agency (LEA) on February 27, 2023, specifically stated that “there wasn't [sic] any malodors detected”. It should also be noted that the inspection was conducted while Active Recycling was operating under an emergency waiver from the LEA due to the COVID-19 pandemic that allowed an additional 250 TPD of curbside recyclable material to be processed onsite.

The Active Recycling Facility employs good housekeeping and has implemented an Alternative Odor Management Plan (AOMP) which has been approved and is enforced by the Local Enforcement Agency in accordance with the requirements of SCAQMD Rule 410.

The Active AOMP will be updated to include a misting system over the expanded curbside recyclables processing and storage area and will include the following existing and revised operations and procedures:

1. All incoming loads are checked for excessive odor and any such loads are rejected at the scale house.
 2. Should odiferous material be found in the tipping areas, it will be immediately sprayed with a deodorizer and loaded out in the next transfer truck leaving the site.
 3. An overhead sprinkler system to water the tipping and transfer/load-out areas is used to control potential odor carrying particulates. The height of the misting system and coverage will be adjusted as recommended by the LEA to provide adequate coverage of all material tipping and load-out areas.
 4. All material received at the facility must be containerized or transferred from the facility by 8:00 p.m. each night. Material will be processed on a first in, first out, basis.
 5. Regular site inspections will be conducted by site supervisor(s) to assure that all organic matter is removed as required, the facility is cleaned on a daily basis and to minimize any other source of odors on site.
 6. The receiving/transfer area, where residue from waste transfer, recycling or material recovery operations can accumulate, will be swept and cleaned throughout the day.
- **Biological Resources.** No biological resources including habitat for sensitive species, riparian habitat or wetlands exist on site, and the site is currently developed with industrial recycling and office uses. As with the Approved Project, no impacts to biological resources would result from replacing 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
 - **Tribal Cultural Resources.** Since the MND was adopted, there has been a change in circumstances. Assembly Bill 52 (AB-52) became effective on July 1, 2015. AB-52 requires that tribal cultural resources (TCRs) be evaluated under CEQA. However, AB-52 consultation does not apply in this case because the environmental document is not a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report. As with the Approved Project, no impacts to cultural resources would result from replacing the scrap metal storage pile with curbside recyclables storage and processing.
 - **Geology and Soils.** No new construction is proposed and employees and customers on the project site will not be subject to adverse impacts resulting from fault rupture as the site is not located in an Alquist Priolo Zone. As with the proposed project, no geology or soils impacts would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.

- **Greenhouse Gas Emissions.** As with the Approved Project, no impacts from greenhouse gas emissions would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage. The proposed project would not result in an increase of either onsite equipment operations or overall traffic emissions and would likely result in a net decrease in in greenhouse gas emissions. The heavy equipment used to process scrap metal requires higher engine loads when compared to processing curbside recyclables so equipment emissions would likely be decreased under the proposed project. In addition, most scrap metal is brought to the facility in self-haul vehicles such as pick-up trucks which are fueled by gasoline and diesel, whereas curbside material is brought to the facility in municipal collection trucks which are fueled by CNG, which per the US EPA, creates fewer smog-related tailpipe emissions than gasoline, and can reduce tailpipe GHGs by about 20%.¹ Since there will not be any increase in direct emissions of greenhouse gas related to processing curbside recyclables in lieu of scrap metal no additional greenhouse gas impacts would be anticipated under the proposed project.
- **Hazards and Hazardous Materials.** Hazardous waste materials are not accepted at the Active Recycling facility, however incidental hazardous waste may be found in the 300 TPD of additional curbside recyclables that will be processed at the facility. With implementation of the following operational measures potential impacts are less than significant:
 1. If inbound material contains prohibited material or hazardous material that is not detected at the time of delivery, then such material is separated, using procedures and methods to ensure employee safety, segregated by class, and manifested in accordance with federal and state regulations. Only employees with proper training will handle hazardous waste.
 2. All Active Recycling drivers using the site will attend a HazMat course to be able to identify hazardous materials in their collection routes to avoid picking them up.
 3. Active Recycling will implement an approved Hazardous Waste Load Checking Program as described in the facility’s Transfer Processing Report. Inbound loads are inspected prior to or during unloading to prevent the acceptance of waste which is prohibited by the facility. When load checking reveals the presence of hazardous liquid, special waste, or medical waste the material is rejected entirely.
 4. If an incoming load contains hazardous materials/waste, the vehicle shall be stopped and the material/waste contaminating the curbside recyclables load shall be separated, properly packed, labeled and shipped according to state regulations.
 5. All Active Recycling personnel conducting Hazardous Waste Load Checking will be trained and wear personal protective equipment according to CalOSHA standards for this activity.

¹ “Lean About Green Vehicles – Compressed Natural Gas” United States Environmental Protection Agency <https://www.epa.gov/greenvehicles/learn-about-green-vehicles-compressed-natural-gas#:~:text=CNG%20generally%20creates%20fewer%20smog,%2C%20processing%2C%20and%20distributing%20CNG>, accessed March 27, 2023.

6. A spill response kit will include absorbent material, brooms, shovels, 55-gallon drums, protective gloves, clothing, boots, goggles, and respiratory equipment.
7. Hazardous waste shall be kept in a special area which is restricted. This material is stored in a secure and safe area within a designated hazardous material locker as indicated in the facility's Transfer Processing Report.
8. A state-licensed environmental service company has been hired to be available 24 hours/7 days per week on an emergency basis to clean up any major spills and to haul all hazardous material to a permitted disposal site.
9. Records of load checks and the training of personnel in the recognition, proper handling, and disposition of prohibited waste, as well as a copy of the load checking program and copies of the load checking records for the prior year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.

No hazards or hazardous materials would result from replacing the scrap metal storage and processing with 300 TPD of curbside recyclables.

- **Hydrology and Water Quality.** Active Recycling is subject to the State Water Resource Control Board Industrial General Permit Order 2014-0057-DWQ as Amended in 2015 and 2018. As a recycling facility Active Recycling conducts stormwater sampling and reporting under the Stormwater Multiple Application and Report Tracking System (SMARTS). Active Recycling provides laboratory reporting of pH, total suspended solids, oil and grease, iron, lead, aluminum, zinc, and chemical oxygen demand. As with the Approved Project, compliance with the facility storm water pollution prevention plan, no impacts to hydrology or water quality would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
- **Land Use and Planning.** Active recycling operates under a Certificate of Occupancy which allows sorting and processing of mixed waste and recycling. As with the Approved Project, no land use impacts would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
- **Mineral Resources.** The project site has not historically been used for mineral resource extraction and is not currently used for mineral recovery. As with the Approved Project, no impacts to mineral resources would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
- **Noise.** The noise sources associated with processing curbside recyclables would be no greater than processing scrap metal which include inbound and outbound trucks, the tipping of material onto the ground, front-end loaders and forklifts with associated back up warning alarms, material processing, loadout of material into transfer trucks and the handling of metal bins and roll-offs boxes. Based on the noise levels associated with processing scrap metal, the proposed project would not increase ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, existing noise ordinances, or applicable

standards of other agencies. As part of the facility operations, phone numbers are posted at the facility entrance, in the event of any excessive noise levels. All employees and equipment operators are trained to minimize noise levels and all equipment meets OSHA requirements and is maintained to operate in a clean, quiet, and safe manner. As with the Approved Project, no noise impacts would result from the proposed waiver of street dedications and improvements, alley vacation, increased building size and increased solid waste facility permit area.

- **Population and Housing.** As with the Approved Project, no impacts to population and housing would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
- **Public Services.** As with the Approved Project, no impacts to public services would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
- **Recreation.** As with the Approved Project, no impact to recreational facilities would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
- **Traffic.** Scrap metal typically arrives at the facility in self-haul vehicles with an average payload of 1 ton and roll-off containers with an average payload of 10 tons. Using a 50/50 vehicle split, approximately 165 inbound vehicle trips are generated by the scrap metal operation. Replacing the 300 TPD of scrap metal with 300 TPD of curbside recyclables, which would be delivered by collection trucks with an average payload of 6 tons, would generate approximately 50 inbound trips and a reduction in total of 115 inbound vehicle trips per day. Outbound scrap metal, recyclables are all transported off site in transfer trucks with a capacity of approximately 23 tons so there will not be any change in outbound trips under the proposed project.

The proposed project will also result in a reduction in Vehicle Miles Traveled (VMT) by providing a local facility for neighborhood service recyclable material collection trucks to tip their loads and quickly get back on their collection routes.

As with the Approved Project, no traffic impacts would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.

- **Utilities and Service Systems.** As with the Approved Project, no impact on utilities and service systems would result from replacing the scrap metal storage pile with a pile of curbside recyclables.
- **Wildfire.** The Approved project is in an urbanized industrial area and is not subject to wildfire threats. No wildfire impacts would result from replacing the 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage.
- **Energy.** No energy impacts would result from replacing 300 TPD of scrap metal processing and storage with 300 TPD of curbside recyclables processing and storage. No new equipment

or increased equipment operation will be necessary to process curbside recyclables under the proposed project when compared to current operations processing scrap metal, and no additional energy use or impacts would be associated with processing curbside recyclables in lieu of scrap metal.

SECTION 5. CEQA DETERMINATION

Section 15164(a) of the CEQA Guidelines states the following:

The lead agency or a responsible agency shall prepare an addendum to a previously certified MND if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent MND have occurred.

The Revised Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects due to substantial project changes or a substantial change in circumstances beyond those evaluated in the 2017 MND. Furthermore, no new information has been discovered to indicate that the Revised Project would have one or more significant effects not discussed in the 2017 MND; that significant effects previously examined would be substantially more severe than shown in the 2017 MND; that mitigation measures or alternatives previously found not to be feasible would in fact be feasible; or that mitigation measures or alternatives which are considerably different from those analyzed in the 2017 MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative. Therefore, an Addendum was prepared to comply with CEQA. As the Lead Agency for the proposed Revised Project, the City of Los Angeles Local Enforcement Agency is issuing this Addendum in accordance with Section 15164 of the CEQA Guidelines.

Signature:



David Thompson, Program Manager
Local Enforcement Agency Program
Los Angeles Department of Building and
Safety

4/18/23

Date