ERRATA OF CLARIFICATIONS TO THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

DIRECT DISPOSAL LARGE VOLUME SOLID WASTE FACILITY PERMIT

City of Los Angeles
Local Enforcement Agency
Los Angeles Department of Building and Safety
Environmental Affairs Division

SCH. No. 2019079096

October 2021

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City of Los Angeles, Local Enforcement Agency
Los Angeles Department of Building and Safety, Environmental Affairs Division
Errata to the Final Initial Study/Final Initial Study/Mitigated Negative Declaration

The following document identifies errata of clarifications relative to the Direct Disposal Large Volume Solid Waste Facility Permit Initial Study/Mitigated Negative Declaration (IS/MND), reference State Clearinghouse No. 2019079096. This document compiles all new and prior clarifications and modifications made to both the Draft and Final IS/MND in response to written comments on the document and as a result of certain editorial decisions. This introduction section presents new text, but the remainder of the document shows previously published text from the Draft and Final versions of the IS/MND, along with revisions shown in ~~strike out~~ and underline. Revisions that were exclusively included in the Final IS/MND are shown in *italics*.

Following is a brief background of the document's history. On July 29, 2019, the Draft IS/MND was released for a 30-day public review and comment period; approximately six comment letters were received. Clarifications to the document were made and the Final IS/MND was released in August 2020 that included a "Clarifications and Modifications" section and responses to comments, although such responses are not required by CEQA for a negative declaration. Additional comment letters were received on the Final IS/MND from Blum Collins LLP (dated October 19, 2020) and Soil/Water/Air Protection Enterprise (SWAPE) (dated November 20, 2020), a consulting firm hired by Blum Collins LLP. The decision was made to respond to these comments, although, again, not required by CEQA, and provide additional clarifications in the document. As a result, this Errata IS/MND was prepared to compile in one place all document clarifications and modifications, along with accompanying additional information and responses to comments. This Errata IS/MND includes several appendices containing all comment letters, responses, and other information that have accumulated over time. For a list of all appendices and how they relate to prior versions of this document, refer to the table of contents just above.

None of the changes to the Direct Disposal Draft and Final IS/MND contained in this errata represent substantial revisions that would require recirculation of the environmental document, as described in State CEQA Guidelines 15073.5. That is, the revisions:

- Do not result in any new, avoidable significant environmental effects that require mitigation (see Section 3) (CEQA Guidelines 15073.5(b)(1));
- Do not alter the conclusions of the environmental analysis or effectiveness of the mitigation measures or change any mitigation measures (see Section 3) (CEQA Guidelines 15073.5(b)(2));
- Are added in response to written comments on the document (see Appendices B, E, F, G, J, and L) (CEQA Guidelines 15073.5(c)(2)); and
- Add new information that merely clarifies or makes insignificant modifications to the document (see, e.g., explanatory text boxes) (CEQA Guidelines 15073.5(c)(4)).

SECTION 1. PROJECT DESCRIPTION

This Initial Study/Mitigated Negative Declaration (IS/MND) was prepared by Clements Environmental on behalf of the lead agency, the City of Los Angeles Local Enforcement Agency (LEA), for a proposed Large Volume Solid Waste Facility Permit to operate a 500 ton per day (TPD) transfer/processing facility at 3720 Noakes Street in the City of Los Angeles.

1.1 Project Title

Direct Disposal Large Volume Solid Waste Transfer/Processing Facility

1.2 Lead Agency

City of Los Angeles Local Enforcement Agency, Los Angeles Department of Building and Safety, Environmental Affairs Division.

1.3 Primary Contact Person

José Gutiérrez, Environmental Supervisor 2
Local Enforcement Agency
Los Angeles Department of Building and Safety
Environmental Affairs Division
(213) 252-3348

1.4 Project Sponsor

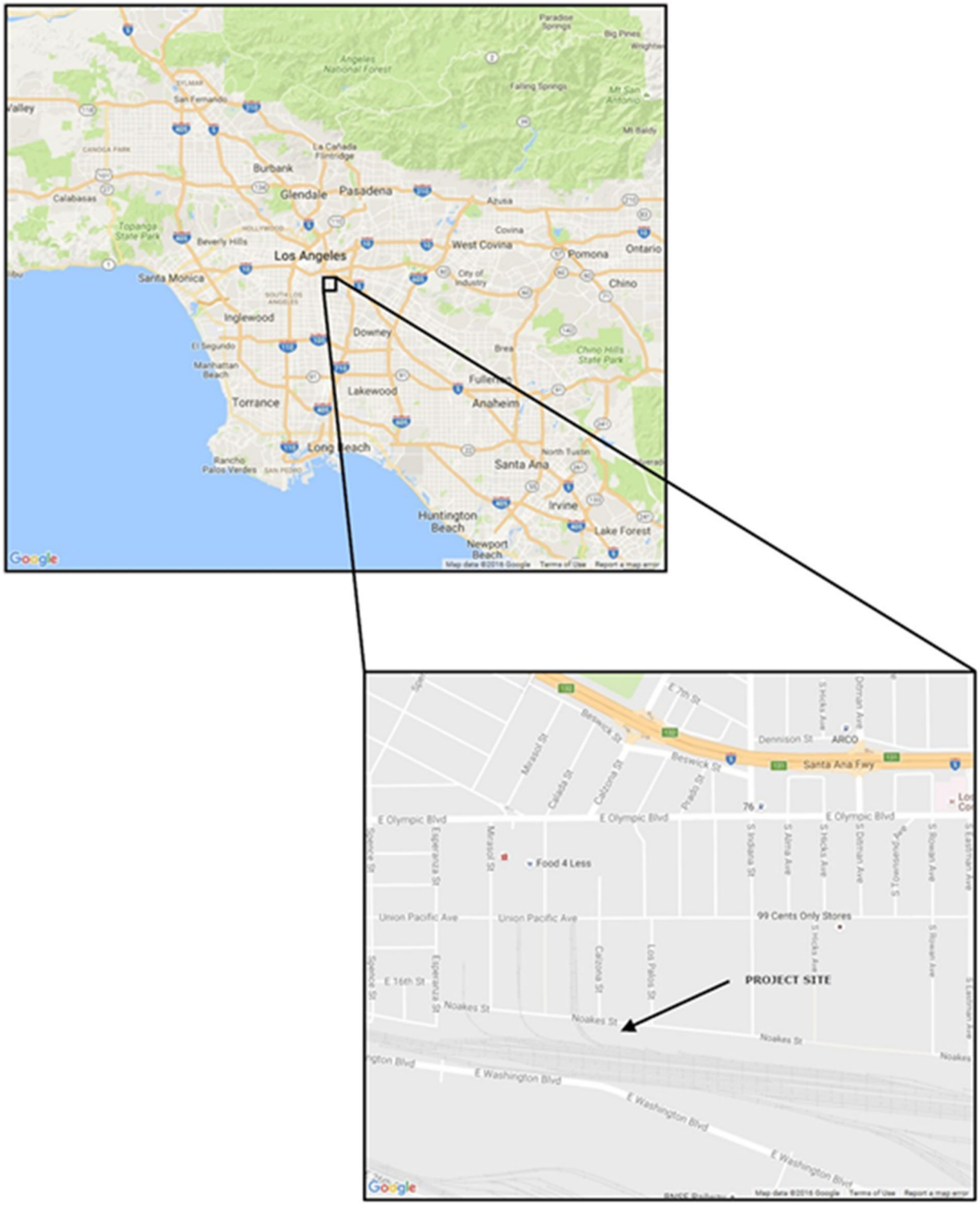
Direct Disposal, Inc.
3720 Noakes Street
Los Angeles, CA 90023
(323) 262-1604

1.5 Project Location

The project site is located at 3720 Noakes Street, Los Angeles, CA 90023 (see **Figure 1**, Vicinity Map).

The 5 (Santa Ana), 60 (Ponoma) and 710 (Long Beach) Freeways provide regional access to the project area with E. Olympic Boulevard, S. Indiana Street, E. 3rd Street, and S. Downey Road and S. Eastern Avenue providing local access to project area. Calzona Street, Los Palos Street and Noakes Street provide direct access to the project site and also provide access to the adjacent industrial and warehouse businesses.

FIGURE 1 - VICINITY MAP



1.6 Proposed Project

The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow expansion of the existing 175 ton per day (TPD) *Direct Disposal* Medium Volume ~~*Direct Disposal*~~ Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF) (reference CalRecycle SWFP no. 19-AR-1228), located at 3720 Noakes Street in the City of Los Angeles.[1] The new permit will allow the facility to accept up to 500 TPD of CDI material and municipal solid waste (MSW) for processing and transfer, no more than 100 TPD of which can be MSW.[2]

The 54,136 square foot project site is developed with a one-story, 12,200 square foot clear-span building that houses processing equipment including mechanical screens and an elevated, covered, sort line. A repair shop, truck scales, a 600-sf scale house, and outdoor storage areas also occupy the site. Off-site surface parking is provided at 3719 Noakes Street. **Figure 2**, Overall Site Plan and **Figure 3** Site Plan depict the project site. The site is fully enclosed by a minimum 8-foot tall solid perimeter fence. No new floor area is proposed as part of the project. The 3719 Noakes Street site is currently used for parking, and storage of roll-off containers. No solid waste is processed on the 3719 Noakes Street property.

Other improvements are proposed to increase operational efficiency and include opening new access doors on the east and west side of the building to improve vehicle circulation, material processing and material transfer, adding a low speed shredder for pre-processing incoming ~~*COD*~~ *C&D* material, adding screens, increasing bunker capacities and extending the sort line. A second truck scale may be added to the site as well.

Future improvements may also include ~~*a vehicle queuing lane, a truck scale, scale house and*~~ *relocation of the office trailer* ~~*offices at*~~ to the 3719 Noakes Street property which will free up additional space at 3720 Noakes Street for~~m~~ material storage and processing. *The 3719 Noakes Street site will not be used for customer queuing, or storage/processing of MSW.*

Incoming vehicles enter the site from Noakes Street through Gate #1, and proceed to the scale to weigh in. After weighing in, vehicles will:

1. Make a 180 degree turn and backup into Tipping Area #2 to unload; or,

2. Exit the site through Gate #1 and make a right turn onto Noakes Street and back into Tipping Area #1 through Door #1.

[1] A Solid Waste Facility Permit is required pursuant to Title 27, Division 2, Subdivision 1, Chapter 4, Subchapter 3, Articles 2, 3, and 3.1 of the California Code of Regulations (commencing with section 21570).
[2] All MSW and residual material must be removed from the facility within 48 hours of receipt and/or processing.

FIGURE 2 - OVERALL SITE PLAN

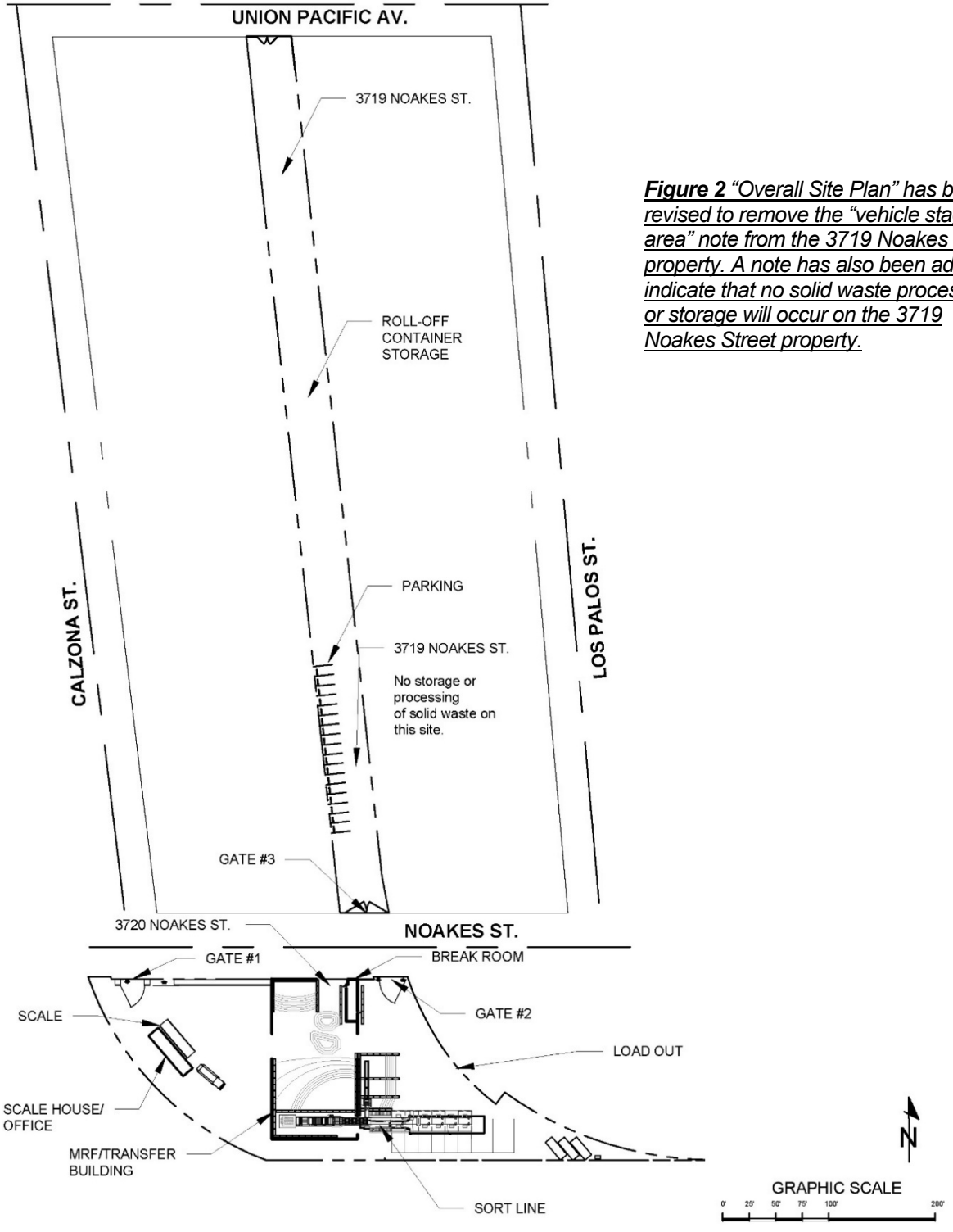


Figure 2 *"Overall Site Plan" has been revised to remove the "vehicle staging area" note from the 3719 Noakes Street property. A note has also been added to indicate that no solid waste processing or storage will occur on the 3719 Noakes Street property.*

FIGURE 3 - SITE PLAN

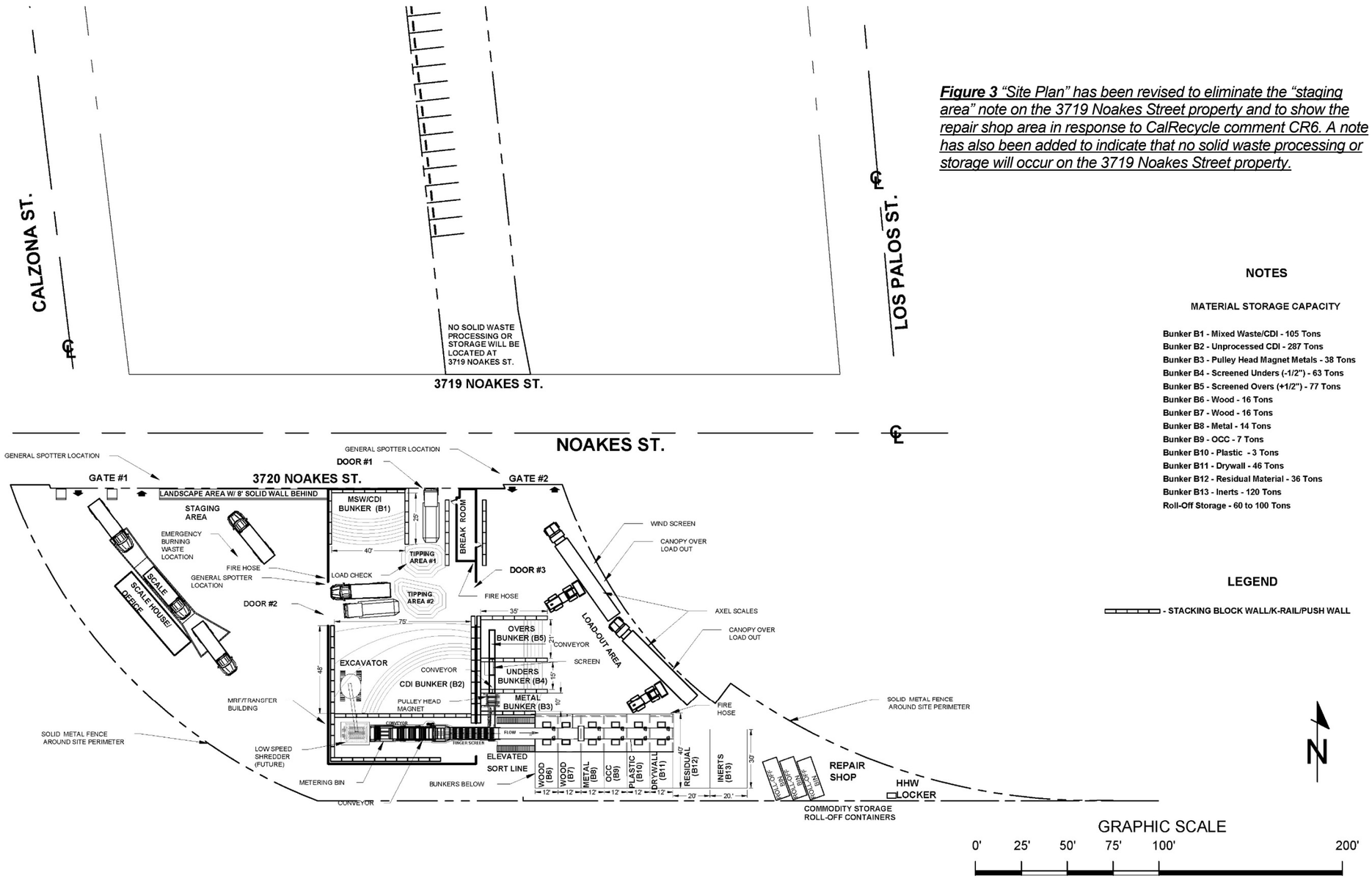


Figure 3 *"Site Plan" has been revised to eliminate the "staging area" note on the 3719 Noakes Street property and to show the repair shop area in response to CalRecycle comment CR6. A note has also been added to indicate that no solid waste processing or storage will occur on the 3719 Noakes Street property.*

NOTES

MATERIAL STORAGE CAPACITY

Bunker B1 - Mixed Waste/CDI - 105 Tons
Bunker B2 - Unprocessed CDI - 287 Tons
Bunker B3 - Pulley Head Magnet Metals - 38 Tons
Bunker B4 - Screened Unders (-1/2") - 63 Tons
Bunker B5 - Screened Overs (+1/2") - 77 Tons
Bunker B6 - Wood - 16 Tons
Bunker B7 - Wood - 16 Tons
Bunker B8 - Metal - 14 Tons
Bunker B9 - OCC - 7 Tons
Bunker B10 - Plastic - 3 Tons
Bunker B11 - Drywall - 46 Tons
Bunker B12 - Residual Material - 36 Tons
Bunker B13 - Inerts - 120 Tons
Roll-Off Storage - 60 to 100 Tons

LEGEND

- STACKING BLOCK WALL/K-RAIL/PUSH WALL

After unloading, vehicles with TARE weights on file may exit the facility without crossing the scale while vehicles without TARE weights will proceed back to the scale and then exit the site through Gate #1.

The property at 3719 Noakes Street may be accessed through Gate #3 and used to stage transfer trucks or customer vehicles. Spotters will guide traffic within the facility and on adjacent streets when necessary.

All outgoing recyclable materials and transfer trucks enter and exit the facility from Gate #2 located on the east side of the MRF/transfer building. Empty trucks back into the load-out area which can accommodate two trucks at a time. Axel scales will be used to maximize outgoing material loads. During waste receiving hours, facility personnel in the scale house monitor incoming traffic. During non-waste receiving hours, fences, walls, and gates secure the site at all entry and exit points.

The facility is currently permitted to operate 24 hours/day, seven days per week.

Included as **Appendix H** of this errata to the Draft and Final IS/MND is the Direct Disposal, Inc. Transfer/Processing Report (TPR) which provides details of the operation of the facility and shows the location of buildings, equipment, processing areas, tipping areas, material storage piles/bunkers, capacity calculations and circulation patterns. The TPR has been prepared in accordance with Title 14, Section ~~*18221*~~ *18221.6* of the California Code of Regulations (CCR), which lists the specific requirements for inclusion in a TPR.

The proposed application for a Large Volume SWFP is subject to the California Environmental Quality Act (CEQA). A SWFP is reviewed and approved by the City of Los Angeles Local Enforcement Agency (LEA) and the California Department of Resources, Recycling and Recovery (CalRecycle). The City of Los Angeles LEA is the designated Lead Agency for the proposed project and will be responsible for the project's environmental review. Section 21067 of California Public Resources Code defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment. As part of the proposed project's environmental review, the City LEA has authorized the preparation of this IS/MND. The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. The purpose of this IS/MND is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment.

1.7 General Plan and Zoning

The City of Los Angeles General Plan Land Use Map for the Boyle Heights Community Plan designates the project site heavy industrial with a corresponding zone of M3-1-CUGU (heavy industrial) (**Figure 4** and **Figure 5**).

FIGURE 4 - CITY-WIDE COMMUNITY PLAN MAP

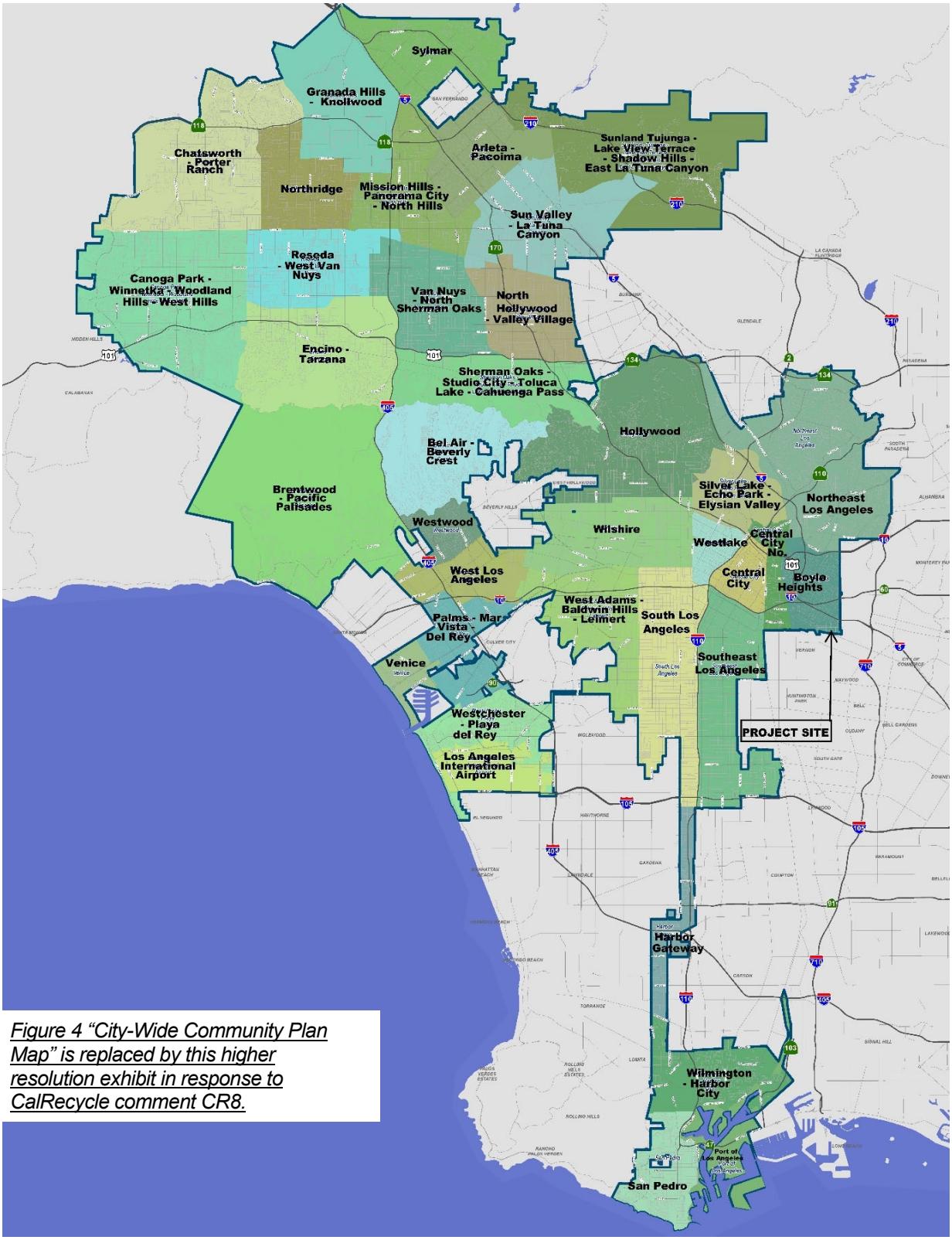


Figure 4 "City-Wide Community Plan Map" is replaced by this higher resolution exhibit in response to CalRecycle comment CR8.

FIGURE 5 - BOYLE HEIGHTS COMMUNITY PLAN MAP

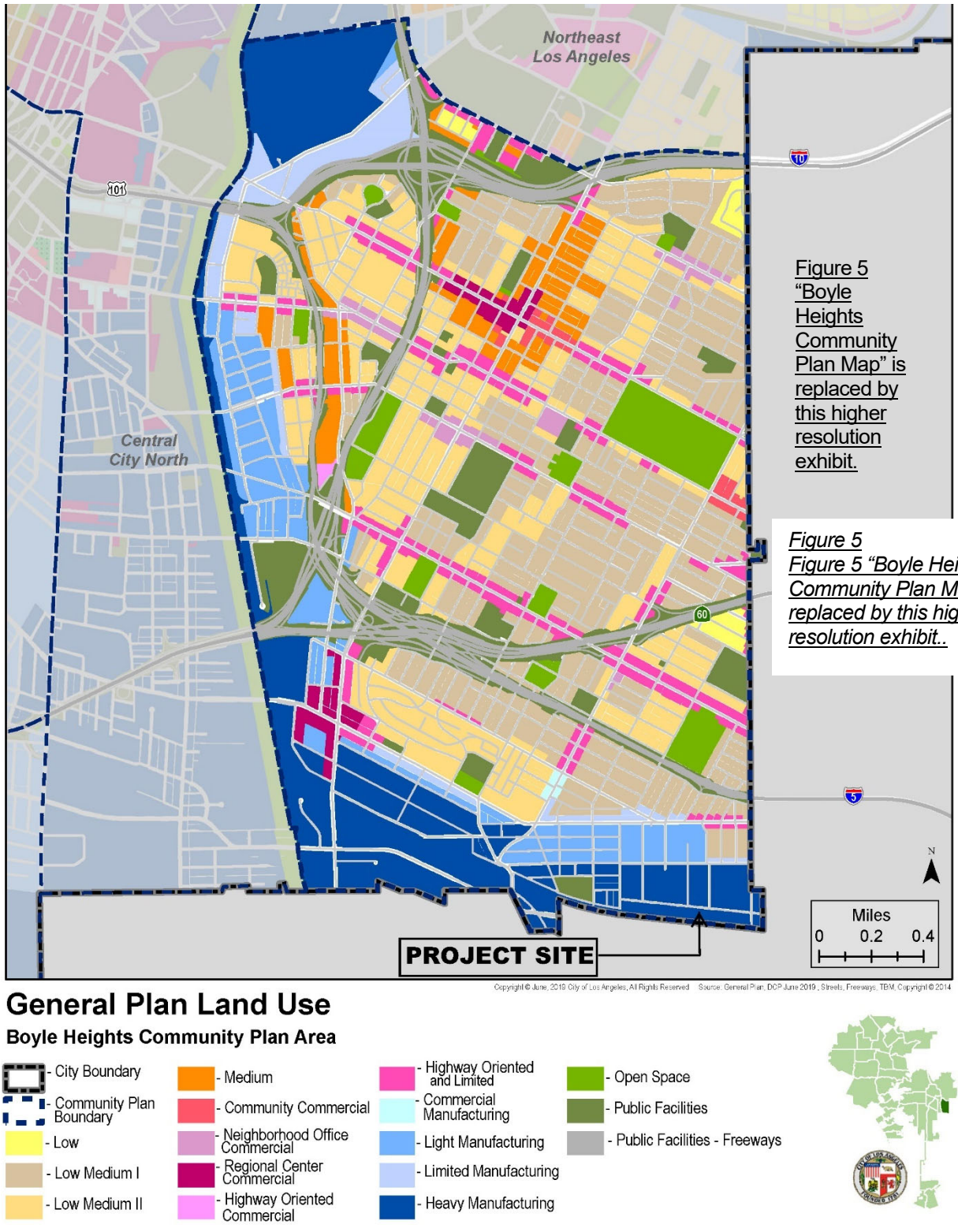


Figure 5 "Boyle Heights Community Plan Map" is replaced by this higher resolution exhibit.

Figure 5
Figure 5 "Boyle Heights Community Plan Map" is replaced by this higher resolution exhibit..

The Direct Disposal site is zoned M3-1-1-CUGU under the City of Los Angeles municipal code as shown in **Figure 6** and the existing recycling materials sorting facility, outdoor storage and parking are permitted under Use of Land Permits 16016-20000-24736, 16020-20001-03077 and 16020-20001-03078.

Los Angeles Municipal Code (LAMC) Section12.21 A 18(e) states in part that Recycling Materials Sorting Facilities shall be permitted in the M3 Zone without obtaining a conditional use permit provided that:

- The facility shall be located at least 1,000 feet from an A, R, C, P, or PB Zoned property.

The Direct Disposal Recycling Material Recovery Facility and Transfer Station building is not located within 1,000 feet of an A, R, C, P, or PB Zoned property located in the City of LA or the City of Vernon as shown in **Figure 5**. Direct Disposal has been operating a CDI processing facility at the project location since 2004. *[This paragraph was originally a bullet point in the draft IS/MND].*

1.8 Background

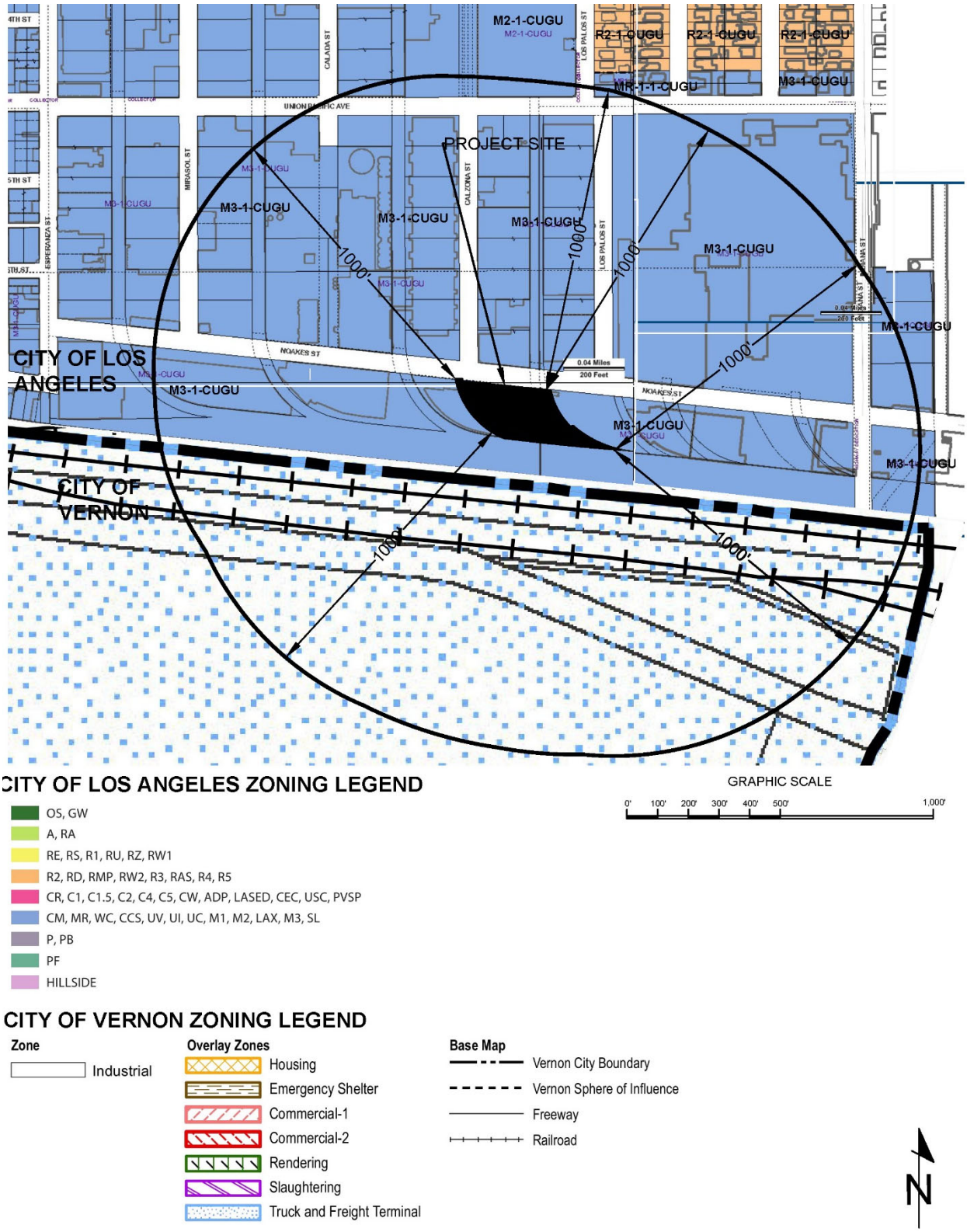
Section 1.8 "Background" is revised as follows: Direct Disposal, Inc. has been operating a CDI processing facility at the project location for over 14 years (since 2004) and has operated a medium volume ~~*solid waste*~~ *CDI* ~~*processing and transfer*~~ material recovery facility since 2008 under SWFP 19-AR-1228, processing up to 175 TPD of material.

1.9 Purpose

Pursuant to the CEQA Guidelines, additional purposes of this IS/MND include the following:

- To facilitate the project's environmental assessment early in the design and development of the proposed project;
- To eliminate unnecessary Environmental Impact Reports (EIRs);
- To determine the nature and extent of any impacts associated with the proposed project; and,
- To provide the City LEA and CalRecycle with information to use as the basis for deciding if the proposed mitigation measures are adequate to reduce the project's potential environmental impacts to less than significant levels.

FIGURE 6 - ZONING AND 1,000 FOOT RADIUS MAP



The California Environmental Quality Act (CEQA), as established by statute (Public Resources Code§§ 21000 et seq.), requires that the environmental implications of an action by a local agency be estimated and evaluated before project approval. This IS/MND has been prepared in accordance with Section 15063 of CEQA Guidelines (14 Cal. Code Reg. 1500 et seq.) and provides the assessment for a determination of whether the project may have a significant effect on the environment.

The following documents are included as appendices and made part of this environmental analysis:

1. **Mitigation Monitoring and Reporting Program-** has been prepared to ensure that mitigation measures identified in the Initial Study/Mitigated Negative Declaration are implemented in an effective and timely manner, and that identified impacts are avoided or mitigated to a level of insignificance.

2. **Transfer/Processing Report** - includes a detailed description of the operation and how the facility will comply with its Solid Waste Facility Permit. The capacity study is part of the Transfer/Processing Report which includes volumetric capacity calculations of all material storage piles.

1.10 Environmental Setting

The project site is located in an urbanized, heavy industrial setting. All immediately adjacent properties are zoned M3-1-CUGU. A mill, garment manufacturing facility, and a warehouse occupy the north side of the CDI facility across Noakes Street. A printing facility occupies the property to the east. A vacant strip of land owned by the Union Pacific Railway is situated at the south side of the facility bordering the City of Vernon. Union Pacific Railway is situated further south within the City of Vernon. A wholesale distribution warehouse occupies the west side of the CDI facility.

Noakes Street, fronting the property, is a 62 feet wide, fully developed local street, serving heavy industrial uses. Los Palos Street and Calzona Street are the closest intersecting streets, which are developed for heavy industrial use.

1.11 Other Agencies Whose Approvals are Required

The proposed project will require issuance of Large Volume Solid Waste Facility Permit from the Local Enforcement Agency in conjunction with the California Department of Resource Recycling and Recovery (CalRecycle).

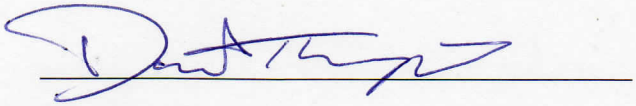
FINDINGS: The environmental analysis provided in the attached IS/MND indicates that the proposed project will not result in any significant impacts. For this reason, the City of Los Angeles Local Enforcement Agency determined that a IS/MND is the appropriate CEQA document for the proposed project. The following findings may be made based on the analysis contained in the attached Initial Study:

The proposed project *will not* have the potential to degrade the quality of the environment.

The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.

The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the City.

The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.



12/2/21

Signature
David Thompson, REHS
Local Enforcement Agency Program Manager
Los Angeles Department of Building and Safety
Environmental Affairs Division

Date

SECTION 2. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

~~**Environmental Factors Potentially Affected:**~~ (This corrects a section numbering issue.)

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is ~~a~~ "Potentially Significant Impact *Unless Mitigation Incorporated*" ~~*Impact*~~ as indicated by the checklist on the following page*s*.

[ ] Aesthetics	[ ] Agriculture and Forestry Resources	[X] Air Quality
[ ] Biological Resources	[ ] Cultural Resources	[ ] Geology/Soils
[ ] Greenhouse Gas Emissions	[X] Hazards and Hazardous Materials	[X] Hydrology/Water Quality
[ ] Land Use Planning	[ ] Mineral Resources	[X] Noise
[ ] Population/Housing	[X] Public Services	[ ] Recreation
[ ] Transportation/Traffic	[X] Utilities/Service Systems	[ ] Mandatory Findings of Significance

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

[X] I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

[ ] I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature

12/2/2021
Date

David Thompson, REHS
Printed Name

SECTION 3. CEQA ENVIRONMENTAL CHECKLIST

This section was incorrectly identified as Section 2 in the Draft IS/MND.

The Environmental Checklist and discussion of potential environmental effects were completed in accordance with Section 15063(d)3 of the California Environmental Quality Act Guidelines to determine if the proposed project may have any significant impacts on the environment. A brief explanation is provided for all determinations. A "No Impact" or "Less Than Significant Impact" determination is made when the project will not have any impact or will not have a significant effect on the environment for that issue area, respectively, based on a project-specific analysis.

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document

pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

a) The significance criteria or threshold, if any, used to evaluate each question; and

b) The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.1 AESTHETICS Would the project:				
a. Have a substantial adverse effect on a scenic vista?				X

The site is located in an industrial, urbanized setting and developed with a one-story warehouse building that is currently used as a CDI processing facility. Operations are screened from view by solid perimeter fencing and the Material Recovery Facility and transfer station building. The proposed project will not result in any change to the view-scape, and no scenic vistas will be adversely impacted.

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

The proposed project will not entail demolition of any structures or result in any damage or impacts to scenic resources, historic buildings or scenic highways as there are none on the project site or in the immediate project vicinity.

c. Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features??				X

The proposed project does not entail any new construction. The project site is located in an industrial, urbanized, setting and the proposed project will not result in any significant changes or adverse impacts to the visual character of the area.

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

The project site is currently developed, and includes exterior lighting to provide security and allow nighttime operations. The proposed project would not result in a substantial increase in nighttime lighting in the project vicinity beyond the current levels which are associated with ongoing operations in the adjacent rail yard as well as from security lighting associated with surrounding industrial and warehouse uses.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.2 AGRICULTURE AND FORESTRY RESOURCES Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X

The site is zoned for industrial uses and does not contain farmland of any kind. No impact to farmland will result from the proposed project.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X

The site is zoned for industrial uses and does not contain farmland of any kind. The project will not have any impacts on agricultural uses or a Williamson Act contract preserve.

c Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?				X

There is no forest or timberland zoned for timberland production in the project area, and the proposed project will therefore not conflict with existing zoning for, or cause rezoning of, forest land or timberland zoned Timberland Production.

d. Result in the loss of forest land or conversion of forest land to non-forest use?				X

No forest lands or open space areas are located in the project vicinity. In addition, there are no areas zoned for forest land preservation in the project vicinity. Therefore, no impacts on forest land or timber resources will result from implementation of the proposed project.

e. Involve other changes in the existing environment that, due to their location or nature, may result in conversion of farmland to non-agricultural use?				X

No agricultural activities or farmland uses are located within the project area. The proposed project will not involve the conversion of any existing farmland area to urban uses and, as a result, no impacts will result from implementation of the proposed project.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.3 AIR QUALITY Would the project:				
a. Conflict with or obstruct implementation of the SCAQMD's air quality and congestion management plan?				X

The project site is located in the South Coast Air Basin which is managed by the South Coast Air Quality Management District (SCAQMD) and covers a 6,600 square-mile area within Orange County, the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. The SCAQMD is required, pursuant to the Clean Air Act of 1988, to reduce emissions of criteria pollutants for which the basin is in non-attainment. Strategies to achieve these emissions reductions are included in the SCAQMD's Air Quality Management Plan (AQMP) for the region. The Final 2012 AQMP was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG), and takes into account population projections for communities within the basin. Two consistency criteria that should be referred to in determining a project's conformity with the AQMP are identified in Chapter 12 of the AQMP and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. *Consistency Criteria 1* refers to a project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or a contribution to the continuation of an existing air quality violation. *Consistency Criteria 2* refers to a project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.

Regarding "Consistency Criteria 1", the proposed project will not result in an increase in the frequency or severity of an existing air quality violation or a contribution to the continuation of an existing air quality violation because collection trucks, which are and will be the primary vehicles using the facility, are required to comply with the California Air Resources Board solid waste collection vehicle (SWCV) rule which was adopted by the in 2004. This rule applies to all SWCV diesel vehicles more than 14,000 pounds in weight with engines more than 7 years old (before 2006) that collect waste for a fee. All vehicles subject to the SWCV rule are required to reduce smoke from 100% of tier 1 engines and 60% of tier 2 engines. Eventually all of the collection vehicles involved in commercial solid waste collection will use compressed natural gas (CNG), thus meeting these requirements. In addition, diesel fueled transfer trucks and off-road equipment used as part of the facility operation are also subject to increased emission controls and regulations as older engines are phased out and replaced with newer models.

Regarding "Consistency Criteria 2", The proposed project will not result in any significant adverse impacts related to the implementation of the AQMP as the project will not adversely affect any regional population, housing, and employment projections prepared for the City by SCAG. The project will add approximately 28 second shift of employees. According to SCAG, in 2008, the City of Los Angeles had a permanent population of 3,770,500 persons, 1,309,900 households, and employment for 1,735,200 persons. SCAG forecasts, in their 2012 Regional Transportation Plan (adopted April 2012), that by 2020, the City will have a total population of 3,991,700 persons (an increase of 5.9 percent from 2008), 1,455,700 households (an increase of 10.1 percent), and will provide employment for 1,817,700 persons (an increase of 4.3 percent). The local jobs created by the project will be considered a benefit to the local community. As a result, the proposed project would not be in conflict with, or result in an obstruction of, the applicable 2007 AQMP.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X[3]	~~X~~	

During operation of the CDI processing facility, dust and particulate emissions from material processing, mobile equipment and diesel-powered vehicles may adversely affect air quality.

The proposed project will increase the number of vehicles using the facility as well as the running times for off-road diesel-powered equipment used to process material at the facility. As shown in the ***Table 1*** *below, and reviewed by Yorke Engineering, LLC (See* ***Appendix F****) operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NOx, CO, PM10, and PM2.5. York Engineering in fact found that the NOx emissions in* ***Table 1*** *were overestimated by approximately 3.3 pounds per day. Therefore, the proposed project's operational impacts on regional air quality are considered less than significant.*

TABLE 1 – PROJECT OPERATIONAL EMISSIONS

	Project Emissions (pounds per day)								
	VOC	NOx	CO	SOx	PM10	PM 2.5	CO2	CH4	CO2E
EMISSION SOURCE									
Material Tipping/Loading	0	0	0	0	1.80	0.27	0	0	0
2 Excavators	1.6126	8.8924	11.2728	0.0286	0.4048	0.401157	2640	0.1452	5335
3 Loaders	1.8072	11.3928	10.5744	0.0288	0.564	0.5589	2616	0.1632	6054
1 Telehandler	1.0164	7.15	4.9445	0.0165	0.2772	0.274705	1551	0.0913	3702
1- Skid Steer Loader	0.2442	1.77548	2.3375	0.0044	0.055	0.054505	333.3	0.022	871
Onsite Circulation Fugitive Dust	0	0	0	0	19.344	4.080	0	0	0
Area	1.2069	0.00005	0.00555	0	0.00002	0.00002	0.0118	0.00003	0.0126
Energy	0.0289	0.2625	0.2205	0.00158	0.0200	0.0200	315.036	0.00604	316.9084
On-Road Mobile Emission	1.1409	25.0742	10.5071	0.0949	4.4758	1.3947	9,946.1609	0.3868	9955.8304
TOTAL EMISSIONS	**7.0571**	**54.54743**	**39.86235**	**0.17478**	**26.94082**	**7.053987**	**17,401.5087**	**0.81457**	**26234.7514**
Regional Threshold	55	55	550	150	150	55	-	-	-
SCAQMD Threshold Exceeded	NO	NO	NO	NO	NO	NO	-	-	-
Localized Significance Threshold	-	106	2,406	-	70	17	-	-	-
Localized Threshold Exceeded		NO	NO		NO	NO	-	-	-

Localized Significance Threshold analysis based on 1-acre site with 200-meter distance to receptor in Central LA source receptor area based on CalEEMod 2016 3.2 model runs - Winter.

[3] All changes made to impact classifications in the checklist tables are to correct prior errors in classification as a result of scrivener error. The corrections align the checklist tables with the impact conclusions that have been consistently and accurately described in discussion sections in the Draft and Final versions of the document. These corrections were made, in part, in response to comments (see Appendix B).

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

In addition to regional thresholds, the SCAQMD has developed specific CEQA Local Significance Thresholds (LSTs) to assess operational air quality impacts associated with individual development projects. The LST values are specific to the source reduction area in which the individual project is located and based on proximity to the nearest sensitive receptor(s). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. As shown in ***Appendix F*** *Estimated Daily Operational Emissions – operational emissions would not exceed LSTs significance thresholds for NOx, CO, PM10, and PM2.5 emissions. Therefore, the proposed project's operational impacts on LSTs are considered less than significant.*

Potential impacts from dust will be mitigated to a level of insignificance by the following mitigation measures:

AQ1. All incoming material shall be tipped inside the building during periods when wind speeds are greater than 15 miles per hour (mph) averaged over a 15-minute period, or when instantaneous wind speeds exceed 25 mph. Fencing, tarping, watering, misting, wind screens and other appropriate means will also be used to prevent liter and dust from blowing around outdoor tipping and storage areas.

AQ2. Hoses are available for employees to lay down a mist of water over any dusty material during loading and unloading activities. The water is absorbed into the material and does not run off site.

AQ3. Open-top trailers in a top-loading configuration are required to cover or otherwise protect the load within 15 minutes after loading.

AQ4. Regular sweeping shall be used to clean the maneuvering area, and around the perimeter of the facility.

The SCAQMD has prepared a table of mitigation measures for on-road engines. The list of mitigation measures for on-road engines is primarily intended to reduce particulate matter emissions. The following mitigation measures are proposed to reduce NOX, VOC and diesel particulate emissions:

AQ5. Maintain off-road as well as on-road diesel-fueled collection trucks in tune with the manufacturer's specifications.

AQ6. Trucks shall not be permitted to idle for more than five minutes during loading or unloading activities.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the Air Basin is non-attainment (ozone, carbon monoxide, and PM10) under an applicable federal or state ambient air quality standard?				X

The project will not increase any criteria pollutant above the significance thresholds and there will be no significant impacts.

d. Expose sensitive receptors to substantial pollutant concentrations?				X

SCAQMD published and adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[4] SCAQMD recommends that HRAs be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units).

The site is over 1,000 feet from residences and the nearest sensitive receptors as shown in **Figure 7.** As shown in **Table 2** on page 39, a total of approximately 109 additional truck trips are anticipated to result from the proposed project as follows: 58 roll-off trucks which are fueled by both diesel and Compressed Natural Gas (CNG), 15 transfer trucks which are all diesel fueled and 36 self-haul vehicles which are a mix of diesel and gas fueled trucks. The main source of toxic air contaminants (TACs) is from heavy duty diesel (HD) trucks. HD trucks release diesel particulate matter (DPM) that is regulated as a carcinogen. DPM is not regulated for any short-term (acute) non-cancer health effects.

The project is not a warehouse distribution facility, or a truck stop and would not generate over 100 new diesel truck trips per day given that a large percentage of the vehicles using the facility are CNG and gas fueled. While the project does not meet the SCAQMD criteria, a screening level health risk assessment (HRA) has been prepared for the project and is included in **Appendix G**. The HRA conservatively estimated 109 heavy duty (HD) diesel fueled trucks per day using the facility. The results of the screening level HRA indicate that the maximum cancer risk score would be 0.46 within 100 meters (328 feet) of the project site and that the cancer risk score at the nearest homes located 1,075 feet to the North is estimated to be 0.02. A cancer risk below 1 indicates a low level of public risk. These results indicate that exposure to toxic emissions from the Facility would not lead to significant public health risks.

[4] SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

FIGURE 7 - SENSITIVE RECEPTORS LOCATION MAP

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Create objectionable odors affecting a substantial number of people.		X		~~X~~

Environmental impacts may result due to the presence of odors in municipal solid waste material.

Potential impacts will be mitigated to a level of insignificance by implementation of an Alternative Odor Management Plan (AOMP). The AOMP will be submitted by Active Recycling for review and approval by the Local Enforcement Agency in accordance with the requirements of SCAQMD Rule 410.

Implementation of the AOMP, as well as the following mitigation measures, will reduce the impact of objectionable odors to a less than significant level.

AQ7. All incoming loads are checked for excessive odor. Loads may be rejected at the scalehouse or, if accepted, transferred out as soon as possible.

AQ8. 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.

AQ9. A misting system over tipping and transfer/load-out areas, as needed, will be used to control potential odors as well as dust emissions.

AQ10. All MSW~~*, greenwaste and organic material*~~ received at the facility will be transferred out within 48 hours and within 24 hours if possible. Material will be processed on a first in, first out, basis.

AQ11. Regular site inspections will be conducted by site supervisor(s) to assure that all ~~*organic matter*~~ *MSW* is removed as required, the facility is cleaned on a daily basis and to minimize any other source for odors on site.

AQ12. The receiving/transfer area, where residue from waste transfer, recycling or material recovery operations can accumulate, will be swept and cleaned throughout the day.

AQ13. The facility shall implement the Alternative Odor Management Plan contained in the TPR included as **Appendix B**. Should all efforts to mitigate odor complaints fail, the facility may need to provide rapid opening/closing doors and a negative pressure air system.

AQ14. Should odor complaints go unabated, limits on the types of waste materials accepted or a reduction in the amount of incoming tonnage may be specified by the LEA.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.4 BIOLOGICAL RESOURCES **Would the project:**				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X

No habitat for sensitive species exists on site. Areas of the site that are not developed with buildings or equipment are paved. No biological impacts are anticipated from the proposed project as the area proposed for development is currently paved and improved.

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?				X

There is no riparian habitat or other sensitive natural community located on the project site or in the project site or in the project vicinity that could be impacted by the proposed project.

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?				X

No impact to wetlands would occur as a result of the project.

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?				X

As there are not any migratory wildlife corridors on or near the site, the proposed project would not result in any impacts to the movements of fish or wildlife species.

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

No trees or biological resources exist on the site and no impacts to those resources would result from the proposed project.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	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?				X

The proposed project would not conflict with the provisions of adopted conservation plans and no impacts to any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan would occur.

3.5 CULTURAL RESOURCES

Would the project:

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

The project site does not contain and is not expected to adversely impact a historical resource as defined in the State of California's CEQA Statutes.

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

No impacts to archaeological resources would occur as a result of the proposed project as the site is developed and no subsurface excavations or new construction is proposed as part of this project.

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

No impacts to paleontological resources would occur as a result of the proposed project as the site is developed and no subsurface excavations or new construction is proposed.

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

The project does not have the potential to disturb human remains as no subsurface excavations or new construction is proposed as part of the proposed project.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.6 GEOLOGY AND SOILS **Would the project:**				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X

The project site area is not located within a fault or surface rupture zone as shown in **Figure 8**. The closest active faults and Alquist-Priolo Earthquake Fault Zones are approximately 7 to 8 miles from the project site. The proposed project will not result in increased impacts related to risk of loss, injury or death involving seismic activity.

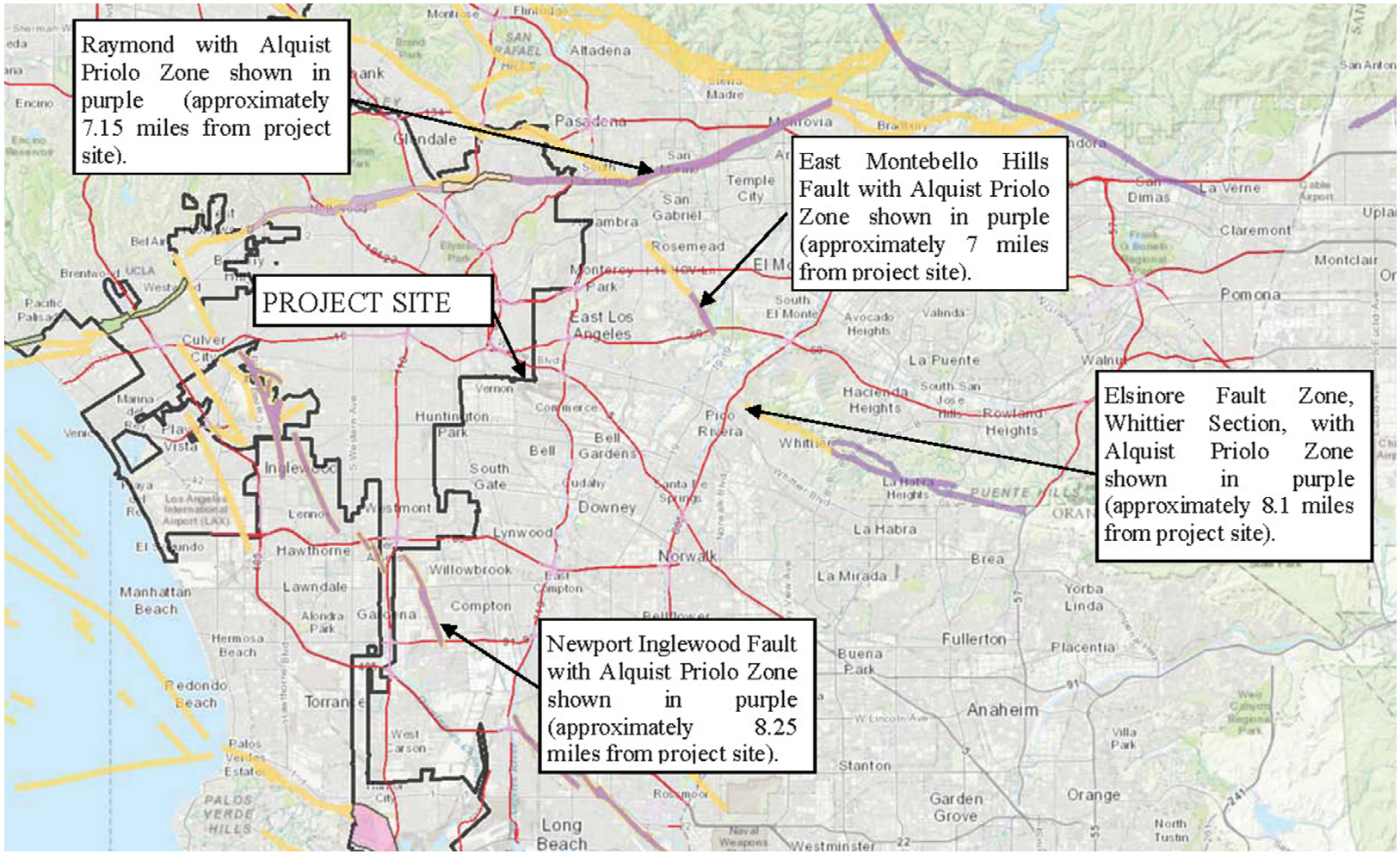
b. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?			X	

The subject site is within approximately 10 miles from the Newport-Inglewood Fault zone and the safety of site users may be affected by this seismic activity. This potential impact will be less than significant as no new construction is proposed.

c. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?				X

The entire site is paved and no buildings or construction is proposed. Therefore, seismic-related ground failure, including liquefaction should not be an issue.

FIGURE 8 - FAULT ZONES AND SURFACE RUPTURE MAP



	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				X

The site is not within a landslide area and no impacts to people or structures are anticipated.

e. Result in substantial soil erosion or the loss of topsoil?				X

Operations at the site will not result in substantial soil erosion or the loss of topsoil as the facility is completely paved.

f. 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?				X

This operation would not be located on a geologic unit or soil that is unstable and no impacts are anticipated as there no new construction proposed.

g. 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?				X

The proposed project would not be adversely impacted by expansive soils as no new construction is proposed.

h. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X

As no septic tanks or alternative wastewater disposal systems are proposed, there are no impacts related to any limitations of such systems related to inadequate soils.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

3.7 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Hazardous waste is not accepted at the Direct Disposal Transfer/Processing Facility; however, incidental hazardous waste may be found in the loads of material handled at the facility.

These impacts can be mitigated to a level of insignificance by the following measures:

HHM1. 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.

HHM2. All drivers will attend a HazMat course to be able to identify hazardous materials in their collection routes to avoid picking them up.

HHM3. Direct Disposal MRF and Transfer Station will implement an approved Hazardous Waste Load Checking Program as described in the 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.

HHM4. A spill response kit will include absorbent material, brooms, shovels, 55-gallon drums, protective gloves, clothing, boots, goggles and respiratory equipment.

HHM5. 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 CDI Processing Facility Report.

HHM6. 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.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	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?			X	

With implementation of HHM1 through HHM6, no impacts related to the release of hazardous materials is expected to occur.

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

The site is not located within one quarter mile of an existing or currently proposed school site and no hazardous or acutely hazardous emissions are associated with operation of the proposed facility.

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

The site is not located on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will not create a significant hazard to the public or the environment. This fact was verified on the Department of Toxic Substances Control, EnviroStor, Hazardous Waste and Substances Site List.

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

The project site is not located within an airport hazard land use area.

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

The project site is not located within the vicinity of a private airstrip.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X

The proposed project is located in a developed urban area with fully improved streets and would not interfere with the implementation of any emergency response or evacuation plans.

h. Expose people or structures to a significant risk of loss, injury or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wetlands?				X

The project is not located near any wildlands or wetlands and would not result in any impacts related to loss of those lands.

3.8 HYDROLOGY AND WATER QUALITY **Would the project:**

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

Stormwater falling on the waste material and running off the site could contain contamination which could create adverse impacts and violate water quality standards. The following mitigation measures will reduce potential impacts to water quality resulting from stormwater runoff to less than significant levels:

HWQ1. The facility will comply with the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

HWQ2. The facility will implement Best Management Practices (BMPs) contained in a Stormwater Pollution Prevention Plan (SWPPP) in order to minimize the potential for stormwater contamination from runoff.

HWQ3. Proposed non-structural BMPs include: 1) Turning away any leaking truck; 2) Regularly scheduled preventative maintenance of facility vehicles; 3) Use of absorbent material to soak-up spots of leaked fluids; 4) Implementing a litter control plan as contained in the Transfer/Processing Report; and 5) Regular cleaning of all areas.

HWQ4. The operator will implement and comply with a "Litter Control Program" as set forth in the facility Transfer and Processing Report. A cleanup crew will be assigned to keep the site, ingress and egress points, and adjacent streets and alleys, free of litter. A designated litter control team will patrol adjacent public streets and sidewalks at least two times per day.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?				X

The facility does not require the use of groundwater or result in the addition of impervious surfaces that would deplete groundwater supplies or interfere with groundwater recharge. No impacts to groundwater are anticipated as a result of project implementation.

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

The facility is completely paved and there will be no change to the onsite drainage pattern. There will be no alteration of any streams or rivers and there will not be any substantial erosion.

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

The facility is completely paved. The facility will not change the course of a stream or river or substantially increase the amount of surface runoff or result in flooding either off or on site.

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

The site of the facility and surrounding properties are developed, and the local stormwater facilities have been designed to convey runoff generated in the area in a safe and efficient manner without creating additional sources of pollution.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Otherwise substantially degrade water quality?		X		

Implementation of the Stormwater Pollution Prevention Plan referenced in 3.9.a will minimize degradation of water quality.

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

The facility is not located in a 100-year flood plain area. The project site is located in FEMA Zone X, which is an area determined to be outside the 0.2% annual chance floodplain.

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

The facility is not located in an area that would be subject to inundation due to failure of a levee or dam.

3.9 LAND USE AND PLANNING **Would the project:**

a. Physically divide an established community?				X

The facility is located in an industrial area and has been operating at the same location since November of 2004. The proposed project, therefore, does not have the potential to physically divide an established community.

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

The facility is classified as recycling material sorting use which is permitted "by-right" in the M3-1 heavy industrial zone per Los Angeles Municipal Code 12.21 A 17 I based on the fact that the site is located more than 1,000 feet from "A, R, C, P, or PB" zoned property. The proposed project would not conflict with any

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

land use plan, policy or regulation of an agency with jurisdiction over the site. The existing recycling materials sorting facility, outdoor storage and parking are permitted under Use of Land Permits 16016-20000-24736, 16020-20001-03077 and 16020-20001-03078. Transfer Stations are permitted by-right in the M3 zone.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

The site is currently developed with a CDI debris processing facility which does not conflict with any applicable habitat conservation or natural community conservation plans, and no impacts to adopted habitat or conservation plans are anticipated as a result of the proposed project.

3.10 MINERAL RESOURCES

Would the project:

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

The project will not result in the loss of a known mineral resource.

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?				X

The project will not result in the loss of a locally important mineral resource recovery site as delineated on the City General Plan.

3.11 NOISE

Would the project result in:

a. Exposure 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?		X		

The facility is located in an industrial area. Existing noise sources in the area surrounding the project site include automobile and truck traffic, trains, and surrounding industrial and manufacturing businesses.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

The main sources of noise include the tipping of material, mobile equipment such as loaders and excavators, and the handling of roll-offs boxes. The following mitigation measures will reduce noise impacts to less than significant levels:

N1 The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emissions or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

N2 Proper training will be provided to all employees to ensure facility operations are conducted in a manner that minimizes noise impacts.

N3 Hearing protection for personnel is provided to equipment operators and others subject to excessive noise levels from operations, in compliance with OSHA. Equipment meets OSHA requirements and is maintained to operate in a clean, quiet and safe manner.

b. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?				X

A substantial increase in ambient noise levels is not anticipated as a result of the proposed project.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project are to excessive noise levels?				X

The project is not located in an airport land use area.

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

The project is not located within the vicinity of a private air strip.

3.12 POPULATION AND HOUSING **Would the project:**

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

The increase in permitted tonnage will create approximately 5 new jobs; however, these new jobs will induce a less than significant population growth in the area as the facility hires people from the local community.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X

No housing will be displaced, as a result of the facility changes.

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

No people will be displaced due to the facility changes.

3.13 PUBLIC SERVICES

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

a. Fire protection?		<u>X</u>	~~X~~	

Impacts will be mitigated to a level of insignificance by the following measure:

PS1. Fire suppression equipment shall be continuously available and properly maintained.

PS2. Class ABC fire extinguishers shall be located throughout the facility to provide additional fire protection.

PS3. Emergency safety and spill equipment shall be inspected monthly and maintained as required.

PS4 Fire extinguishers shall be inspected once a month and recharged yearly by a contractor.

PS5. Fire hoses shall be located throughout the site.

b. Police protection?			X	

Impacts to police response are considered less than significant as this change at the site will not substantially increase the number of employees on site.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Schools?				X

The facility's increase in tonnage is an industrial use of the land and will not increase demand on schools.

d. Parks?				X

The facility's increase in tonnage is an industrial use of the land and will not increase demand on parks and recreation facilities.

e. Other public facilities?				X

The increase in tonnage will not impact any other public facilities.

3.14 RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X

The facility is an industrial use that will not impact parks or recreational areas/spaces.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X

The facility does not include recreational facilities, or require the construction or expansion of recreational facilities, that could have an adverse physical effect on the environment.

3.15 TRANSPORTATION/TRAFFIC **Would the project:**				
a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads or congestion at intersections)?			X	

The increase in permitted throughput from the 175 TPD to 500 TPD would generate an additional 274 daily vehicle trips (137 inbound and 137 outbound), a total of 14 AM peak hour trips (7 inbound and 7 outbound) and 10 PM peak hour trips (5 inbound and 5 outbound). No traffic impacts are anticipated as a result of the proposed increase in permitted tonnage and no traffic study is required based on the City of LA DOT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Guidelines which require preparation of a Technical Memorandum if a project will add between 25 to 42 a.m. or p.m. peak hour trips, and the adjacent intersections are presently estimated to be operating at LOS E or F. **Table 2** below was used as the basis for determining the daily as well as AM an PM peak hour project generated traffic.

TABLE 2 – PROJECT TRIP GENERATION ESTIMATES

Project Trip Generation Estimates

Land Use/Vehicle Type	Daily In	Daily Out	Daily Total	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
EXISTING CDI FACILITY (174 TPD)									
Employee Vehicles	26	26	52	0	0	0	0	0	0
Roll-Off Trucks	30	30	60	2	2	4	3	2	5
Self-Haul Vehicles	24	24	48	2	2	4	1	1	2
Transfer Trucks	8	8	16	1	1	2	0	0	0
Total	**88**	**88**	**176**	**5**	**5**	**10**	**4**	**3**	**7**
PROPOSED FACILITY EXPANSION (326 TPD)									
Employee Vehicles	28	28	56	0	0	0	0	0	0
Roll-Off Trucks	58	58	116	3	3	6	3	3	6
Self-Haul Vehicles	36	36	72	3	3	6	2	2	4
Transfer Trucks	15	15	30	1	1	2	0	0	0
Total	**137**	**137**	**274**	**7**	**7**	**14**	**5**	**5**	**10**
TOTAL SITE TRIP GENERATION (Proposed + Existing)									
Employee Vehicles	54	54	108	0	0	0	0	0	0
Roll-Off Trucks	88	88	176	5	5	10	6	5	11
Self-Haul Vehicles	60	60	120	5	5	10	3	3	6
Transfer Trucks	23	23	46	0	0	0	0	0	0
Total	**225**	**225**	**450**	**10**	**10**	**20**	**9**	**8**	**17**

Note:
Trip generation estimates provided by Direct Disposal, and is based on a typical operation.

LA DOT reviewed the proposed project and determined that it does not lend itself to analysis of VMT impacts and that an access and circulation study was not necessary.[5]

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

The facility will not exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

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

The facility will not result in a change in air traffic patterns and does not have the potential to create any adverse impacts to any airports.

[5] Email correspondence with Wes Pringle, P.E. Transportation Engineer, Metro Development Review 100 S. Main St, 9th Floor Los Angeles, CA 9001 dated November 12, 2019, November 18, 2019, November 25, 2019, November 26, 2019, March 5, 2020 and March 5, 2020.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X

There will be no increase in traffic hazard related to the facility's design and no change in customer circulation patterns. While the increased tonnage and additional waste streams will increase traffic levels in the area, the potential for increased traffic hazards due to design or circulation issues will be mitigated through the use of traffic spotters who will insure safe operating conditions for users of the facility.

e. Result in inadequate emergency access?				X

Operations at the facility fall under the jurisdiction of the Los Angeles Fire Department's CUPA program and associated periodic inspections which ensure adequate emergency access is provided and that materials are stored in a safe manner.

f. Result in inadequate parking capacity?				X

Parking will be provide as required by code.

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

This project does not and will not conflict with adopted policies, plans, or programs supporting alternative transportation. There will be no impact. There are no designated bike lanes adjacent to the project site.

3.16 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

This project would not exceed wastewater treatment requirements.

This project will not significantly change the amount of water consumption or wastewater discharge generated at the Project site. Therefore, the project would not result in an impact on the type of wastewater services currently provided to the facility site.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	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?				X

The project will not significantly change the amount of water consumption or wastewater discharge generated at the facility; therefore, the project would not require the construction or expansion of water or wastewater treatment facilities.

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?				X

The project will not create additional runoff because the facility site is currently 100% paved.

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

The City of Los Angeles has sufficient water supplies available to serve the facility and no additional entitlements are necessary.

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

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

The proposed project would increase the maximum daily tonnage from 175 TPD to *500* ~~*400*~~ TPD and the classification from a Medium Volume Construction and Demolition/Inert Debris Processing (CDI) facility to a Large Volume CDI facility. Facilities such as this divert material from the landfill through recycling.

g. Comply with federal, state, and local statutes and regulations related to solid waste?		*X*	~~*X*~~	

The facility will comply with federal, state, and local statutes and regulations related to solid waste with the implementation of the referenced mitigation measure.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Environmental impacts may result from project implementation due to the receiving of additional material at the facility. However, this potential impact will be mitigated to a level of insignificance by the following measure:

U1. A Large Volume Solid Waste Facility Permit shall be obtained from CalRecycle.

3.17. GREENHOUSE GAS EMISSIONS Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?			X	~~X~~

The State of California requires CEQA documents include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). The accumulation of GHG in the atmosphere regulates the earth's temperature.

The proposed project involves a request by Direct Disposal to increase the maximum daily permitted capacity from 174 TPD to 500 TPD. The proposed project will allow increased CDI~~, greenwaste and organics~~ processing within the project site and assist in the City's waste diversion objectives which will have a beneficial impact with respect to energy conservation and GHG reduction. Finally, the proposed project's operational emissions, and the use of internal combustion and natural gas-powered collection and processing vehicles, as shown in **Table 3** , will ~~result in GHG levels~~ generate approximately 2,900 metric tons per year of CO2E which is below the 10,000 metric ton CO2e threshold for industrial sources and below the SCAQMD's proposed threshold of 3,000 MT/year for general land use projects (2008) and would therefore not be ~~those~~ considered by the SCAQMD to represent a significant impact.[6] As a result, the impacts related to additional greenhouse gas emissions will be less than significant. It should also be noted that approximately 70 percent of the construction, demolition and inert (CDI) material processed at Direct Disposal is and will be diverted from disposal at landfills. At a permitted capacity of 500 TPD of CDI material, 350 TPD or 127,750 tons per year of drywall, metal, dimensional lumber and inert materials will be recycled which would mitigate approximately 143,000 MTCO2E of greenhouse gas emissions. As a result, the project is viewed as having net negative greenhouse gas emissions.[7]

[6] See Yorke Engineering, LLC Third-Party Review. Appendix ,F page 7 of 9.
[7] As calculated using EPA's Waste Reduction Model (WARM) version 15, a 72 percent diversion rate and landfilling all material as the baseline. WARM data is provided in Appendix J.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

TABLE 3 – GHG EMISSIONS

Operational Sources	CO_2	CH_4	N_2O	AR4 CO_2e	AR4 CO_2e
IS/MND Emissions (CalEEMod)	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(MT/yr)**
Area Emissions	0.0118	0.00003	—	0.0126	—
Energy Emissions	315.0363	0.00604	0.00578	316.9097	—
On-Road Mobile Emissions	9,946.1609	0.38680	—	9,955.8309	—
IS/MND CalEEMod Total	—	—	—	**10,273**	**1,701**
IS/MND Off-Road Total (Table 4 verification)	—	—	—	**7,134**	**1,181**
Project Operational Total	—	—	—	**17,407**	**2,882**

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			X	

The proposed project will further a number of the California Office of the Attorney General's recommended policies and measures that are designed to reduce GHG emissions. A list of the Attorney General's recommended measures and the project's conformance with each are indicated below. The proposed use will incorporate sustainable practices that include water, energy, and solid waste efficiency measures.

- Attorney General's Recommended Measure: Smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, incentives and fees, zoning, and public-private partnerships.

  Compliant. The use will preserve existing employment in addition to providing new opportunities improving the region's jobs housing balance.

  Percent Reduction. 10% to 20%

- Attorney General's Recommended Measure: Create transit, bicycle, and pedestrian connections through planning, funding, development requirements, incentives and regional cooperation; create disincentives for auto use.

  Compliant. The project will not adversely affect the future development of pedestrian or bicycle facilities along the Los Angeles River or adjacent public rights-of-way.

  Percent Reduction. 5%

- Attorney General's Recommended Measure: Energy- and water-efficient buildings and landscaping through ordinances, development fees, incentives, project timing, prioritization, and other implementing tools.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Compliant. The project will be consistent with the requirements of AB-1881 as it relates to irrigation and water conservation.

Percent Reduction. 10%

- Attorney General's Recommended Measure: Waste diversion, recycling, water efficiency, energy efficiency and energy recovery in cooperation with public services, districts and private entities.

  Compliant. The project will adhere to the use of sustainability practices involving the recycling and reduction solid waste. The project assists in both waste diversion and recycling

  Percent Reduction. 5%

- Attorney General's Recommended Measure: Regional cooperation to find cross-regional efficiencies in GHG reduction investments and to plan for regional transit, energy generation, and waste recovery facilities.

  Compliant. Refer to previous bullet points.

  Percent Reduction. NA

TOTAL GHG REDUCTION PERCENTAGE: 35 to 40%

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28 percent reduction in "business as usual" GHG emissions for the entire State. As the proposed project would reduce its GHG emissions by at least 35 percent as previously indicated, the potential GHG impacts are considered to be less than significant.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project 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?			X	

The project will not have a significant negative effect on the quality of the environment, the habitat of fish or wildlife species, or the plant or animal community.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	

Section 15355 of the CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." This section further states that cumulative effects may be changes resulting from a single project or a number of separate projects and that the cumulative impacts are those which may result from "closely related, past, present and reasonably foreseeable probable future projects" (Guidelines, Section 15355[b].

The additional wastestreams and increased tonnage will not result in environmental effects that are individually limited but cumulatively considerable with the implementation of proposed mitigation measures.

c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?			X	

The project will not result in environmental effects that will cause substantial adverse effects on human beings with the implementation of mitigation measures. The site is not located in an Environmental Justice Improvement Area as designated by the Los Angeles City Council. The site is located within an industrial area which has been zoned appropriately to encourage heavy manufacturing uses.

Mitigation measures included in this Mitigated Negative Declaration show that there are expected to be no impacts from the project that will not be mitigated to a less than significant level upon implementation of all proposed mitigation measures.

APPENDIX A

MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM: DIRECT DISPOSAL TRANSFER/PROCESSING FACILITY

Section 21081.6 of the Public Resources Code, enacted by passage of AB 3180 (Cortese Bill), requires public agencies approving projects with significant environmental impacts to adopt a Mitigation Monitoring and Reporting Program. The objective of the program is to ensure that mitigation measures adopted to avoid or mitigate potentially significant environmental impacts are implemented. Section 21081.6 of the Public Resources Code requires all state and local agencies establish monitoring and reporting programs whenever approval of a project relies upon a mitigated negative declaration or an environmental impact report (EIR). In accordance with these requirements, this mitigation monitoring and reporting program has been prepared to ensure that mitigation measures identified in the Initial Study/Mitigated Negative Declaration for the proposed Direct Disposal Solid Waste Transfer/Processing Facility, Los Angeles, California (or subsequent revisions thereto), are implemented in an effective and timely manner, and that identified impacts are avoided or mitigated to a level of insignificance. This plan identifies responsible parties for the mitigation program and includes a detailed discussion of monitoring and reporting procedures for each mitigation measure.

I. Responsible Party

Direct Disposal will be responsible for implementing and reporting mitigation measures in this program and will have responsibility for ensuring that mitigation measures are accomplished in an environmentally responsible manner. Direct Disposal will be responsible for ensuring that the status of mitigation measures is reported in accordance with this program and will be responsible for ensuring that the cost of mitigation is included in its budget, as appropriate. Mitigation measures will be included, if applicable, in any future operating agreements. Direct Disposal will be responsible for ensuring that applicable mitigation measures are carried forward in operational and maintenance procedures for this proposed expansion.

II. Mitigation Requirements

Based on the findings of the Initial Study, mitigation measures are not required for aesthetics, agriculture resources, biological resources, cultural resources, geology and soils, land use and planning, mineral resources, population and housing, recreation, transportation/traffic and utilities/service systems. Specific mitigation measures are required or otherwise included for air quality, hazards and hazardous materials, hydrology and water quality, noise, and utilities and services. Potentially significant impacts in these environmental resource areas will be avoided or minimized with implementation of thirty-three (33) specific mitigation measures summarized on Table A-1.

Category	Mitigation No	TABLE A-1 Mitigation Measure	Initial Study Section
Air Quality	AQ1	All incoming material shall be tipped inside the building during periods when wind speeds are greater than 15 miles per hour (mph) averaged over a 15-minute period or when instantaneous wind speeds exceed 25 mph. Fencing, tarping, watering, misting, wind screens and other appropriate means will also be used to prevent liter and dust from blowing around outdoor tipping and storage areas.	3.3.b
	AQ 2	Hoses are available for employees to lay down a mist of water over any dusty material during loading or unloading activities. The water is absorbed into the material and does not run off site.	3.3.b
	AQ 3	Open-top trailers in a top-loading configuration are required to cover or otherwise protect the load within 15 minutes after loading.	3.3.b
	AQ 4	Regular sweeping shall be used to clean the maneuvering area, and around the perimeter of the facility.	3.3.b
	AQ 5	Maintain off-road as well as on-road diesel-fueled collection trucks in tune with the manufacturer's specifications.	3.3.b
	AQ6	Trucks shall not be permitted to idle for more than five minutes during loading or unloading activities.	3.3.b
	AQ 7	All incoming loads are checked for excessive odors. Loads may be rejected at the scalehouse or, if accepted, transferred out as soon as possible.	3.3.e
	AQ 8	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.	3.3.e
	AQ 9	A misting system over tipping and transfer/load-out areas, as needed, will be used to control potential odors as well as dust emissions.	3.3.e
	AQ 10	All MSW~~, *greenwaste and organic material*~~ received at the facility will be transferred out within 48 hours and within 24 hours if possible. Material will be processed on a first in, first out, basis.	3.3.e

Category	Mitigation No	TABLE A-1 Mitigation Measure	Initial Study Section
Air Quality (Cont.)	AQ 11	Regular site inspections will be conducted by site supervisor(s) to assure that all ~~*organic matter*~~ MSW is removed as required, the facility is cleaned on a daily basis and to minimize any other source for odors on site.	3.3.e
	AQ 12	The receiving/transfer area, where residue from waste transfer, recycling or material recovery operations can accumulate, will be swept and cleaned throughout the day.	3.3.e
	AQ 13	The facility shall implement the Alternative Odor Management Plan contained in the TPR included as Appendix B. Should all efforts to mitigate odor complaints fail, the facility may need to provide rapid opening/closing doors and a negative pressure air system.	3.3.e
	AQ 14	Should odor complaints go unabated, limits on the types of waste materials accepted or a reduction in the amount of incoming tonnage may be specified by the LEA.	3.7.a
Hazards and Hazardous Materials	HHM1	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.	3.7.a
	HHM2	All drivers will attend a HazMat course to be able to identify hazardous materials in their collection routes to avoid picking them up.	3.7.a
	HHM3	Direct Disposal Transfer/Processing Facility will implement an approved Hazardous Waste Load Checking Program as described in the 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.	3.7.a
	HHM4	A spill response kit will include absorbent material, brooms, shovels, 55-gallon drums, protective gloves, clothing, boots, goggles and respiratory equipment.	3.7.a

Category	Mitigation No	TABLE A-1 Mitigation Measure	Initial Study Section
Hazards and Hazardous Materials (Cont.)	HHM5	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 TPR.	3.7.a
	HHM6	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.	3.7.a
Hydrology and Water Quality	HWQ1	The facility will comply with the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.	3.8.a
	HWQ2	The facility will implement Best Management Practices (BMPs) contained in a Stormwater Pollution Prevention Plan (SWPPP) in order to minimize the potential for stormwater contamination from runoff.	3.8.a
	HWQ3	Proposed non-structural BMPs include: 1) Turning away any leaking truck; 2) Regularly scheduled preventative maintenance of facility vehicles; 3) Use of absorbent material to soak-up spots of leaked fluids; 4) Implementing a litter control plan as contained in the Transfer/Processing Report; and 5) Regular cleaning of all areas.	3.8.a
	HWQ4	The operator will implement and comply with a "Litter Control Program" as set forth in the facility Transfer and Processing Report. A cleanup crew will be assigned to keep the site, ingress and egress points, and adjacent streets and alleys, free of litter. A designated litter control team will patrol adjacent public streets and sidewalks at least two times per day.	3.8.a
Noise	N1	The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emissions or creation of noise beyond certain levels at adjacent uses unless technically infeasible.	3.11.a

Category	Mitigation No	TABLE A-1 Mitigation Measure	Initial Study Section
Noise (Cont.)	N2	Proper training will be provided to all employees to ensure facility operations are conducted in a manner that minimizes noise impacts.	3.11.a
	N3	Hearing protection for personnel is provided to equipment operators and others subject to excessive noise levels from operations, in compliance with OSHA. Equipment meets OSHA requirements and is maintained to operate in a clean, quiet and safe manner.	3.11.a
Public Services	PS1	Fire suppression equipment shall be continuously available and properly maintained.	3.13.a
	PS2	Class ABC fire extinguishers shall be located throughout the facility to provide additional fire protection.	3.13.a
	PS3	Emergency safety and spill equipment shall be inspected monthly and maintained as required.	3.13.a
	PS4	Fire extinguishers shall be inspected once a month and recharged yearly by a contractor.	3.13.a
	PS5	Fire hoses shall be located throughout the site.	3.13.a
Utilities and Services	U1	A Large Volume Construction and Demolition / Inert Debris Processing permit shall be obtained from CalRecycle.	3.16.g

III. Schedule and Reporting Frequency

Table A-2 describes the method for executing the mitigation measure, organization responsible for implementing and funding the measure, estimated completion date for each measure, frequency of reporting, and significance after mitigation. Due to possible funding conditions and other external factors, facility construction and operation could be delayed. These delays may also affect the start and completion of mitigation measures.

It should be noted that although impacts to noise from the proposed project will not be considered significant, mitigation measures to reduce noise have been included as part of this Mitigation Monitoring and Reporting Program.

The monitoring and accomplishment of each mitigation measure will be documented on a Mitigation Monitoring Report form (see Exhibit A). This form will be filled out by the appropriate individual in the event of an inadvertent discovery of archaeological materials, paleontological materials, or human remains as described in Table A-2. Supplemental recordkeeping, report preparation and documentation will be required for some mitigation measures. The Mitigation Monitoring Report form will be filled out by the appropriate individual verifying that steps to prevent or minimize environmental degradation have been completed as described in Table A-2. Monitoring reports will be submitted to City of Los Angeles Department of Building and Safety and be available for inspection upon request. Completion of these forms will demonstrate and document compliance with Public Resources Code 21081.6.

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ1	All incoming material shall be tipped inside the building during periods when wind speeds are greater than 15 miles per hour (mph) averaged over a 15-minute period or when instantaneous wind speeds exceed 25 mph. Fencing, tarping, watering, misting, wind screens and other appropriate means will also be used to prevent liter and dust from blowing around outdoor tipping and storage areas.	The facility manager and scale house attendant shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by visually inspecting incoming and outgoing traffic.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ2	Hoses are available for employees to lay down a mist of water over any dusty material during loading or unloading activities. The water is absorbed into the material and does not run off site.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by properly training all staff.	Facility Operator	Ongoing	Broken and or clogged hoses will be noted in the special occurrences log book.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ3	Open-top trailers in a top-loading configuration are required to cover or otherwise protect the load within 15 minutes after loading.	The facility manager and scale house attendant shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by visually inspecting outgoing trailers.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ4	Regular sweeping shall be used to clean the maneuvering area, and around the perimeter of the facility.	The scale house attendant shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by visually inspecting incoming and outgoing loads.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ5	Maintain mobile equipment in tune with the manufacturer's specifications.	Maintenance shall be performed at the manufacturer's recommended intervals.	Facility Operator	Ongoing	Monthly	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ6	Trucks shall not be permitted to idle for more than five minutes during loading or unloading activities.	The facility manager and spotters shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by monitoring all queuing and tipping areas.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ7	All incoming loads are checked for excessive odor. Loads may be rejected at the scalehouse or, if accepted, transferred out as soon as possible.	The facility manager and scale house attendant shall be responsible for ~~insuring~~ ensuring that this mitigation measure is monitoring all incoming loads.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ8	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.	The facility manager and spotters shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by monitoring all tipping and storage areas for odiferous materials.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ9	A misting system over tipping and transfer/load-out areas, as needed, will be used to control potential odors as well as dust emissions.	The facility manager is responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by monitoring site conditions and deploying and using the overhead misting system as necessary.	Facility Operator	Ongoing	Daily. All misting systems shall be maintained in good operating condition and the LEA will be notified is the system is not working and/or repairs are required.	Less than significant
AQ10	All MSW~~, greenwaste and organic material~~ received at the facility will be transferred out within 48 hours and within 24 hours if possible. Material will be processed on a first in, first out, basis.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by monitoring when incoming MSW, greenwaste and organic waste is brought to the facility and when it need to be loaded out.	Facility Operator	Ongoing	If MSW, greenwaste or organic material can't be moved out within 48 hours as required, the LEA shall be notified.	Less than significant
AQ11	Regular site inspections will be conducted by site supervisor(s) to assure that all MSW ~~organic matter~~ is removed as required, the facility is cleaned on a daily basis and to minimize any other source for odors on site.	The facility manager is responsible for ensuring that housekeeping is being regularly conducted.	Facility Operator	Ongoing	High traffic areas as well as MSW, greenwaste and organics storage bunkers shall be cleaned on a daily basis.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ12	The receiving/transfer area, where residue from waste transfer, recycling or material recovery operations can accumulate, will be swept and cleaned throughout the day.	The facility manager and their designees will monitor tipping and loadout areas for waste accumulation and clean daily.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ13	The facility shall implement the Alternative Odor Management Plan contained in the TPR included as Appendix B. Should all efforts to mitigate odor complaints fail, the facility may need to provide rapid opening/closing doors and a negative pressure air system.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out by and responding to any complaints in a timely manner and following the protocols of the AOMP.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ14	Should odor complaints go unabated, limits on the types of waste materials accepted or a reduction in the amount of incoming tonnage may be specified by the LEA.	The facility manager shall work with the LEA to ensure the facility is operated in compliance with all regulations.	Facility Operator	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
HHM1	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.	All employees are trained to recognize and respond to potential hazardous materials discovered in the waste stream. Key employees are trained in the handling of hazardous materials.	Facility Operator	Ongoing	Any incident involving hazardous material, including spills, will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
HHM2	All drivers will attend a HazMat course to be able to identify hazardous materials in their collection routes to avoid picking them up.	Employees trained in identifying hazardous materials will be responsible to try to avoid picking up hazardous waste.	Facility Operator	Ongoing	Any incident involving hazardous material will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant
HHM3	Direct Disposal Transfer/ Processing Facility will implement an approved Hazardous Waste Load Checking Program as described in the facility 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.	All employees are trained to recognize and respond to potential hazardous materials discovered in the waste stream. Key employees are trained in the handling of hazardous materials.	Facility Operator	Ongoing	Any incident involving hazardous material will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
HHM4	A spill response kit will include absorbent material, brooms, shovels, 55gallon drums, protective gloves, clothing, boots, goggles and respiratory equipment.	The facility manager will inspect the spill response kit to ensure it is stock with appropriate materials.	Facility Operator	Ongoing	Any incident involving hazardous material, including spills, will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant
HHM5	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 Transfer/Processing Report.	Key employees are trained in the handling of hazardous materials.	Facility Operator	Ongoing	Any incident involving hazardous material, including spills, will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant
HHM6	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	The facility manager will maintain records regarding load checks and associated training.	Facility Operator	Ongoing	Load checks and associated training will be conducted as required under the Solid Waste Facility Permit.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
	checking records for the prior year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.					
HWQ1	The facility will comply with the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.	The facility manager will ensure that the facility is in compliance with the Industrial General Permit.	Facility Operator	Ongoing	Annually	Less than significant
HWQ2	The facility will implement Best Management Practices (BMPs) contained in a Stormwater Pollution Prevention Plan (SWPPP) in order to minimize the potential for stormwater contamination from runoff.	The facility manager will prepare and/or update the storm water pollution prevention plan (SWPPP) and mitigation monitoring plan (MPP), inspect, monitor and sample storm water conveyance facilities and runoff in compliance with the general storm water permit.	Facility Operator	Ongoing	Daily, weekly, monthly, and annually	Less than significant
HWQ3	Proposed non-structural BMPs include: 1) Turning away any leaking truck; 2) Regularly scheduled preventative maintenance of facility vehicles; 3) Use of absorbent material to soak-up spots of leaked fluids; 4) Implementing a	The facility manager and Stormwater Pollution Prevention team will ensure all non-structural BMPs are implemented and properly conducted. All structural BMPs shall be cleaned and inspected before and after every storm.	Facility Operator	Ongoing	Daily and before and after storms	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
	litter control plan as contained in the Transfer/Processing Report; and 5) Regular cleaning of all areas.					
HWQ4	The operator will implement and comply with a "Litter Control Program" as set forth in the facility Transfer and Processing Report. A cleanup crew will be assigned to keep the site, ingress and egress points, and adjacent streets and alleys, free of litter. A designated litter control team will patrol adjacent public streets and sidewalks at least two times per day.	The facility manager and designees will ensure all non-structural litter patrols are implemented and properly conducted.	Facility Operator	Ongoing	Daily	Less than significant
N1	The project shall ~~company~~ comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 and any subsequent ordinances, assist in minimizing potential noise impacts which prohibit the emissions or	The facility manager and employees shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out.	Facility Operator	Ongoing	Sources of noise that could potentially cause and impact shall be noted in the special occurrences log book.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
	creation of noise beyond certain levels at adjacent uses unless technically infeasible.					
N2	Proper training will be provided to all employees to ensure facility operations are conducted in a manner that minimizes noise impacts.	The facility manager will monitor the site operation to ~~insure~~ ensure noise levels are kept to a minimum.	Facility Operator	Ongoing	Violations will be noted in the daily log.	Less than significant
N3	Hearing protection for personnel is provided to equipment operators and others subject to excessive noise levels from operations, incompliance with OSHA. Equipment meets OSHA requirements and is maintained to operate in a clean, quiet and safe manner.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out.	Facility Operator	Ongoing	Violations will be noted in the daily log.	Less than significant
PS1	Fire suppression equipment shall be continuously available and properly maintained.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out.	Facility Operator	Ongoing	Violations will be noted in the daily log.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
PS2	Class ABC fire extinguishers shall be located throughout the facility to provide additional fire protection.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out.	Facility Operator	Ongoing	Violations will be noted in the daily log.	Less than significant
PS3	Emergency safety and spill equipment shall be inspected monthly and maintained as required.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out.	Facility Operator	Ongoing	Violations will be noted in the daily log.	Less than significant
PS4	Fire extinguishers shall be inspected once a month and recharged yearly by a contractor.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out.	Facility Operator	Ongoing	Violations will be noted in the daily log.	Less than significant
PS5	Fire hoses shall be located throughout the site.	The facility manager shall be responsible for ~~insuring~~ ensuring that this mitigation measure is carried out.	Facility Operator	Ongoing	Violations will be noted in the daily log.	Less than significant

Table A-2
Implementation of Mitigation Measures

No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
U1	A Large Volume Solid Waste Facility Permit shall be obtained from CalRecycle.	An application for a large volume full solid waste facility will be obtained from the City of Los Angeles LEA Program in partnership with the California Department of Resources Recycling and Recovery (CalRecycle) prior to the start of any new operations proposed under this IS/MND.	Direct Disposal	Prior to the processing the increased amount of material proposed under this IS/MND.	Monthly inspections will be conducted by the LEA to insure the facility is operating as required under the solid waste facility permit.	Less than significant

APPENDIX B

RESPONSES TO COMMENTS ON DRAFT EIR (ORIGINALLY INCLUDED IN FINAL IS/MND)

TABLE RTC-1			
Letter Reference	**Agency/Organization/Individual**	**Date**	**Page # of Response**
CR	Letter from CalRecycle/California Department of Resources Recycling and Recovery (Benjamin Escotto, Environmental Scientist, Permitting & Assistance Branch – South Unit Waste Permitting, Compliance & Mitigation Division) 1001 I Street Sacramento, CA 95814	August 6, 2019	Final IS/MND: RTC-3 Errata Appendix B: 2
AF	Letter from April Fitzpatrick, Manager 1512 Calzona Street, LLC Email from April Fitzpatrick, Manager 1512 Calzona Street, LLC	August 20, 2019	Final IS/MND: RTC-9 Errata Appendix B: 9
BC	Letter from Blum Collins LLP, Hannah Bentley Of Counsel 707 Wilshire Boulevard, Suite 4880 Los Angeles, CA 90017	August 27, 2019	Final IS/MND: RTC-21 Errata Appendix B: 21
C	Letter from Public Utilities Commission Chi Cheung To, Senior Utilities Engineer Specialist, Rail Crossings and Engineering Branch, Rail Safety Division 320 West 4th Street, Suite 500 Los Angeles, CA 90013	August 29,2019	Final IS/MND: RTC-36 Errata Appendix B: 36
CT	Letter from California Department of Transportation District 7 – Office of Regional Planning 100 S. Main Street, Suite 100 Los Angeles, CA 90012 (Miya Edmonson, IGR/CEQA Branch Chief)	August 29, 2019	Final IS/MND: RTC-40 Errata Appendix B: 40

California Environmental Protection Agency

Gavin Newsom
California Governor

Jared Blumenfeld
Secretary for Environmental Protection

Scott Smithline
CalRecycle Director

CalRecycle

Department of Resources Recycling and Recovery

August 6, 2019

Jose Gutierrez, Environmental Supervisor 2
City of Los Angeles, Local Enforcement Agency
Los Angeles Department of Building and Safety
Environmental Affairs Division
221 N. Figueroa Street, Room 1250
Los Angeles, CA 90012

Subject: SCH No. 2019079096 –Draft Initial Study/Mitigated Negative Declaration for Direct Disposal, SWIS No. 19-AR-1228 – City of Los Angeles

Dear Mr. Gutierrez:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The City of Los Angeles Local Enforcement Agency, Los Angeles Department of Building and Safety, Environmental Affairs Division, acting as Lead Agency, has prepared and circulated a Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The name of proposed project is Draft Initial Study/Mitigated Negative Declaration-Direct Disposal Large Volume Solid Waste Transfer/Processing Facility. The proposed project is located at 3720 Noakes Street, Los Angeles, CA 90023. The proposed project is situated east of Calzona Street, west of Los Palos Street and south of Union Pacific Avenue. The project site is approximately 1.2 acres and is currently zoned for heavy industrial. All immediately adjacent properties are also zoned for heavy industrial. A mill, a garment manufacturing facility, and a warehouse occupy the north side of the proposed project. A printing facility occupies property to the east, a wholesale distribution warehouse occupies property to the west, and a vacant strip of land owned by Union Pacific Railway is located to the south.

Direct Disposal is currently a Medium Volume Construction and Demolition/Inert Debris Processing Facility that operates 24 hours per day, seven days per week and can process and transfer up to 175 tons per day (TPD). The site consists of a building that houses processing equipment (screens and a sort line), a repair shop, truck scales, a scale house and outdoor storage areas. The site is fully

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www.CalRecycle.ca.gov • (916) 322-4027

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enclosed by an 8-foot tall perimeter fence. Off-site parking is provided at 3719 Noakes Street (storage of roll-off containers also occurs here).

The proposed project would allow for Direct Disposal to increase the processing and transferring of solid waste material to 500 TPD. The facility would still operate 24 hours per day, seven days per week. Proposed improvements to increase operational efficiency include: opening new access doors on the east and west side of the building to improve vehicle circulation, material processing and material transfer, adding a low speed shredder, adding screens, increasing bunker capacities and extending the sort line. Future improvements may include a vehicle queuing lane, a truck scale, a scale-house and offices at 3719 Noakes Street.

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/MND, in addition to the specific location noted.

Comments for the Draft IS/MND and Mitigation Monitoring and Reporting Program (MMRP) are summarized in the table below:

Document	Page and Location	Comment	
Initial Study	P.13 – Environmental Factors Potentially Affected	The factors that require at least one mitigation measure should be checked. Recommend to rephrase "…one impact that is a "Potentially Significant Impact" as indicated by the checklist…" to "…one impact that is "Potentially Significant Unless Mitigation is Incorporated" as indicated by the checklist…"	CR1
Initial Study	P.19, 21, 34 and 38 – Air Quality (3.3 b), Air Quality (3.3 e), Public Services (3.13 a), and Utilities and Service Systems (3.16 g)	Each of these sections has mitigation measures cited. "Potentially Significant Unless Mitigation Incorporated" should be checked for each of these sections.	CR2
MND	P.3 – Proposed Project (Section 1.6)	Recommend to clarify the description of the facility from "…Medium Volume Direct Disposal Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF)…" to "…Medium Volume Construction and Demolition/Inert Debris (CDI) Processing Facility named Direct Disposal, a type of Material Recovery Facility (MRF)..."	CR3

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Document	Page and Location	Comment	
MND	P.3 – Proposed Project (Section 1.6)	This section states that "The proposed Large Volume SWFP will allow up to 500 TPD of solid waste to be processed and transferred at the Direct Disposal facility." Section 3.3 (e) of the Initial Study states that the facility (in addition to CDI) will be receiving municipal solid waste (MSW), greenwaste and organic waste. Recommend to specify in the Proposed Project section the different streams of material the facility will be receiving. Figure 3-Site Plan should also show where each stream of material will be stored.	CR4
MND	P.3 – Proposed Project (Section 1.6)	The term "COD" is used to describe incoming material. What does "COD" stand for?	CR5
MND	P.5 – Site Plan (Figure 3)	Section 1.6 states that there is a repair shop. Could not locate the repair shop on the Site Plan.	CR6
MND	P.6 – Proposed Project (Section 1.6)	Title 14, Section 18221 of the California Code of Regulations (CCR) is referenced in regards to a Transfer/Processing Report (TPR). The correct regulation is Title 14, Section 18221.6.	CR7
MND	P.7 – City-Wide Community Plan Map (Figure 4)	The image on this page is blurry. Can a clearer image be used?	CR8
MND	P.9 – General Plan and Zoning (Section 1.7)	There are two bullet points in this section. The second bullet point describes the location of the facility, not the contents of the referenced Los Angeles Municipal Code. Thus the second bullet point should not be a bullet point, but simply its own paragraph.	CR9
MMRP	P.14 – Table A-2	Mitigation measure HHM6 is missing.	CR10

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Document	Page and Location	Comment
MMRP	P.16 – Table A-2	The description of mitigation measure N-1 states, "The project shall company with the City of Los Angeles Noise Ordinance..." This should restated as "The project shall comply with the City of Los Angeles Noise Ordinance..."

CR11

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the MND and in carrying out their responsibilities in the CEQA process. CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is to be adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is to be adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 916.341.6138 or by e-mail at benjamin.escotto@calrecycle.ca.gov.

Sincerely,

Benjamin Escotto

Benjamin Escotto, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Jeff Hackett - CalRecycle
jeff.hackett@calrecycle.ca.gov

David Thompson – LEA
david.thompson@lacity.org

Governor's Office of Planning & Research

AUG 06 2019

STATE CLEARINGHOUSE

Comment CR 1 – On page 13 of the Draft IS/MND, regarding "Environmental Factors Potentially Affected", the factors that require at least one mitigation measure should be checked. Recommend to rephrase " ... one impact that is a "Potentially Significant Impact" as indicated by the checklist... " to " ... one impact that is "Potentially Significant Unless Mitigation is Incorporated" as indicated by the checklist..."

Response CR 1–The Clarifications and Modifications Section, (page CM-7 of the Final IS/MND or Section 1 page 14 of this errata), revises "Environmental Factors Potentially Affected" to address comment CR1, and those potential environmental effects requiring mitigation measures have been checked. as mitigation measures were included in the Draft IS/MND. This correction will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 2 – On pages 19, 21, 34 and 38- of the Draft IS/MND, regarding Air Quality (3.3 b), Air Quality (3.3 e), Public Services (3.13 a), and Utilities and Service Systems (3.16 g), each of these sections has mitigation measures cited. "Potentially Significant Unless Mitigation Incorporated" should be checked for each of these sections.

Response CR 2 – The Final IS/MND Clarifications and Modifications section revises the Draft IS/MND checklist to reflect that the impacts for Air Quality (3.3 b and 3.3 e), Public Services (3.13 a), and Utilities and Service Systems (3.16 g) are revised to "Potentially Significant Unless Mitigation Incorporated". See Section 1, Comments and Modifications, pages CM-8 and CM-10 of the Final IS/MND or Section 3, pages 20, 24, 37, and 41 of this errata. These corrections will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 3 – On page 3- of the Draft IS/MND, regarding the Proposed Project (Section 1.6), recommend to clarify the description of the facility from " ... Medium Volume Direct Disposal Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF) ..." to " ... Medium Volume Construction and Demolition/Inert Debris (CDI) Processing Facility named Direct Disposal, a type of Material Recovery Facility (MRF) ...".

Response CR 3 – The Clarifications and Modifications Section 1, page CM-1 or Section 1 page 4 of this errata, revises the first sentence of the first paragraph of the Draft IS/MND to read: "The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow expansion of the existing 175 ton per day (TPD) Direct Disposal Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF) (reference CalRecycle SWFP no. 19-AR-1228), located at 3720 Noakes Street in the City of Los Angeles. This revision to the project description will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 4 – On page 3- of the Draft IS/MND, regarding the Proposed Project (Section 1.6), this section states that "The proposed Large Volume SWFP will allow up to 500 TPD of solid waste to be processed and transferred at the Direct Disposal facility." Section 3.3 (e) of the Initial Study states that the facility (in addition to CDI) will be receiving municipal solid waste (MSW), greenwaste and organic waste. Recommend to specify in the Proposed Project section the different

streams of material the facility will be receiving. Figure 3-Site Plan should also show where each stream of material will be stored.

Response CR 4 – Source separated organics and greenwaste will not be accepted at the facility. If MSW is being tipped and transferred at the facility it will be temporarily stored in Bunker B1 as shown in **Figure 3** (see Comments and Modifications Section page CM-3 or Section 1 page 6 of this errata). The Clarifications and Modifications Section eliminates references to greenwaste and organic material in Section 3.3 (Air Quality), Subsection "e", (see Comments and Modifications Section page CM-10 of the Final IS/MND or Section 3, page 24 of this errata) and from the mitigation monitoring and reporting program Appendix A, mitigation measures AQ 10 and AQ11 (See Final IS/MND Comments and Modifications Section page CM-11 or Appendix A pages 2, 3 and 10 of this errata). This revision to the project description will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 5 – On page 3- of the Draft IS/MND, regarding the Proposed Project (Section 1.6), the term "COD" is used to describe incoming material. What does "COD" stand for?

Response CR 5 – Section 1, Clarifications and Modifications, page CM-1 of the Final IS/MND or Section 1, page 4 of this errata corrects the typo "COD" to "C&D".

Comment CR 6 – On page 5 of the Draft IS/MND, regarding Figure 3 "Site Plan", Section 1.6, states that there is a repair shop. Could not locate the repair shop on the Site Plan.

Response CR 6 – There repair shop, which is an open area, is shown on the revised **Figure 3** in Section 1, Clarifications and Modifications, on page CM-4 of the Final IS/MND or Section 1, page 6 of this errata (next to HHW locker).

Comment CR 7 – On page 6 of the Draft IS/MND, regarding the proposed project (Section 1.6), Title 14, Section 18221 of the California Code of Regulations (CCR) is referenced in regards to a Transfer/Processing Report (TPR). The correct regulation is Title 14, Section 18221.6.

Response CR 7 – Comment noted. The Clarifications and Modifications Section includes a reference to the correct regulation Title 14, Section 18221.6. See page Clarifications and Modifications Section, page CM-4 of the Final IS/MND or Section 1, page 7 of this errata.

Comment CR 8 – On page 7 of the Draft IS/MND, regarding Figure 4 "City-Wide Community Plan Map", the image on this page is blurry. Can a clearer image be used?

Response CR 8 – Comment noted. A better copy of the City-Wide Community Plan Map has been included in the in the Clarifications and Modifications Section, on page CM-5 of the Final IS/MND or Section 1, page 8 of this errata.

Comment CR 9 – On page 9 of the Draft IS/MND, regarding Section 1.7 "General Plan and Zoning", there are two bullet points in this section. The second bullet point describes the location of the facility, not the contents of the referenced Los Angeles Municipal Code. Thus, the second bullet point should not be a bullet point, but simply its own paragraph.

Response CR 9 – Comment noted. The second bullet point has been revised to a separate paragraph in the Clarifications and Modifications Section, page CM-7 of the Final IS/MND or Section 1, page 10 of this errata.

Comment CR 10 – On page 14 of Table A-2 of Appendix A of the Draft IS/MND, mitigation measure HHM6 is missing.

Response CR 10 – Comment noted. Appendix A, Table A-2 "Implementation of Mitigation Measures" of the Draft IS/MND has been revised to include mitigation measure HHM6. See Comments and Modifications Section, page CM-12 of the Final IS/MND or Appendix A pages 4 and 14 of this errata.

Comment CR 11 – On page 16 of Table A-2 of Appendix A of the Draft IS/MND, the description of mitigation measure N-1 states, "The project shall company with the City of Los Angeles Noise Ordinance ... 11 This should restated as "The project shall comply with the City of Los Angeles Noise Ordinance ... II

Response CR 11 – Comment noted. Appendix A, Table A-2 "Implementation of Mitigation Measures – N1" of the Draft IS/MND has been revised to correct the word "company" to "comply" See Comments and Modifications Section, page CM-13 of the Final IS/MND or Appendix A, page 16 of this errata.

August 20, 2019

City of Los Angeles Department of Building and Safety Local Enforcement Agency
Department of Building and Safety
201 North Figueroa Street
Los Angeles, CA 90012

Re: Mitigation Measures / Comments – Direct Disposal
3720 Noakes Street, Los Angeles, CA

Attention: Jose Gutierrez, LEA Program Supervisor

The information received in your Notice of Availability and Intent to Adopt a Mitigated Negative Declaration Letter for the Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project received in July, 2019, is clearly flawed with many issues not properly identified or addressed. The proposed expansion project will have significant environmental health and safety impacts to the properties and businesses in the surrounding areas. AF-1

The proposed project increase of solid waste processing from 175 tons per day to 500 tons per day will cause significant environmental health and safety issues. The traffic impacts, street and road damage, dust, dirt, particulates, trash debris, air quality, health issues, vehicle damage, and noise are many of the challenges the surrounding businesses are already faced with. If expansion is allowed, these issues, along with many more, will increase exponentially. Volume speaks numbers even though there is no new floor area included as part of the proposed project. AF-2

Currently, Calzona Street, is used as a throughway to reach the facility. This limits access and hinders all businesses operations. Customers and employees, both in vehicles and on foot, are delayed in going in and out of the business establishments on that street. Trucks are lined up at the stop sign, blocking loading docks, driveways, and parking spots as a result of the congestion as it exists today. With the proposed increase in tonnage, the additional amount of vehicle traffic traveling down this street will further hinder existing businesses and their functionality. The trucks driving to and from the Facility follow no set traffic control, safety and enforcement plan which causes an overabundance of unnecessary issues to all parties affected by this type of disposal business. AF-3

Often times, many of the trucks that visit the site travel at a high rate of speed. This causes safety issues especially since there is no enforcement in the area currently to address this matter and it can only get worse if there is an increase in daily tonnage. Trash vehicles are not currently covering their loads properly which causes debris (large and small) to spew over onto the street creating with a large amount eventually blowing into the businesses. There is no control over the way the trash is loaded on the trucks currently at the existing 175 tons per day. The magnitude of 500 tons per day will create significant additional street trash. The types of materials that have been a chronic issue are metal pieces, nails, and wood which ultimately cause damage to company and employee vehicles and tires. The streets in the surrounding area continue to be filthy due to the facility being in close proximity. The trash, dirt, debris, and air particles generated as a result of the disposal trucks traveling in the area is not addressed. AF-4

Additionally, the materials actually processed at the facility also cause many issues as the trash is moved through the sorting line. The screens and fences do not provide full capture which affects the surrounding community's quality of life. Dirt, dust and debris can be seen floating in the air which ultimately settles on the local businesses. On a daily basis, the internal and external portions of the surrounding buildings are covered with a layer of dirt, dust and debris. The furniture, equipment, and floors are also covered with dirt and dust. Management of this particular location is forced to hire additional staff to clean the affected areas. Management has also been forced to address the tenants and their respective employees who have filed formal health complaints and have exercised the use of sick days as a result. Several employees now wear masks when conducting routine business functions.

The Air Quality Management District was contacted in an effort to address some of the aforementioned issues via complaint #277016 which was filed on June 1, 2017. The inspector at the time and the Direct Disposal owner tried to lessen the issues by installing additional fencing, however, many of the issues continue. AF-5

Therefore, in summary, the Facility located at 3720 Noakes Street should not be approved for expansion unless the following mitigation measures are permanently implemented: AF-6

1. Daily street sweeping/cleaning - removal of all street trash, nails, dirt, dust, debris as a result of the truck traffic in the area

2. Fully enclose the Disposal Facility - this is the only way trash, dirt, dust, debris, and particulates can be eliminated from traveling to the surrounding businesses and to keep the noise levels down

3. Traffic enforcement measures - disposal trucks properly covered, enforce traffic laws which includes speeding

4. Traffic control measures - divert traffic to major arterials, delineation, signage, installation of humps/bumps, enforce safety measures and vehicle requirements

5. Limit hours of operation at the facility - to limit the duration of traffic congestion issues in the surrounding areas.

AF-6 (cont.)

Based on the existing matters identified in this letter, an even larger issue and overarching concern is the continued decline in property values as a result of this Facility. This type of Facility (material recovery and transfer station facility) reduces property values in the area The affected properties value will further plummet should the proposed expansion be approved. Additionally, there will a decline in in leasing commercial at the current rate and vacancies with increase unless the City of Los Angeles places these mitigation measures.

AF-7

Your consideration of these matters would be greatly appreciated,

1512 Calzona Street, LLC
1540 Calzona Street
Los Angeles, CA 90023
April Fitzpatrick, Manager

From: **April Fitzpatrick** <aprilfitz@earthlink.net>
Date: Wed, Aug 28, 2019 at 11:01 AM
Subject: Mitigation Measures / Comments - 3720 Noakes Street, LA, CA - Continued!
To: Jose Gutierrez <jose.gutierrez@lacity.org>
Cc: Eli Antaky Jr. - Dad <antaky@antakyquilting.com>, Derek Antaky <derek@antakyquilting.com>, Mike from Magnum Properties <mikem@magnumprops.com>

Hi Jose,

As an addendum to my previously sent letter addressing our concerns, please include these additional requests which includes supporting documentation. All of this information is related to Direct Disposal's affects to the surrounding businesses in the area. AF-8

These photos depict an unpaved area in the street right-of-way that causes a dust/dirt problem when trucks stage/idle/park on Calzona street in front of our building waiting to weigh/dump their loads. We do not want construction and demo trucks lining up on Calzona, however, when they do, it presents unnecessary issues. The unpaved areas follow the length of the street and there is a larger piece at the corner of Calzona & Noakes street. Can you please include the requirement that the City of Los Angeles Public Works Department paves this area? AF-9

As you can see, there are countless truck tire marks because they use this as a queuing up area throughout the day to reach Direct Disposal's scale before dumping. Here is an example below of a truck with a full load with one side of the truck's tires in the unpaved area sitting idle kicking up dust/dirt. AF-10

Please see below, In walking the area daily for metals, nails, debris, this is what we found within 5 minutes. Many of these items with extremely sharp edges/points. Flat tires continue to be an ongoing problem with workers as a result. AF-11

Lastly, the old rail lines continue to exist going across Noakes Street in front of Direct Disposal. The metal channels jolt all trucks passing over throughout the day which also creates unnecessary dust and dirt. Please also include paving in this area as a requirement so that the City of Los Angeles Public Works department can perform the work. It appears the City has already paved other areas where the rail is no longer use, just not there specifically. AF-12

Your consideration is greatly appreciated.

Photos referenced in comment AF-9.

Photos Referenced in comment AF-10

As you can see, there are countless truck tire marks because they use this as a queuing up area throughout the day to reach Direct Disposal's scale before dumping. Here is an example below of a truck with a full load with one side of the truck's tires in the unpaved area sitting idle kicking up dust/dirt.

Please see below, in walking the area daily for metals, nails, debris, this is what we found within 5 minutes. Many of these items with extremely sharp edges/points. Flat tires continue to be an ongoing problem with workers as a result.

April Fitzpatrick (AF) Comments and Responses

Comment AF 1 – The information received in your Notice of Availability and Intent to Adopt a Mitigated Negative Declaration Letter for the Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project received in July, 2019, is clearly flawed with many issues not properly identified or addressed. The proposed expansion project will have significant environmental health and safety impacts to the properties and businesses in the surrounding areas.

Response AF 1 – The draft IS/MND did not find any potential for the project to adversely impact environmental health and safety with adoption of proposed mitigation measures. Potential environmental health and safety impacts related to air quality, hazards and hazardous materials , and hydrology and water quality resulting from the proposed project were analyzed in the Draft IS/MND. With adoption of the proposed mitigation measures the proposed project will not result in significant environmental impacts.

Comment AF 2 – The proposed project increase of solid waste processing from 175 tons per day to 500 tons per day will cause significant environmental health and safety issues. The traffic impacts, street and road damage, dust, dirt, particulates, trash debris, air quality, health issues, vehicle damage, and noise are many of the challenges the surrounding businesses are already faced with. If expansion is allowed, these issues, along with many more, will increase exponentially. Volume speaks numbers even though there is no new floor area included as part of the proposed project.

Response AF 2 –See Response AF-1 for a discussion of project impacts related to environmental health and safety issues. The Draft IS/MND found that the proposed project did not create any public health and Safety impacts with implementation of the proposed mitigation measures.

While heavy trucks such as those using the Direct Disposal facility can result in additional wear and tear on local roadways, the project site is located in a “heavy industrial” zoned area with numerous nearby warehouses and industrial uses that generate large numbers of heavy truck trips over the local street system. The City of Los Angeles Bureau of Street Services/Streets LA is responsible for maintaining the local street system, and according to the Streets LA website, Noakes Street is classified as being in “poor condition”. Any issues with the condition of the street should be directed to the City of Los Angeles Bureau of Street Services.

In response to the commentator’s point regarding air quality and health issues, an air quality analysis has been prepared and included in the Final IS/MND based on the California Emission Estimator Model (CalEEMod) version 2016.3.2 and use of the AQMD’s “Off-Road – Model Mobile Source Emission Factors”. Detailed worksheets have been included in **Appendix CM-I** of the Final IS/MND or **Appendix L** of this errata. Based on the air quality analysis, the project will not exceed any of the South Coast Air Quality Management District’s air quality standards and will not result in a significant air quality impact.

The use of traffic spotters by Direct Disposal is intended to increase safety and reduce the impacts of vehicles traveling to and from the project site on the local street system and local businesses.

Comment AF 3 – Currently, Calzona Street, is used as a throughway to reach the facility. This limits access and hinders all businesses operations. Customers and employees, both in vehicles and on foot, are delayed in going in and out of the business establishments on that street. Trucks are lined up at the stop sign, blocking loading docks, driveways, and parking spots as a result of the congestion as it exists today. With the proposed increase in tonnage, the additional amount of vehicle traffic traveling down this street will further hinder existing businesses and their functionality. The trucks driving to and from the Facility follow no set traffic control, safety and enforcement plan which causes an overabundance of unnecessary issues to all parties affected by this type of disposal business.

Response AF 3 –In addition to using Calzona Street, vehicles can access the site using Esperanza, Mirasol and Calada Streets. The use of traffic spotters by Direct Disposal is intended to reduce the impacts of vehicles traveling to and from the project site on the local street system and local businesses, and to prevent traffic associated with vehicles using the facility from impacting through traffic as well as other businesses in the area. Customers and company drivers are instructed to obey speed limits and be courteous of local business.

Comment AF 4 – Often times, many of the trucks that visit the site travel at a high rate of speed. This causes safety issues especially since there is no enforcement in the area currently to address this matter and it can only get worse if there is an increase in daily tonnage. Trash vehicles are not currently covering their loads properly which causes debris (large and small) to spew over onto the street creating with a large amount eventually blowing into the businesses. There is no control over the way the trash is loaded on the trucks currently at the existing 175 tons per day. The magnitude of 500 tons per day will create significant additional street trash. The types of materials that have been a chronic issue are metal pieces, nails, and wood which ultimately cause damage to company and employee vehicles and tires. The streets in the surrounding area continue to be filthy due to the facility being in close proximity. The trash, dirt, debris, and air particles generated as a result of the disposal trucks traveling in the area is not addressed.

Response AF 4 –The operator will work to inform all drivers of the need to observe posted speed limits on- and off-site.

In response to the commentator's point regarding customers not covering their loads, it is the operator's policy to not allow use of the facility unless the incoming load is tarped. In addition, all outbound material loads are prohibited from leaving the site unless they are tarped. Direct Disposal has a litter control plan and designated employees assigned to sweeping and picking up litter in the area. The commentator's concerns are noted, and additional efforts will be made to address those concerns.

Comment AF 5 – Additionally, the materials actually processed at the facility also cause many issues as the trash is moved through the sorting line. The screens and fences do not provide full capture which affects the surrounding community's quality of life. Dirt, dust and debris can be seen floating in the air which ultimately settles on the local businesses. On a daily basis, the internal and external portions of the surrounding buildings are covered with a layer of dirt, dust and debris. The furniture, equipment, and floors are also covered with dirt and dust. Management of this

particular location is forced to hire additional staff to clean the affected areas. Management has also been forced to address the tenants and their respective employees who have filed formal health complaints and have exercised the use of sick days as a result. Several employees now wear masks when conducting routine business functions.

The Air Quality Management District was contacted in an effort to address some of the aforementioned issues via complaint #277016 which was filed on June 1, 2017. The inspector at the time and the Direct Disposal owner tried to lessen the issues by installing additional fencing, however, many of the issues continue.

Response AF 5 – Dust is generated by operations at the facility, and the use of a misting system, debris fencing and watering dusty loads when they are tipped all reduce potential impacts to less than significant levels. Installation of a misting system that covers all dust generating activities has been included as a mitigation measure and will be required as a condition of the Solid Waste Facility Permit.

Dust complaints are enforced by the South Coast Air Quality Management District (SCAQMD), and the facility is inspected on a regular basis. Direct Disposal not been cited by the SCAQMD for creating excessive dust.

Comment AF 6 – Therefore, in summary, the Facility located at 3720 Noakes Street should not be approved for expansion unless the following mitigation measures are permanently implemented:

1. Daily street sweeping/cleaning - removal of all street trash, nails, dirt, dust, debris as a result of the truck traffic in the area

2. Fully enclose the Disposal Facility - this is the only way trash, dirt, dust, debris, and particulates can be eliminated from traveling to the surrounding businesses and to keep the noise levels down

3. Traffic enforcement measures - disposal trucks properly covered, enforce traffic laws which includes speeding

4. Traffic control measures - divert traffic to major arterials, delineation, signage, installation of humps/bumps, enforce safety measures and vehicle requirements

5. Limit hours of operation at the facility - to limit the duration of traffic congestion issues in the surrounding areas.

Response AF 6 – The following responses are provided in regard to the commentator's recommended mitigation measures:

1. The facility operator will continue to conduct daily street sweeping/cleaning - removal of all street trash, nails, dirt, dust, and debris generated as a result of the truck traffic in the area associated with the Direct Disposal facility

2. Material tipping, and a portion of the sorting and processing operations, are conducted inside the existing building. Open operations are permitted under the current use of land permit. Construction of better debris fencing and installation of misting systems over dust generating activities will reduce the potential impacts associated with processing MSW and CDI material such as dirt, dust, debris, odors, and particulates on surrounding businesses.

3. The facility operator will work with employees and customers to comply with on and off-site vehicle speed limits and tarping requirements.

4. The facility operator will work with employees, customers, and local businesses to address traffic routing and control issues, and use spotters, as well as signage, to enforce safety measures and vehicle tarping requirements. The installation of street signage or street humps/bumps is under the jurisdiction of the City and the applicant does not have the authority to make such improvements.

5. The facility is currently permitted to operate 24 hours per day, seven days per week. Vehicles using the facility are primarily associated with the construction industry and tend to arrive during off-peak hours since they start work early in the morning and end work in the early afternoon (off-peak hours). In addition, the applicant can dispatch company vehicles, and call for material transfer vehicles, during off-peak hours in order to reduce the time drivers sit in traffic. Limiting the hours of operation could result in increased traffic impacts by increasing the number of vehicles using the facility during peak traffic hours.

   Regarding noise levels, the facility is required to comply with the City of Los Angeles regulations contained in Section 111.03, which is enforceable by the City Department of Building and Safety. No noise violations have been issued for the current operations.

Comment AF 7 – Based on the existing matters identified in this letter, an even larger issue and overarching concern is the continued decline in property values as a result of this Facility. This type of Facility (material recovery and transfer station facility) reduces property values in the area. The affected properties value will further plummet should the proposed expansion be approved. Additionally, there will a decline in in leasing commercial at the current rate and vacancies with increase unless the City of Los Angeles places these mitigation measures.

Response AF 7 – Comment noted. The reduction in property values associated with a recycling and transfer station is an opinion of the commentator and not supported by any empirical data.

Comment AF 8 – As an addendum to my previously sent letter addressing our concerns, please include these additional requests which includes supporting documentation. All of this information is related to Direct Disposal's affects to the surrounding businesses in the area.

Response AF 8 – Comment noted.

Comment AF 9 – These photos depict an unpaved area in the street right-of-way that causes a dust/dirt problem when trucks stage/idle/park on Calzona street in front of our building waiting to

weigh/dump their loads. We do not want construction and demo trucks lining up on Calzona, however, when they do, it presents unnecessary issues. The unpaved areas follow the length of the street and there is a larger piece at the corner of Calzona & Noakes street. Can you please include the requirement that the City of Los Angeles Public Works Department paves this area?

Response AF 9 – In response to the commentator's point regarding unpaved portions of the street causing dust/dirt problems, the project does not require street dedications or improvements since no new construction is being proposed. If street dedications and improvements were being required, they would only be constructed adjacent to the subject property which would not full address the problem. Street sweeping and litter patrols are proposed as part of the project to reduce the potential for dust and dirt being generated from vehicles traveling along unpaved portions of the local street system.

Comment AF 10 – As you can see [from the photos], there are countless truck tire marks because they use this as a queuing up area throughout the day to reach Direct Disposal's scale before dumping. Here is an example below of a truck with a full load with one side of the truck's tires in the unpaved area sitting idle kicking up dust/dirt.

Response AF 10 – Comment noted. Direct Disposal's trucks and the trucks of customers, as well as trucks from the other businesses in the area use the dirt shoulder for parking, staging, and turning. The shoulder shown in the photos above is adjacent to a property not owned by Direct Disposal. Any future street improvements would be the responsibility of the adjacent property owner and would not be required until the property is redeveloped. Direct Disposal is committed to minimizing track-out from the site, employing the use of a street sweeper and providing regular litter patrols.

Comment AF 11 – Please see photos below. In walking the area daily for metals, nails, debris, this is what we found within 5 minutes. Many of these items with extremely sharp edges/points. Flat tires continue to be an ongoing problem with workers as a result.

Response AF 11 – Comment noted. As noted previously, Direct Disposal is committed to minimizing track-out from the site, employing the use of a street sweeper and providing regular litter patrols. Employees are directed to be on the lookout for objects such as those pictured and litter in general and properly dispose of such materials when found. All inbound loads are tarped so the debris pictured did not likely come from vehicles using the facility. The commenters assertation the objects pictured are from Direct Disposal can not verified.

Comment AF 12 – Lastly, the old rail lines continue to exist going across Noakes Street in front of Direct Disposal. The metal channels jolt all trucks passing over throughout the day which also creates unnecessary dust and dirt. Please also include paving in this area as a requirement so that the City of Los Angeles Public Works department can perform the work. It appears the City has already paved other areas where the rail is no longer use, just not there specifically.

Response AF 12 –The City Department of Public Works and Bureau of Street Services are responsible for all work in the public right-of-way, and rail lines fall under the jurisdiction of the California Public Utilities Commission. The abandonment of any rail lines/spurs would need to be

initiated by the rail company or property owner served by the rail line or spur and approved by the railroad company that owns the infrastructure. Any street patching would need to be approved and inspected by the City Department of Public Works.

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August 27, 2019

Jose Gutierrez Local Enforcement Agency 221 N. Figueroa Street, Room 1250 Los Angeles, CA 90012 jose.gutierrez@lacity.org	***Via Email (with Attachments) and U.S. Mail (without Attachments)***

Re: *Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project,* Mitigated Negative Declaration

Dear Mr. Gutierrez:

This letter and the Attachments provided herewith constitute our comments under the California Environmental Quality Act ("CEQA") on behalf of the Golden State Environmental Justice Alliance on all approvals related to the above-cited project ("the Project") and its Mitigated Negative Declaration ("MND"), a Notice of Availability for which went out on July 29, 2019. The proposed Project anticipates changing the permits for the sites at 3720 and 3719 Noakes Street in the City of Los Angeles to allow applicant Direct Disposal to operate a Large Volume Solid Waste Facility accepting up to 500 tons per day ("tpd") of both construction, demolition and inert ("CDI") material including up to 100 tpd of municipal solid waste ("MSW"). At present, Direct Disposal operates a medium volume (up to 175 tpd) material processing facility at these addresses for CDI only. *See* MND at 3 (PDF at 6), Transfer/Processing Report ("TPR") (attached to MND) at 1 (PDF at 74). The Project apparently requires a Solid Waste Facility Permit ("SWFP") pursuant to various provisions of Title 27 of the California Code of Regulations; it appears to us (based on our comments immediately below) that it also requires a Conditional Use Permit ("CUP") according to the City of Los Angeles Municipal Code. There may be other permits required, and the MND is flawed in not identifying these anywhere in the document.

BC1

BC2

Project Site Description

The Notice of Availability and the MND describe the Project site as 3720 Noakes Street, Los Angeles, CA, but this is not fully accurate, as the Project clearly anticipates the use of the site across the street at 3719 Noakes Street as a "staging area," *see, e.g.,* TPR, attached to MND, at 6 (Figure 4) (PDF at 79), for vehicle queuing, container storage and

BC3

parking (functions it is currently performing at the lower 175 tpd authorization currently held).[1] Indeed, the MND states that:

> Future improvements may also include a vehicle queuing lane, a truck scale, scale-house and offices at the 3719 Noakes Street property which will free up additional space at 3720 Nokes [sic] Street form [sic] material storage and processing.

BC3

MND at 3 (PDF at 6). These latter functions are not apparently evaluated in the MND at all and therefore Direct Disposal's pursuance of them (with the Local Enforcement Agency's apparent tacit approval) would violate CEQA, if not other laws. But the larger point is that an environmental impact report ("EIR") should have been prepared because if the site description had properly included 3719 Noakes Street, as the TPR does, *see* TPR at 1 (PDF at 74),[2] there would be ***more*** than a fair argument that a significant impact on the environment could occur, because the Project involves more than 100 trucks per day visiting these two sites within 1,000 feet of residences, and that is the threshold for further review (and for required changes in a project) as set forth in the California Air Resources Board's ("ARB's") *Air Quality and Land Use Handbook* (2005) (a copy of which is provided as Attachment A hereto). *See* ARB, *Air Quality and Land Use Handbook* at 15. *See also* TPR at 8 (PDF at 81) (Table 2, describing "Facility Traffic" as 224 "Vehicles Per Day," including 148 Inbound Vehicles, and 22 Outbound Vehicles, all of which would be trucks). It seems apparent to us that Direct Disposal, the Local Enforcement Agency, and their CEQA consultant, Clements Environmental, must have been aware of this basic fact and deliberately excluded 3719 Noakes Street from the 1,000 foot review included in the MND at 10 (MND Figure 6) (PDF at 13), and in the TPR at 4 (TPR Figure 4) (PDF at 77), for, as the MND acknowledges, there is residential development 1,010 feet from the "Project" if one excludes 3719 Noakes Street from the Project definition. *See* MND at 20 (Figure 7) (PDF at 23).

BC4

We'd like to know what notice regarding this Project has been provided to the residents on Los Palos Street, Prada Street, and La Puerta Street, and in what languages that notice was provided.

BC5

CUP Requirement

The second reason why the mislabeling of the Project as only involving 3720 Noakes Street is of concern is that the MND acknowledges that the Los Angeles Municipal Code ("LAMC") requires a CUP for a Recycling Materials Sorting Facility in an M3 Zone if the facility is less than 1,000 feet from an A, R, C, P, or PB zoned property. MND at 9 (PDF at 12), *citing* LAMC § 12.21A18(e). The "Facility," as reflected in the TPR (as

BC6

[1] *See also* TPR at 2 (PDF at 75), indicating that 3719 Noakes is used for "container storage, employee parking, and staging vehicles."

[2] The TPR states "This Transfer/Processing Report (TPR) has been prepared for, and at the request of, Direct Disposal ***for their operations at 3720 and 3719 Noakes Street***, in the City of Los Angeles." (Emphasis supplied.)

well as, apparently, the City's Certificates of Occupancy noted at TPR page 9 (PDF at 82)), includes 3719 Noakes Street, and therefore a CUP is required. Additionally, the facility is operating 24 hours per day and therefore requires a CUP because it is less than 1,000 feet from an R zone. BC6

We also note that the MND's citation to LAMC section 12.21A18(e) appears to be inaccurate because that section covers "Recycling Materials Sorting Facilities," at which "no processing of Recyclable Materials" "shall be permitted." LAMC § 12.21A18(e)(3); the present facility shreds and "processes" "Recyclable Materials" and therefore does not qualify. It would appear that the facility would be addressed by LAMC section 12.21A18(f), for "Recycling Materials Processing Facilities," but that it still would not qualify without obtaining a CUP because under subdivision (f): BC7

> notwithstanding any other provisions of the Code, Recyclable Materials collected and processed on the site shall be limited to paper, cardboard, glass, metal, plastic and other items that are deemed appropriate by the Department of Building and Safety, Bureau of Sanitation, and Fire Department.

LAMC § 12.21A18(f)(3). The facility does not qualify because it now proposes to handle MSW. While LAMC section 12.03, Definitions, provides that Recyclable Materials may contain "yard waste," it does not provide for the handling of MSW. Additionally, while we do not have time to parse all the requirements of the LAMC right now, we have difficulty believing that a new transporter or handler of MSW would not be subject to a CUP or some other type of permit. BC8

Additional Comments

MND at 7 (PDF at 10), Figure 4, includes a low-resolution image of a map of Los Angeles Area Community Plans. The resolution does not permit us to determine how the Project site is designated. BC9

MND at 8 (PDF at 11) contains a Boyle Heights Community Plan map which is not much better. Again, we hope the residents in the close-by low density multifamily housing were served with notice by mail in their own first languages. BC10

MND at 9 (PDF at 12) indicates that the facility has been a "medium volume solid waste transfer and processing facility" since 2008. However, page 3 of the MND (PDF at 6) indicates that the current permit is for a 175 tpd "Medium Volume Direct Disposal Construction, Demolition and Inert Material Recovery Facility (MRF)," which would appear to exclude permission to transfer MSW and organic wastes. This is a significant change. We believe the MND is materially misleading in this respect. BC11

The TPR at 9 (PDF at 82) states under the bullet point "Environmental Documentation" that a Mitigated Negative Declaration and Notice of Determination "was [sic] adopted by BC12

the Local Enforcement Agency on June 7, 2091." We have reviewed the City's legal notices for MNDs going back to January 31, 2019, *see* https://planning.lacity.org/eir/publication/mnd_pub.htm, and have seen no reference to this Project. Additionally, a MND may only be approved, and a Notice of Determination adopted, ***after*** there has been public review of the MND, which has not been completed in the case of this MND at this point. *See* Pub. Res. Code § 21152(a) (providing for filing of notices of determination with the county clerk "within five working days ***after the approval or determination becomes final***") (emphasis supplied). The filing of a Notice of Determination would therefore be illegal under CEQA both under the terms of section 21152, ***and*** because it would discourage public comment on the Project by falsely suggesting to potential commenters that the Project was a *fait accomplis*, which is opposite to CEQA's purposes.

BC12

We went to the website where the Local Enforcement Agency ("LEA") made the MND available, *see* https://www.ladbs.org/services/core-services/code-enforcement/lea-information and note that it nowhere gave members of the public notice as to when comments on the Project were due under CEQA, and simply provides a short description and a link to the MND. We had to go to the Office of Planning and Research's ceqanet database in order to figure out what the deadline was. We think this lack of clarity is similarly contrary to CEQA's purposes.

BC13

The TPR at 13 (PDF at 86) indicates that MSW will be transferred within 48 hours but that if it is not transferred with 24 hours, it will be containerized, which more than likely means it will be stored at 3719 Noakes Street, which again means that a CUP is required.

BC14

With regard to Air Quality impacts, the MND reaches the conclusion that the Project "will not increase any criteria pollutant," and that, apparently, it will not expose sensitive receptors to substantial pollutant concentrations because "[t]he site is over 1,000 feet from residences and the nearest sensitive receptors." MND at 19 (PDF at 22). We find the MND's analysis inadequate on both points:

- First, with regard to criteria pollutants, we note, as mentioned before, that the TPR says the Project will lead to a total[3] of 224 vehicles per day, of which 170 will be trucks. *See* TPR at 8 (PDF at 81) (Table 2, describing "Facility Traffic" as 224 "Vehicles Per Day," including 148 "Inbound Vehicles," and 22 "Outbound Vehicles," described in footnote 1 as consisting of "Inbound Commercial Vehicles: 5 tons per load; Inbound Self-Haul Vehicles – 1 ton per load; [and] Outbound Trucks: 23 tons per load"). While some of the "Self-Haul Vehicles" may be small trucks, we anticipate they will all be trucks or else they will not be

BC15

[3] At first blush, the TPR appears inconsistent with the MND, which states in its traffic section that the Project will lead to "an additional 274 daily vehicle trips (137 inbound and 137 outbound)." MND at 35 (PDF at 38). However, we presume that the traffic analysis addresses "additional" trips due to the Project, meaning that there are apparently approximately 87 vehicles per day visiting the site presently; if so, this means that the ratio of vehicles presently to vehicles predicted at 500 tpd would be about 39%, which is roughly proportionate to the increased tonnage attributable to the Project (175/500 = 35%). Additionally, 61% of the trips would be new trips (274/448 is approximately 0.61).

BC16

capable of transporting a ton of waste each. Attachment B to this letter is an updated Air Quality Impact Analysis for the Knox Business Park project in Riverside County, California. The Knox Business Park project Air Quality Impact Analysis appears to have been based on a total of 113 trucks idling per day (Attachment B PDF at 544, 546, 548, and 550), and the Project was expected to lead to emissions of oxides of nitrogen or NO_x (which is a precursor to ozone or smog) in the amounts of 354.35 pounds per day in the summer and 369.16 pounds per day in the winter. *See* Attachment B, letter at 2 (PDF at 2).[4] This was in comparison to the South Coast Air Quality Management District ("SCAQMD") threshold of 55 pounds per day for operations, and thus yielded a significant impact, for which the applicant and the County of Riverside prepared an EIR. Based on this information, there is frankly no fair argument that the Project ***does not*** have a significant impact on the environment, and thus an EIR should have been prepared.

BC15 (cont.)

- Regarding exposure of sensitive receptors to Toxic Air Contaminants ("TACs") such as Diesel Particulate Matter ("DPM"), since the Project involves more than 100 trucks per day, there would be an argument that the Project leads to a significant impact even if it ***were not*** less than 1,000 feet from the nearest sensitive receptors, but it ***is***. Accordingly, more analysis of impacts was required, based on the advice of the ARB in the *Air Quality and Land Use Handbook*, as noted previously.

BC17

In sum, CEQA does not permit a lead agency to avoid evaluating an impact by simply not acknowledging that it may occur. An EIR was required.

Still concerning Air Quality, the MND concludes that there will not be any significant increase in odors at the site, even though the Project involves the new receipt of MSW and organic and green wastes. The LEA's bare assurances do not eliminate a fair argument of a significant impact.

BC18

Regarding Hazards and Hazardous Materials, the MND acknowledges at 27 (PDF at 30) that incidental hazardous wastes will arrive on site. The MSW stream ***will*** include hazardous wastes and the discussion and proposed mitigation measures are inadequate.

BC19

Concerning stormwater from the site, the LEA acknowledges that it could initially violate water quality standards, but claims the impacts would be reduced to less than significant through compliance with Best Management Practices and the Industrial Storm Water General Permit. MND at 29 (PDF at 32). We are not so sanguine; litter cleaning will not prevent contact with stormwater of the materials inside the bins, leaking containers, etc.

BC20

As to Land Use and Planning, the LEA asserts that the Project is developable "by right" such that there is no land use conflict. We disagree as noted above.

BC21

[4] It is true that the Knox Business Park updated AQIA only addressed 113 trucks at Building D and the Project anticipated the development of a Building E as well; however, the AQIA still analyzed idling only at Building D and it still came up with a significant impact.

BC22

Regarding utilities and being served by a landfill with sufficient capacity, the MND is misleading in stating that the increase in use will only be to 400 tpd. (MND at 38, PDF at 41). BC23

We request that you advise us immediately when the responses to the comments on the MND are made available by mail and email at collins@blumcollins.com and bentley@blumcollins.com, and that we be placed on the list of parties to be notified of all actions relating to this Project under Public Resources Code section 21092.2. Please forward this request to the director of the LEA. BC24

Thank you for your consideration.

Sincerely,

Hannah Bentley
Of Counsel
BLUM COLLINS, LLP

Attachments A, B: Included with emailed copy

Blum Collins (BC) Comments and Responses

Comment BC 1 – It appears to us (based on our comments immediately below) that it also requires a Conditional Use Permit ("CUP") according to the City of Los Angeles Municipal Code.

Response BC 1 – Direct Disposal has a Certificate of Occupancy to operate a "Recycling Material Sorting Facility" at 3720 Noakes Street. A recycling material sorting facility is defined as a "facility which accepts commingled or source-separated Recyclable Materials of various types, which are separated on the site using a manual or automated system. Under this definition, source-separated Recyclable Materials are those which are separated from the waste stream at their point of generation for the purpose of recycling. This may include baling or crushing operations for the purposes of efficiency of storage and transfer (volume reduction) but shall not include processing activities for other than temporary storage purposes. CDI material separated at the source (construction site) is classified as a recyclable material and MSW will be transferred and not processed. Refuse transfer stations are a permitted use in the M3 zone and there are no restrictions based on proximity to less intensive zoning designations. Recycling material sorting is not and will not be taking place at 3719 Noakes Street.

Comment BC 2 – There may be other permits required, and the MND is flawed in not identifying these anywhere in the document.

Response BC 2 – Other than the Solid Waste Facility Permit, all other permits necessary to operate the Direct Disposal facility are currently in place and were included in Appendix B "Draft TPR" Section 2.1 "Permits and Approvals" of the Draft IS/MND or Appendix H of this errata.

The following permits are in place:

- **Land Use Permit –** The facility has Certificates of Occupancy from the City of Los Angeles for a recycling materials sorting facility with outdoor storage of materials and parking at 3720 and 3719 Noakes Street. Reference Use of Land Permits 16016-20000-24736, 16020-20001-03077 and 16020-20001-03078.

- **City Non-Disposal Facility Element (NDFE)** – In July 2006, the City Council of Los Angeles, CA added the Direct Disposal C&D facility to the City of Los Angeles's NDFE. The Direct Disposal NDFE was amended in June of 2018 to allow transfer and processing of up to 1,000 TPD of solid waste (reference NDFE Facility #85)

- **Storm Water Permit** - The facility has a General Industrial Storm Water Permit (NPDES) with the State Water Resources Control Board (SWRCB), WDID# 4 191019849. A Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program Plan (MPP) have been developed in compliance with State requirements.

- **Hazardous Waste Generator ID Number** - The facility has obtained a State Site Specific Identification number from the Department of Toxic Substances Control: CAL000284659. This number is used for all manifesting, record keeping, and reporting required for hazardous materials discovered through the load-checking program.

Comment BC 3 – The Notice of Availability and the MND describe the Project site as 3720 Noakes Street, Los Angeles, CA, but this is not fully accurate, as the Project clearly anticipates the use of the site across the street at 3719 Noakes Street as a "staging area," *see, e.g.,* TPR, attached to MND, at 6 (Figure 4) (PDF at 79), for vehicle queuing, container storage and parking (functions it is currently performing at the lower 175 tpd authorization currently held). Indeed, the MND states that:

> Future improvements may also include a vehicle queuing lane, a truck scale, scale-house and offices at the 3719 Noakes Street property which will free up additional space at 3720 Nokes [sic] Street form [sic] material storage and processing.

Response BC 3 – The property located at 3719 Noakes Street is currently permitted and used by Direct Disposal, Inc. for outdoor storage, employee parking, and parking company trucks. Sorting and/or storage of solid waste is not taking place, or is planned to take place, on the 3719 Noakes Street property.

The Corrections and Modification Section, page CM-1 of the Final IS/MND or Section 1 page 4 of this errata, revises Section 1.6, "Proposed Project" paragraph 4, to eliminate vehicle queuing and a future scale/scale house at 3719 Noakes Street. In addition, Corrections and Modification Section, page CM-2 of the Final IS/MND or Section 1, page 5 of this errata, revises **Figure 2** to include a note that no storage or processing of solid waste will be permitted at the 3719 Noakes Street site.

Comment BC 4 – MND at 3 (PDF at 6). These latter functions are not apparently evaluated in the MND at all and therefore Direct Disposal's pursuance of them (with the Local Enforcement Agency's apparent tacit approval) would violate CEQA, if not other laws. But the larger point is that an environmental impact report ("EIR") should have been prepared because if the site description had properly included 3719 Noakes Street, as the TPR does, *see* TPR at 1 (PDF at 74),2 there would be *more* than a fair argument that a significant impact on the environment could occur, because the Project involves more than 100 trucks per day visiting these two sites within 1,000 feet of residences, and that is the threshold for further review (and for required changes in a project) as set forth in the California Air Resources Board's ("ARB's") *Air Quality and Land Use Handbook* (2005) (a copy of which is provided as Attachment A hereto). *See* ARB, *Air Quality and Land Use Handbook* at 15. *See also* TPR at 8 (PDF at 81) (Table 2, describing "Facility Traffic" as 224 "Vehicles Per Day," including 148 Inbound Vehicles, and 22 Outbound Vehicles, all of which would be trucks). It seems apparent to us that Direct Disposal, the Local Enforcement Agency, and their CEQA consultant, Clements Environmental, must have been aware of this basic fact and deliberately excluded 3719 Noakes Street from the 1,000 foot review included in the MND at 10 (MND igure 6) (PDF at 13), and in the TPR at 4 (TPR Figure 4) (PDF at 77), for, as the MND acknowledges, there is residential development 1,010 feet from the "Project" if one excludes 3719 Noakes Street from the Project definition. *See* MND at 20 (Figure 7) (PDF at 23).

Response BC 4 – Solid waste activities are restricted to 3720 Noakes Street and there will not be any processing or storage of solid waste at 3719 Noakes Street. The use of 3719 Noakes Street for queuing has also been eliminated from the proposed project.

The "Air Quality and Land Use Handbook: A Community Health Perspective" was not intended to be used for evaluating CEQA impacts, but was intended to guide the location of sensitive land uses away from freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities.

The California Air Resources Board (CARB) is responsible for developing statewide programs and strategies to reduce the emission of smog-forming pollutants and toxics by mobile sources such as the solid waste collection vehicles currently using and anticipated to use the facility in the future. Limits on emissions from mobile sources are set by the CARB.

The CARB initially adopted the solid waste collection vehicle (SWCV) regulation in 2004 requiring all diesel SWCV's with 1960 to 2006 engines and a GVWR over 14,000 lbs. to be retrofitted with particulate matter (PM) filters by December 31, 2010. Current regulations mandate that by January 1, 2023, nearly all trucks and buses will be required to have 2010 or newer model year engines to reduce particulate matter (PM) and oxides of nitrogen (NOx) emissions. To help ensure that the benefits of this regulation are achieved, starting in 2020, only vehicles compliant with this regulation will be registered by the California Department of Motor Vehicles (DMV).

The draft IS/MND did not find any potential for the project to adversely impact environmental health and safety with adoption of proposed mitigation measures. In response to the comment, an air quality analysis has been prepared and included in the Final IS/MND based on the California Emission Estimator Model (CalEEMod) version 2016.3.2 and use of the AQMD's "Off-Road – Model Mobile Source Emission Factors". Detailed worksheets are included in **Appendix CM-I** of the Final IS/MND. The air quality analysis did not result in any new impacts or mitigation measures.

It should be noted that Table 2 of the TPR provides an overview of traffic at 500 TPD based on one-way trips to the facility. The Draft IS/MND is based on the proposed 326 TPD increase in permitted throughput and the resulting increase in inbound and outbound trips during the AM and PM peak hours to determine potential traffic impacts.

The increase in permitted throughput from the 175 TPD to 500 TPD would generate an additional 274 daily vehicle trips (137 inbound and 137 outbound), a total of 14 AM peak hour trips (7 inbound and 7 outbound) and 10 PM peak hour trips (5 inbound and 5 outbound). No traffic impacts are anticipated as a result of the proposed increase in permitted tonnage and no traffic study is required based on the City of LA DOT Guidelines which require preparation of a Technical Memorandum if a project will add between 25 to 42 a.m. or p.m. peak hour trips, and the adjacent intersections are presently estimated to be operating at LOS E or F. The City Department of Transportation reviewed the project and determined that neither a traffic impact analysis or access/circulation study are not required.

Comment BC 5 – We'd like to know what notice regarding this Project has been provided to the residents on Los Palos Street, Prada Street, and La Puerta Street, and in what languages that notice was provided.

Response BC 5 – The notice was mailed to all owners and tenants within 500 feet of 3720 Noakes Street in English and Spanish and included occupants and owners on a portion of Los Palos Street. The notification radius did not encompass any properties on Prada Street or La Puerta Street.

Comment BC 6 – The second reason why the mislabeling of the Project as only involving 3720 Noakes Street is of concern is that the MND acknowledges that the Los Angeles Municipal Code ("LAMC") requires a CUP for a Recycling Materials Sorting Facility in an M3 Zone if the facility is less than 1,000 feet from an A, R, C, P, or PB zoned property. MND at 9 (PDF at 12), *citing* LAMC § 12.21A18(e). The "Facility," as reflected in the TPR (as well as, apparently, the City's Certificates of Occupancy noted at TPR page 9 (PDF at 82)), includes 3719 Noakes Street, and therefore a CUP is required. Additionally, the facility is operating 24 hours per day and therefore requires a CUP because it is less than 1,000 feet from an R zone.

Response BC 6 – The Direct Disposal recycling materials sorting facility is located at 3720 Noakes Street and meets the requirements of 12.21 A 18 (e). The facility has a valid certificate of occupancy (C of O) to operate as a recycling material sorting facility, and was been inspected by the Los Angeles Department of Building and Safety prior to issuance of the C of O. In addition, the Direct Disposal facility is inspected by the Local Enforcement Agency, which is part of the LADBS, on a monthly basis for compliance with local and State regulation. No recycling materials sorting is taking place on the 3719 Noakes Street property. 3719 Noakes Street will not be included in the Solid Waste Facility Permit.

Comment BC 7 – We also note that the MND's citation to LAMC section 12.21A18(e) appears to be inaccurate because that section covers "Recycling Materials Sorting Facilities," at which "no processing of Recyclable Materials" "shall be permitted." LAMC *§* 12.21A18(e)(3); the present facility shreds and "processes" "Recyclable Materials" and therefore does not qualify. It would appear that the facility would be addressed by LAMC section 12.21A18(f), for "Recycling Materials Processing Facilities," but that it still would not qualify without obtaining a CUP because under subdivision (f):

> notwithstanding any other provisions of the Code, Recyclable Materials collected and processed on the site shall be limited to paper, cardboard, glass, metal, plastic and other items that are deemed appropriate by the Department of Building and Safety, Bureau of Sanitation, and Fire Department.

Response BC 7 – Direct Disposal facility recovers and recycles metal, plastic, wood, drywall, and inert materials. The facility is certified by the City of Los Angeles Bureau of Sanitation as diverting 77 percent of the material received from disposal in landfills. The facility has a valid certificate of occupancy from the Department of Building and Safety and a solid waste facility permit from the Local Enforcement Agency. Since the facility is more than 1,000 feet from a, R, C, P, or PB Zone or use.

Comment BC 8 – LAMC § 12.21A18(f)(3). The facility does not qualify because it now proposes to handle MSW. While LAMC section 12.03, Definitions, provides that Recyclable Materials may contain "yard waste," it does not provide for the handling of MSW. Additionally, while. we do not have time to parse. all the requirements of the LAMC right now, we have difficulty believing that a new transporter or handler of MSW would not be subject to a CUP or some other type of permit.

Response BC 8 – "Refuse Transfer Stations" are specifically permitted by right in the M-3 zone as set forth in the City's "Zoning Use List No. 2".

Comment BC 9 - MND at 7 (PDF at 10), Figure 4, includes a low-resolution image of a map of Los Angeles Area Community Plans. The resolution does not permit us to determine how the Project site is designated.

Response BC 9 – A better quality reproduction of the Los Angeles Area Community Plans map has been included in the Clarifications and Modifications Section, page CM-5 of the Final IS/MND or Section 1 page 8 of this errata.

Comment BC 10 - MND at 8 (PDF at 11) contains a Boyle Heights Community Plan map which is not much better. Again, we hope the residents in the close-by low density multifamily housing were served with notice by mail in their own first languages.

Response BC 10 – A better quality reproduction of the Boyle Heights Community Plan map has been included in the Clarifications and Modifications Section, page CM-6 of the Final IS/MND or Section 1 page 9 of this errata. Notices were provided to all tenants and property owners within 500-feet of 3720 Noakes Street where the Large Volume Solid Waste Facility Permit is being requested.

Comment BC 11 - MND at 9 (PDF at 12) indicates that the facility has been a "medium volume solid waste transfer and processing facility" since 2008. However, page 3 of the MND (PDF at 6) indicates that the current permit is for a 175 tpd "Medium Volume Direct Disposal Construction, Demolition and Inert Material Recovery Facility (MRF)," which would appear to exclude permission to transfer MSW and organic wastes. This is a significant change. We believe the MND is materially misleading in this respect.

Response BC 11 – The Final IS/MND has been revised to reflect the fact that the existing Solid Waste Facility Permit is for a Medium Volume Construction, Demolition and Inert (CDI) material recovery facility. See Comments and Modifications Section, page CM-7. The addition of MSW transfer was discussed and analyzed in the draft IS/MND.

Comment BC 12 - The TPR at 9 (PDF at 82) states under the bullet point "Environmental Documentation" that a Mitigated Negative Declaration and Notice of Determination "was [sic] adopted by the Local Enforcement Agency on June 7, 2019." We have reviewed the City's legal notices for MNDs going back to January 31, 2019, *see* https://planning.lacity.org/eir/publication/mnd pub.htm, and have seen no reference to this Project. Additionally, a MND may only be approved, and a Notice of Determination adopted, *after* there has been public review of the MND, which has not been completed in the case of this MND at this

point. *See* Pub. Res. Code§ 21152(a) (providing for filing of notices of determination with the county clerk "within five working days **after the approval or determination becomes final)** (emphasis supplied); The filing of a Notice of Determination would therefore be illegal under CEQA both under the· terms of section 21152, **and** because it would discourage public comment on the Project by falsely suggesting to potential commenters that the Project was a *fait accomplis,* which is opposite to CEQA's purposes.

Response BC 12 – The TPR was circulated as a draft document. It is provided as an informational item to assist in the public review process. The MND approval date was used as a place holder. A Notice of Determination (NOD) had not been prepared for the project at the time the Draft IS/MND was circulated, and there would not be any notice on the City Planning website if one had been adopted since the LEA is the Lead Agency, not City Planning. There have not been any actions that discourage public comment on the Draft IS/MND. The NOD has been prepared and is included in the Final IS/MND.

Comment BC 13 - We went to the website where the Local Enforcement Agency ("LEA") made the MND available, *see* https://www.ladbs.org/services/core-services/code-enforcement/leainformation and note that it nowhere gave members of the public notice as to when comments on the Project were due under CEQA, and simply provides a short description and a link to the MND. We had to go to the Office of Planning and Research's ceqanet database in order to figure out what the deadline was. We think this lack of clarity is similarly contrary to CEQA's purposes.

Response BC 13 – Comment noted. Interested members of the public that visited the LEA website were directed there either by the public notices that were mailed to all property owners and residents within 500 feet of 3720 Noakes Street, or from a notice published in a general circulation newspaper (The Downtown News). Notices were also mailed to elected officials and community groups. Both the mailed and published notices included the dates of the comment period.

Comment BC 14 - The TPR at 13 (PDF at 86) indicates that MSW will be transferred within 48 hours but that if it is not transferred within 24 hours, it will be containerized, which more than likely means it will be stored at 3719 Noakes Street, which again means that a CUP is required.

Response BC 14 – Solid waste storage or processing will not be permitted at 3719 Noakes Street. The TPR provides that "containerized material will be stored within the project site boundaries in transfer trucks." The project is a request for a Large Volume Solid Waste Facility Permit which is only applicable to the property at 3720 Noakes Street. All waste, including any residual waste from the C&D material sorting process, is removed from the site within 48 hours of receipt or generation.

Comment BC 15 – With regard to Air Quality impacts, the MND reaches the conclusion that the Project "will not increase any criteria pollutant," and that, apparently, it will not expose sensitive receptors to substantial pollutant concentrations because "[t]he site is over 1,000 feet from residences and the nearest sensitive receptors." MND at 19 (PDF at 22). We find the MND's analysis inadequate on both points:

First, with regard to criteria pollutants, we note, as mentioned before, that the TPR says the Project will lead to a total of 224 vehicles per day, of which 170 will be trucks. *See* TPR at 8 (PDF at 81) (Table 2, describing "Facility Traffic" as 224 "Vehicles Per Day," including 148 "Inbound Vehicles," and 22 "Outbound Vehicles," described in footnote 1 as consisting of "Inbound Commercial Vehicles: 5 tons per load; Inbound Self-Haul Vehicles - 1 ton per load; [and] Outbound Trucks: 23 tons per load"). While some of the "Self-Haul Vehicles" may be small trucks, we anticipate they will all be trucks or else they will not be capable of transporting a ton of waste each. Attachment B to this letter is an updated Air Quality Impact Analysis for the Knox Business Park project in Riverside County, California. The Knox Business Park project Air Quality Impact Analysis appears to have been based on a total of 113 trucks idling per day (Attachment B PDF at 544, 546, 548, and 550), and the Project was expected to lead to emissions of oxides of nitrogen or NOx (which is a precursor to ozone or smog) in the amounts of 354.35 pounds per day in the summer and 369.16 pounds per day in· the winter. *See* Attachment B, letter at 2 (PDF at 2). This was in comparison to the South Coast Air Quality Management District ("SCAQMD") threshold of 55 pounds per day for operations, and thus yielded a significant impact, for which the applicant and the County of Riverside prepared an EIR. Based on this information, there is frankly no fair argument that the Project *does **not*** have a significant impact on the environment; and thus an EIR should have been prepared.

Response BC 15 – An air quality analysis has been prepared and included in the Final IS/MND based on the California Emission Estimator Model (CalEEMod) version 2016.3.2 and use of the AQMD's "Off-Road – Model Mobile Source Emission Factors". Detailed worksheets have been included in **Appendix CM-I** of the Clarifications and Modifications Section of the Final IS/MND or Appendix L of this errata.

The Draft IS/MND did not find any potential for the project to adversely impact environmental health and safety with adoption of proposed mitigation measures.

It should be noted as well that the Knox Business Park Project referenced by the commentator generated 1,158 trips per day comparted to the 274 additional trips associated with the Direct Disposal project.

Comment BC 16 – At first blush, the TPR appears inconsistent with the MND, which states in its traffic section that the Project will lead to "an additional 274 daily vehicle trips (137 inbound and 137 outbound)." MND at 35 (PDF at 38). However, we presume that the traffic analysis addresses "additional" trips due to the Project, meaning that there are apparently approximately 87 vehicles per day visiting the site presently; if so, this means that the ratio of vehicles presently to vehicles predicted at 500 tpd would be about 39%, which is roughly proportionate to the increased tonnage attributable to the Project (175/500 = 35%). Additionally, 61% of the trips would be new trips (274/448 is approximately 0.61).

Response BC 16 – Regarding traffic, Table 2 of the Draft TPR provides the total number of trucks anticipated to use the facility at the proposed permit capacity of 500 tons per day.

It should be noted that Table 2 of the TPR provides an overview of traffic at 500 TPD based on one-way trips to the facility. The traffic analysis included in the Draft IS/MND is based on the proposed 326 TPD increase in permitted throughput and the resulting increase in inbound and outbound trips during the AM and PM peak hours was used to determine potential traffic impacts.

Comment BC 17 – Regarding exposure of sensitive receptors to Toxic Air Contaminants ("TACs") such as Diesel Particulate Matter ("DPM"), since the Project involves more than 100 trucks per day, there would be an argument that the Project leads to a significant impact even if it *were* ***not*** less than 1,000 feet from the nearest sensitive receptors, but it *is.* Accordingly, more analysis of impacts was required, based on the advice of the ARB in the *Air Quality and Land Use Handbook,* as noted previously.

Response BC 17 – See Response BC 4 and BC15.

Comment BC 18 –Still concerning Air Quality, the MND concludes that there will not be any significant increase in odors at the site, even though the Project involves the new receipt of MSW and organic and green wastes. The LEA's bare assurances do not eliminate a fair argument of a significant impact.

Response BC 18 – MSW will be limited to 100 tons per day and will be removed from the facility within 48 hours of receipt. An odor control plan (included as Appendix E of the Appendix A in the Draft IS/MND) will be implemented to reduce the potential for adverse impacts, and contact information will be posted at the facility to allow neighbors to notify the facility operator and local regulators including the Local Enforcement Agency and Air Quality Management District if odors are detected in the area. An overhead misting system is being required as a mitigation measure, and with the introduction of odor neutralizing agents, will mitigate potential impacts to less than significant levels.

Comment BC 19 – Regarding Hazards and Hazardous Materials, the MND acknowledges at 27 (PDF at 30) that incidental hazardous wastes will arrive on site. The MSW stream ***will*** include hazardous wastes and the discussion and proposed mitigation measures are inadequate.

Response BC 19 – Hazardous waste materials are not accepted at the facility. However, the Draft IS/MND acknowledges that hazardous materials such as used oil, paint, batteries or other similar items may be found in waste delivered to the facility, and that adequate resources will be available to safely and remove, store and dispose of those items. The proposed mitigation measures are based on industry standards and serve to protect employees and the environment.

Comment BC 20 – Concerning stormwater from the site, the LEA acknowledges that it could initially violate water quality standards, but claims the impacts would be reduced to less than significant through compliance with Best Management Practices and the Industrial Storm Water General Permit. MND at 29 (PDF at 32). We are not so sanguine; litter cleaning will not prevent contact with storm water of the materials inside the bins, leaking containers, etc.

Response BC 20 – Stormwater standards are established as part of the facility's General Industrial Stormwater Permit and Direct Disposal provides all stormwater monitoring data to the State as

part of the "Stormwater Multiple Application and Report Tracking System" or SMARTS. Litter control and "best management practices" are seen as an effective means of preventing stormwater pollution. The purpose of testing and monitoring stormwater runoff is to determine what, if any pollutants, are contributing to stormwater contamination, determine the source or sources of that contamination and to develop specific mitigation measures as necessary.

Comment BC 21 – As to Land Use and Planning, the LEA asserts that the Project is developable "by right" such that there is no land use conflict. We disagree as noted above.

Response BC 21 – – "Refuse Transfer Stations" are specifically permitted by right in the M-3 zone as set forth in the City's "Zoning Use List No. 2".

Comment BC 22 – It is true that the Knox Business Park updated AQIA only addressed 113 trucks at Building D and the Project anticipated the development of a Building E as well; however, the AQIA still analyzed idling only at Building D and it still came up with a significant impact.

Response BC 22 – See Response BC 15.

Comment BC 23 – Regarding utilities and being served by a landfill with sufficient capacity, the MND is misleading in stating that the increase in use will only be to 400 tpd. (MND at 38, PDF at 41).

Response BC 23 – The Clarifications and Modifications Section revised Section 3.16.b "Utilities and Service System" as follows: "[t]he proposed project would increase the maximum daily tonnage from 175 TPD to 500 TPD", and would not result in any adverse impacts to landfill capacity as discussed. See MND-38 on page CM-10 of the Final IS/MND or Section 3.16.f on page 41 of this errata.

Comment BC 24 – We request that you advise us immediately when the responses to the comments on the MND are made available by mail and email at collins@blumcollins.com and bentley@blumcollins.com, and that we be placed on the list of parties to be notified of all actions relating to this Project under Public Resources Code section 21092.2. Please forward this request to the director of the LEA.

Response BC 24 – Comment noted. Responses to comments, notices and the Final IS/MND will be provided as requested.

STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

August 29, 2019

Jose Gutierrez
City of Los Angeles, Department of Building and Safety/LEA
221 N. Figueroa Street, Rm. 1250
Los Angeles, CA 90012

Re: Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project
SCH 2019079096 - Mitigated Negative Declaration

Dear Mr. Gutierrez:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. Commission's Rail Crossings and Engineering Branch (RCEB) is in receipt of the Mitigated Negative Declaration for the proposed Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project (Project). City of Los Angeles, Department of Building and Safety/LEA is the lead agency (City). C-1

The Project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow the expansion of an existing 175 ton per day (TPD) Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (reference Cal Recycle Solid Waste Facility Permit No. I 9-AR-1228) operated by Direct Disposal, Inc., located in the vicinity of Noakes Street crossing in the City of Los Angeles (CPUC No.003-3.58-C, DOT No. 811461Y). The proposed SWFP will allow processing and transferring up to 500 TPD of solid waste material. C-2

The crossing is currently equipped with Commission Standard 1-R (crossbuck sign on a post) warning signs. RCEB has concerns about the increased traffic volume due to the proposed development. Any development project adjacent to or near a railroad right-of-way should be planned with the safety of rail corridor in mind. New development projects may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include improvements to existing at-grade crossings. Examples of improvements may include, but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings. C-3

In addition, construction or modification of public crossings requires authorization from the Commission. RCEB representatives are available to discuss any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: http://www.cpuc.ca.gov/crossings. C-4

Jose Gutierrez
SCH 2019079096
August 29, 2019

If you have any questions, please contact Chi Cheung To at (213) 576-5766, or cct@cpuc.ca.gov.

Sincerely,

Chi Cheung To
Senior Utilities Engineer Specialist
Rail Crossings and Engineering Branch
Rail Safety Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov
Peggy Ygbuhay, pygbuhay@up.com

Comment C-1 – The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. Commission's Rail Crossings and Engineering Branch (RCEB) is in receipt of the Mitigated Negative Declaration for the proposed Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project (Project). City of Los Angeles, Department of Building and Safety/LEA is the lead agency (City).

Response C-1 – Comment noted. The proposed project does not require the construction or alteration of any rail crossings.

Comment C-2 – The Project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow the expansion of an existing 175 ton per day (TPD) Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (reference Cal Recycle Solid Waste Facility Permit No. l 9-AR-1228) operated by Direct Disposal, Inc., located in the vicinity of Noakes Street crossing in the City of Los Angeles (CPUC No.003-3.58-C, DOT No. 811461Y). The proposed SWFP will allow processing and transferring up to 500 TPD of solid waste material.

Response C-2 – Comment noted. The rail crossing serves an Archer Daniels Midland Company milling and grain storage facility.

Comment C-3 – The crossing is currently equipped with Commission Standard 1-R (crossbuck sign on a post) warning signs. RCEB has concerns about the increased traffic volume due to the proposed development. Any development project adjacent to or near a railroad right-of-way should be planned with the safety of rail corridor in mind. New development projects may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include improvements to existing at-grade crossings. Examples of improvements may include but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings.

Response C-3 – As shown in Appendix CM-II, the project does not exceed the City of Los Angeles Department of Transportation's threshold for preparation of a traffic study.

The Direct Disposal facility, as well as all the other businesses on Noakes Street, generate traffic and heavy truck trips that must contend with multiple rail crossings in the area. It appears that the majority of these are rail crossings are for spur lines serving specific businesses and are not part of larger rail corridors. The rail spurs are used on a limited basis, and the businesses utilizing the rail spurs have safety measures in place. Pedestrian access is limited since the area is served by heavy industrial uses, and there are no sidewalks. No bike lanes or designated bike routes are located in the area as well.

Comment C-4 – In addition, construction or modification of public crossings requires authorization from the Commission. RCEB representatives are available to discuss any potential

safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: http://www.cpuc.ca.gov/crossings.

Response C-4 – Comment noted. The proposed project does not entail modification of any public rail crossings.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
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Making Conservation a California Way of Life.

August 29, 2019

Jose Gutierrez
City of Los Angeles
Department of Building and Safety/LEA
221 N. Figueroa St., Rm.1250
Los Angeles, CA 90012

RE: Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project
Mitigated Negative Declaration (MND)
SCH# 2019079096
GTS# 07-LA-2019-02728
Vin. LA-5/ PM 15.063

Dear Mr. Gutierrez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow the expansion of an existing 175 ton per day (TPD) Medium Volume, Construction, Demolition and Inert (CDI) Material Recovery Facility (reference CalRecycle Permit no. 19-AR-1228) operated by Direct Disposal, Inc., and located at 3720 Noakes St. in the City of Los Angeles. The proposed SWFP will allow processing and transfer of up to 500 TPD of solid waste material. The 54, 136 square foot site is developed with a one-story, 12,200 square foot building that houses the tipping area and processing equipment including mechanical screens and an elevated sort line. The site also contains a truck scale and associated 600 sf scale house/office as well as outdoor storage areas. Off-site surface parking is provided at 3719 Noakes Street. No new floor area Is proposed.

The nearest State facility to the proposed project is Interstate 5. After reviewing the Mitigated Negative Declaration (MND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov or (213) 897-4230 and refer to GTS# 07-LA-2019-02728.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
Cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Comment CT-1 – The nearest State facility to the proposed project is Interstate 5. After reviewing the Mitigated Negative Declaration (MND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Comment CT-1 – Comment noted.

Comment CT-2 – As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Comment CT-1 – Comment noted. Other than the typical vehicles such as roll-off trucks, transfer trucks and end-dump trucks no oversized-transport vehicles that would require Caltrans oversized vehicle permits are anticipated to use the facility.

APPENDIX C

BLUM COLLINS LETTER DATED OCTOBER 19, 2020

BLUM | COLLINS LLP

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90017

213.572.0400 phone
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October 19, 2020

Jose Gutierrez
Environmental Supervisor
Local Enforcement Agency
221 N. Figueroa Street, 12th Floor
Los Angeles, CA 90012
jose.gutierrez@lacity.org

Via Email (with Attachments) and U.S. Mail (without Attachments)

Re: *Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project,* Final Mitigated Negative Declaration and Responses to Comments and Permitting

Dear Mr. Gutierrez:

This is to comment further under the California Environmental Quality Act ("CEQA") and otherwise on behalf of the Golden State Environmental Justice Alliance ("GSEJA") concerning the now-Final Mitigated Negative Declaration ("MND") for the Direct Dispsal Large Volume Solid Waste Transfer/Processing Facility Project. We note that the Local Enforcement Agency ("LEA") has apparently taken down all website links to the *Draft* MND which the Final MND refers to. This greatly complicates the public's review and does not comport with CEQA or public disclosure requirements in general.

Changes from the Draft MND

The Final MND purports to change the Draft MND in the following respects:

- The Final MND changes the Draft MND's Figure 2 to reflect that 3719 Noakes Street will no longer be a "vehicle staging area" and that no solid waste processing or storage will occur there. It is apparent that 3719 Noakes Street will still be used for "Roll-off Container Storage" and employee and truck parking. Therefore, the MND should have evaluated the impacts to the 3719 Noakes Street property and to residents within 1,000 feet of the 3719 Noakes Street property. Its failure to do this is contrary to CEQA and the California Air Resources Board's Land Use and Air Quality Handbook ("Handbook") which we previously forwarded to you. Contrary to the Response to Comments' statement, CARB's Handbook was *completely* developed to assist local land use agencies in conducting CEQA review, and we are attaching two of many, many examples we have in which the South Coast Air Quality Management District ("SCAQMD") has provided CEQA comments based on CARB's Handbook. *See* Exhibits A and B (page 2 in both Exhibits).

BC2-1

- The Final MND changes the Draft MND at page 9 to reflect that Direct Disposal has operated a medium volume *CDI* facility, *not* a "solid waste processing and transfer" material recovery facility. CDI is defined as "Construction, Demolition and Inert" materials. This is relevant because the introduction of solid (municipal) waste into the waste stream at the facility is likely to pose risks to neighbors.

BC2-2

- Section 3.3, Air Quality, was modified to reflect that the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation was significant without the incorporation of mitigation, although the agency continues to take the position that impacts will be less than significant based now on a CalEEMod analysis. See our comments below regarding the merits of that analysis.

BC2-3

- The Final MND is also revised to acknowledge that the Project will increase the number of vehicles accessing the site and the running times for off-road diesel powered equipment used at the facility. We are uncertain about the adequacy of the off-road diesel equipment CalEEMod analysis because we have not attempted to independently verify that analysis, but as we note below, it is clear that emissions will exceed the SCAQMD regional threshold for NO_x regardless. We also note that the LEA did ***not*** require the preparation of an HRA (Health Risk Assessment) relating to the off-road diesel equipment and truck use related to the Project. This is inadequate given the Project's location close to a number of sensitive residential receptors.

BC2-4

- The Final MND alters the Draft by acknowledging that the Project has the potential to lead to objectionable odors.

BC2-5

- The Final MND differs from the Draft by correcting an apparent typographical error at page 38 indicating that the permit would allow the facility to expand to a 500 ton per day municipal solid waste facility as opposed to a 400 ton per day municipal solid waste facility. The Final MND leaves in a comment that "Facilities such as this divert material from the landfill through recycling." We are uncertain whether the proposed Project is intended to divert MSW. While that may have been the function of the facility with respect to CDI, we don't think that is the function of an MSW facility.

BC2-6

<u>The Project's CalEEMod Analysis is Flawed</u>

At page 46 of the Final MND PDF, there is trip summary information indicating that the Project will have 273.78 trips per day for six days a week, which works out to 1642.68 trips per week or 85419.36 trips per year. The CalEEMod worksheets reflect annual VMT of 1,538,699 which means a trip length of about 18 miles per trip. In the first place, we do not see that the agency has any basis for concluding that the average trip length will be this short. Additionally, and more importantly, the Draft MND conceded that the Project will operate 24 hours per day, ***seven*** days per week, not ***six*** days per week. Final MND page CM-9 discloses that the Project is just barely under the NO_x threshold at 54.54743 pounds of NO_x per day, when SCAQMD's operational significance

BC2-7

threshold is 55 pounds per day. It is apparent that the agency or its consultant has "cooked the books" to try to reduce emissions below SCAQMD's regional significance standard.

The Final MND assumes a trip rate of 273.78 trips (average) for Saturdays and this number therefore needs to be applied to Sundays as well. When we do this, we discover that the agency and its consultant have underestimated the trip rate by 1/7, so total emissions would be as follows:

25.0742 lbs/day NO_x from on-road mobile emissions
Divided by 6 = 4.1790 lbs/day of NO_x
Added to 25.0742 = 29.2532 lbs/day of NO_x from on-road mobile emissions

With 29.2532 lbs/day of NO_x from on-road mobile emissions, the Project would have total emissions of approximately 58.72643 lbs/day of NO_x, which exceeds the SCAQMD threshold.

BC2-7 (cont.)

It's true our calculation is only relevant if CalEEMod relies on the annual VMT number to calculate NO_x, as opposed to a daily figure, but we are relatively confident that that is the case or else there would have been no reason to calculate annual VMT.

We also note that the ***Draft*** MND does not posit ***any*** construction for the Project, whereas the CalEEMod analysis in the ***Final*** MND appears to contemplate ***construction emissions*** from both demolition and construction. The construction emissions of diesel equipment, assuming there are any, and apparently there are, should have been evaluated in a construction Health Risk Assessment. Again, this was not done.

Responses to April Fitzpatrick Comments

The LEA wholly abdicates its responsibilities to local residents in its response to April Fitzpatrick's comment that the roads are not in good condition by telling Ms. Fizpatrick that she has to contact the Bureau of Street Services to address the question herself, even though it is clearly Direct Disposal's. This is offensive. LEA is a part of LADBS which is part of the City of Los Angeles, and the responsibility is that of the City of Los Angeles. We'll probably follow up if you won't, but it probably won't be in a way you want.

BC2-8

Ms. Fitzpatrick has also commented that Direct Disposal customers/transporters come to the Direct Disposal Facility at an excessively high rate of speed, and that the trucks deposit trash, nails, and metal pieces and wood which damage tires. The fact that there must be tarps on trucks does not mean that they do not deposit these items on local streets, and apparently, cleanup efforts are not adequate. It is also impossible for Ms. Fitzpatrick to develop the conclusive evidence you demand to prove that the materials on the streets came from Direct Disposal operations but it is highly likely that they do.

BC2-9

Ms. Fitzpatrick also has concerns regarding dust. The fact that SCAQMD has been called out before and has not ***cited*** the developer does not mean there is not a problem. We're sure SCAQMD gives businesses the opportunity to address identified issues. BC2-10

With respect to Ms. Fitzpatrick's suggestion that the Project's impacts be mitigated by full enclosure of Direct Disposal's operations, we note that the Municipal Code provides that there should be a concrete block wall around the facility, and a five-foot landscaped buffer, whether it is considered a "Recycling Materials Sorting Facility" or a "Recycling Materials Processing Facility," and apparently this is not presently the case for some reason.[1] BC2-11

Ms. Fitzpatrick also notes that there is particulate matter (dust) coming from the fact that trucks park on the unpaved sides of the roads, and the LEA responds that this is not its problem. We're not sure the LEA's CalEEMod analysis adequately addressed this source of PM_{10} and $PM_{2.5}$. Again, whether Direct Disposal is responsible for this paving or not, a City entity is, and nothing has been done about it. BC2-12

We also note that, with respect to Ms. Fitzpatrick's comment on dust and debris from the rail line nearby, that the LEA did not conduct a cumulative impacts analysis, contrary to CEQA. BC2-13

Responses to Blum Collins' Comments

In response to our Comment BC-3 and BC-4, the LEA asserts that the Project site is 3720 Noakes Street, but this is not fully accurate for CEQA purposes, which would include vehicle parking. The purpose of CEQA is to review "the whole of an action," which the MND does not do. The increased tonnage, traffic and increased waste and waste streams will impact local residents within 1,000 feet of both sites. It matters not whether sorting occurs at 3719 Noakes Street. BC2-14

As we already stated above, the ARB's Air Quality and Land Use Handbook is used and should be used in evaluating CEQA impacts. Further, the LEA has failed to prepare a Health Risk Assessment with respect to either construction or operation of the Project. *See* the Handbook at 15: "Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day . . .)." BC2-15

[1] We also note that Los Angeles Municipal Code section 12.19A4(b) says noise cannot exceed the levels provided in section 111.03 of the Code as measured from any point on the adjacent property in an A, R, C, P, or M zone. Ms. Fitzgerald's company may have a claim against Direct Disposal under this provision. Sectioon 12.19A4(b) further provides that the use must be conducted within an enclosed building or within a solid fence not less than eight feet in height (this does not derogate from the more specific block wall requirement set forth in 12.19A18(e) or (f)), that there must be ***paved*** off-street parking, which apparently is not the case for all trucks visiting the Project site presently, and again that there must be landscaping.

In Comment BC-5, we asked whether notice was given to nearby residents on Los Palos, Prada, and La Puerta Streets. The response was that it was only given to residents within 500 feet of 3720 Noakes, not 3719. Again, this is insufficient. The Public Resources Code requires notice to owners and occupants of contiguous property. Presuming that includes notice to properties contiguous to 3719 Noakes, and that that means properties on the other side of the street, notice should have gone much further than it did. BC2-16

In Comment BC-6, the MND acknowledges the need for a CUP for a Recyling Materials Sorting Facility in an M-3 Zone if the Facility is less than 1,000 feet from an A, R, C, P or PB zoned property. The Facility, as reflected in the TPR, includes 3719 Noakes Street. Also, the Facility is operating 24 hours per day and requires a CUP because it is less than 1,000 feet from an R zone. With all due respect, whether 3719 Noakes Street involves recycling materials sorting or not, the MND should have evaluated it because it is used for some functions. BC2-17

In Comment BC-7, we noted that LAMC section 12.21A18(e) does not apply because it only covers Recycling Materials *Sorting* Facilities at which no processing is permitted. The present Facility shreds and processes recyclable materials and should have been permitted under section 12.21A18(f) instead, and it would require a CUP. While the LEA contends that the Project is more than 1,000 feet away, this excludes the 3719 Noakes Street portion of the Project site. BC2-18

The LEA asserts that "Refuse Transfer Stations" are specifically permitted by right in the M-3 zone as set forth in the City's "Zoning Use List No. 2." We've downloaded Use List No. 2, and it says under paragraph B "Refer to appropriate section of Code for special restrictions or conditional use right applicable to many of the following uses." There is no indication as a result of that List that any use is permitted as of right. *See* Exhibit C. BC2-19

In BC-11 we noted that the Draft MND stated that the Facility has been a "medium volume solid waste transfer and processing facility" since 2008. Whether or not this point was clarified in the Final MND, this is not enough. The City has hardly sent the Final MND and Responses to Comments to a wide readership. BC2-20

In BC-12 we noted that the Draft MND was fundamentally misleading in including the statement in the TPR that the MND was already adopted. This likely deterred (and was calculated to deter) commenters by making the public think that the Project was already approved. The LEA said in response that people came to the MND either through the notices or the newspaper notice. That's not how we got to it. And there should have been far more publication than there was. BC2-21

We also commented that the LEA's website nowhere indicated when comments were due. This is insufficient under CEQA. Additionally, we note that the "general circulation" newspaper the LEA used hardly appears to be a "general circulation" newspaper for the area, having a minimum circulation, and this was likely intentional on the LEA's part. Providing notice to residents and occupants within 500 feet and putting a BC2-22

notice in a newspaper is clearly the minimum notice the LEA could have provided under law.

BC2-22 (cont.)

In Comment BC-16 we noted that the TPR and the Draft MND were apparently inconsistent, because the Draft MND notes an "additional 274 daily vehicle trips (137 inbound and 137 outbound)," whereas the TPR indicated that the total number of trips anticipated was only 224. We ***tried*** to find an explanation for this discrepancy, but the Response to Comment fails to clarify the point in any way. This calls into question both the MND's Traffic Analysis and the CalEEMod operational analysis.

BC2-23

In Comment BC-18, we raised concerns re odors in the area from solid waste ("MSW"), organic and green wastes. The Response was that all MSW will be removed within 48 hours and an odor control plan will be implemented. The Response to Comment asserts that the odor control plan is included in Appendix E to Appendix A to the Draft IS/MND. We were unable to access that odor control plan because the Draft IS/MND was ***taken down by the LEA.*** The Response further states that there will be an overhead misting system with "odor neutralizing agents." This plan is not reflected in the TPR, which we do have. In this connection, we also note that the LEA has failed to post its updated Mitigation Monitoring and Reporting Program ("MMRP") with the Final MND, contrary to CEQA. Further, we do not see where in the MMRP that MSW will be limited to 100 tons per day.

BC2-24

We commented in BC-20 that compliance with Best Management Practices and the Industrial Storm Water General Permit would not necessarily reduce water quality impacts from runoff to less than significant levels. The LEA responded that Direct Disposal participates in a Stormwater Multiple Application and Report Tracking System ("SMARTS") to determine sources of contamination and track that contamination. The System is not described, and it appears to involve after-the-fact measures, indicating that stormwater will be polluted regardless of tracking.

BC2-25

We have already reiterated our concern that the Project cannot be developed "by right" and that the City's Zoning List No. 2 does not provide that authority, as Exhibit C discloses.

BC2-26

<u>California Public Utilities Commission Comments</u>

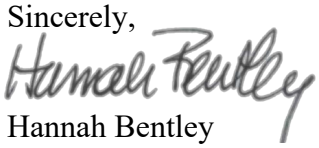
LEA's response to California Public Utilities Commission Comment C-3 is dismissive and inadequate. As the Commission states, "Traffic impact studies should analyze rail crossing safety and potential mitigation measures." Whether the Los Angeles Department of Transportation has said that a traffic study is not necessary because the Project won't generate am and pm peak trips above the DOT's threshold does not address the Commission's point that upgrading of the crossing, warning devices, warning surfaces, and edge lines on sidewalks and pedestrian channelization may be appropriate.

BC2-27

Conclusion

Thank you for your attention to these comments. We look forward to participating in the LEA's consideration of the Proposed Project via Zoom on October 22. Please keep us informed of all developments on the Project. BC2-28

Sincerely,



Hannah Bentley
Of Counsel
BLUM COLLINS, LLP

Exhibits A, B & C: Included with emailed copy

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
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SENT VIA E-MAIL: April 7, 2020

EdgardoC@CityofFullerton.com
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303 W. Commonwealth Avenue
Fullerton, CA 92832

Notice of Preparation of a Draft Environmental Impact Report for the Proposed Goodman Logistics Center Fullerton Project[1]

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Draft EIR upon its completion and public release. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Draft EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[2]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results

[1] The Proposed Project would include construction of 1,561,522 square feet of warehouses on 73.1 acres.

[2] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

Operation of the Proposed Project generates or attracts heavy-duty diesel-fueled vehicles. It is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance[3] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions, and that the Orange County has the greatest cancer

[3] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

risk at 315 in one million, and individual communities could have higher risks than the average if they are located near emission sources[4]. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks. Thus, cumulative impacts from warehouse projects in communities with existing industrial sources should be evaluated and disclosed.

Trip Rates for High Cube Warehouse Projects

The Proposed Project will include, among others, construction of construction of 1,561,522 square feet of warehouses on 73.1 acres. South Coast AQMD staff recommends the use of truck trip rates from the Institute of Transportation Engineers (ITE) for high cube warehouse projects located in South Coast AQMD (i.e. 1.68 average daily vehicle trips per 1,000 square feet and 0.64 average daily truck trips per 1,000 square feet). Consistent with CEQA Guidelines, the Draft EIR for the Proposed Project may use a non-default trip rate if there is substantial evidence supporting another rate is more appropriate for the air quality analysis.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD'S *CEQA Air Quality Handbook*. South Coast AQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- California Air Pollution Control Officers Association (CAPCOA)'s *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Additional mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that vendors, contractors, and/or haul truck operators commit to using 2010 model year[5] trucks (e.g.,

[4] South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Accessed at: http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf.

[5] The CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter

material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks[6]. Include environmental analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. The Lead Agency should include the requirement of zero-emission or near-zero emission heavy-duty trucks in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this land use or higher activity level.
- Should the Proposed Project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)[7]. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, South Coast AQMD staff recommends the Lead Agency require the Proposed Project and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, South Coast AQMD staff recommends that the Lead Agency require at least five percent of all vehicle parking spaces (including for trucks) include EV charging stations[8]. Further, electrical hookups should be

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requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

[6] Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf (See slide #23).

[7] Southern California Association of Governments. Accessed at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

[8] City of Los Angeles. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.
- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the Proposed Project such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.
- Design the Proposed Project to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the Proposed Project where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the Proposed Project and sensitive receptors.

Additional mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy including solar panels.
- Install the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility and/or EV charging stations.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Alternative

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and South Coast AQMD Rules

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project. The assumptions in the air quality analysis in the Final EIR will be the basis for permit conditions and limits. For more information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2001. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: http://www.aqmd.gov.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
ORC200402-01
Control Number

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL: April 16, 2019

sking@ci.norco.ca.us
Steve King, Planner Director
City of Norco, Planning Department
2870 Clark Avenue
Norco, CA 92860

Notice of Preparation of an Environmental Impact Report for the Proposed Palomino Business Park

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[1]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air

[1] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance[2] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

[2] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD'S *CEQA Air Quality Handbook* South Coast AQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

If the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and South Coast AQMD Rules

If the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for permit conditions and limits. For more information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: http://www.aqmd.gov.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
RVC190402-02
Control Number

CASE NO. ZA 2003-4842 (ZAI)

LIST NO. 2 OF USES PERMITTED IN VARIOUS ZONES IN THE CITY OF LOS ANGELES
(Breakdown by Alphabetical Order)

Corrected to and including Ordinance No. 174,999, effective January 15, 2003.

Notes: A. All retail stores, shops or businesses shall be limited to less than 100,000 square feet of floor area.

B. Refer to appropriate sections of Code for special restrictions or Conditional Use right applicable to many of the following uses.

C. Accessory uses and uses permitted by exception are not included.

D. This list is for quick reference only. For a more accurate list indicating qualifications, limitations or restrictions, use the list by Zones or refer to Sections 12.03 through 12.28 of the Zoning Code.

E. This list is corrected to an includes Ordinance No. 174,999, effective December 18, 2002.

- A -

M2 and M3.

Adding Machine Repair - C1.5, C2, C5, CM, M1, M2 and M3.

Adhesive Manufacturing, liquid - M2 and M3.

Addressograph Service - C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Adult Bookstore (restrictions) - C2, C4, C5, CM, M1, M2 and M3.

Adult Cabaret (restrictions) - C2, C5, CM, M1, M2 and M3.

Adult Education Classes - RA, RE, RS, R1, R2, RD, R3, R4 and R5.

Adult Motel (restrictions) - C2, C4 and C5.

Adult Motion Picture Theater (restrictions) - C2, C4, C5, CM, M1, M2 and M3.

Abrasives Manufacturing - M3.

Accessory Building (to permitted use) - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Accessory Living Quarters - A1, A2, RA, RE, RS, R1, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5 and CM.

Accessory Uses - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Acetelyne Gas Manufacturing or Storage - M3.

Acid Manufacturing (restrictions) - M3.

Acupuncturist, Accupressurist's Office - CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1,

Adult Theater (restrictions) - C2, C4, C5, CM, M1, M2 and M3.

Advertising Signs, statuary or structures, on-site only - C2, C4, C5, CM, M1, M2 and M3.

Advertising Structures Manufacturing - MR1, MR2, M1, M2 and M3.

Advertising Studio - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Aerosol Packaging - M1, M2 and M3.

Agar-Agar Manufacturing - M3.

Agricultural Equipment Sales Yard, wholesale - MR2, M2 and M3.

Agricultural Uses - PF, A1, A2, RA, MR1, MR2, M1, M2 and M3.

Air Conditioning Equipment Service - C1.5, C2, C5, CM, M1, M2 and M3.

Aircraft Engine or Aircraft Parts Repairing, reconditioning or rebuilding - M1, M2 and M3.

Aircraft Engine Testing - M2 and M3.

Aircraft Factory - MR2, M2 and M3.

Aircraft Fueling Station - M2 and M3.

Aircraft Hangar - M2 and M3.

Aircraft Landing Field - M2 and M3.

Aircraft Repairing - M2 and M3.

Airport - M2 and M3.

Alcohol Manufacturing - M3.

Alligator Farm - M2 and M3.

Alzheimer's/Dementia Care - R5, CR, C1, C1.5, C2, C5.

Ammonia Manufacturing - M3.

Ammunition Manufacturing (restrictions) - M3.

Animal (small) Breeding and Boarding - MR1, MR2, M1, M2 and M3.

Animal (large) Breeding and Boarding - MR2, M2 and M3.

Animal Hospital - MR1, MR2, M1, M2 and M3.

Animal Keeping, domestic - A1, A2, RA, RE, RS, R1, R2, RMP, R3, R4, R5, MR2, M2 and M3.

Animal Keeping, wild (see definition of Accessory Use) - M2 and M3.

Animal Raising - A1, A2, MR2, M2 and M3.

Animal Stock Yard or Feeding Pen - M3.

Animated Cartoon Studio - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Anti-Knock Compound for gasoline, manufacturing of - M2 and M3.

Antique Shop - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Apartment Hotel (see Hotel).

Apartment House - RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Apiary (bee raising) - A1, A2, MR1, MR2, M1, M2 and M3.

Appliance Rental, household - C2, C5, CM, M1, M2 and M3.

Appliance Repair, household - C1.5, C2, C5, CM, M1, M2 and M3.

Appliances, secondhand, storage display, processing or sales - M2 and M3.

Aquarium - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Archery Range - C2, C5, CM, M1, M2 and M3.

Architect's Office - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Arena (maximum 3,000 seating capacity) - C2, C5, CM, M1, M2 and M3.

Arena (unlimited seating capacity) - M1, M2 and M3.

Arsenal - M3.

Art Gallery - C1.5, C2, C4, C5, M1, M2 and M3.

Art School - CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Art Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Asbestos Processing or Grinding - M3.

Asbestos Products Manufacturing - M1, M2 and M3.

Asphalt Manufacturing or Refining - M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Asphalt Roofing Paper or Shingle Manufacturing - M3.

Assaying - CM, MR1, MR2, M1, M2 and M3.

Assisted Living - R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM.

Astronomical Observatory - C2, C4, C5, CM, M1, M2 and M3.

Athletic Field - OS, C2, C5, CM, M1, M2 and M3.

Auction House - C2, C5, CM, M1, M2 and M3.

Auction, open air - M2 and M3.

Auditorium (maximum 3,000 seating capacity) - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Auditorium (unlimited seating capacity) - M1, M2 and M3.

Auto Ride Amusement - C2, C5, CM, M1, M2 and M3.

Automobile Club - C2, C4, C5, CM, M1, M2 and M3.

Automobile Dismantling Yard - M2 and M3.

Automobile Display Room - C2, C4, C5, CM, M1, M2 and M3.

Automobile Impound Yard - M2 and M3.

Automobile Laundry (see Car Wash).
Automobile Parking -A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Automobile Parts - C2, C4, C5, CM, M1, M2 and M3.

Automobile Parts, repairing or rebuilding for wholesale - MR1, MR2, M1, M2 and M3.

Automobile Parts, used, storage of - M3.

Automobile Race Track - M3.

Automobile Rebuilding or Reconditioning, wholesale - MR1, MR2, M1, M2 and M3.

Automobile Rental - C2, C5, CM, M1, M2 and M3.

Automobile Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Automobile Sales, used - C2, C5, CM, M1, M2 and M3.

Automobile Storage Area - C2, C5, CM, M1, M2 and M3.

Automobile Storage Garage - C2,C5, CM, M1, M2 and M3.

Automobile Wrecking - M2 and M3.

Automotive Assembly, wholesale - MR1, MR2, M1, M2 and M3.

Automotive Body and Fender Repairing (restrictions) - C2, C4, C5, CM, M1, M2 and M3.

Automotive Body and Fender Repairing, wholesale - M1, M2 and M3.

Automotive Body and Frame Manufacturing - M3.

Automotive Exhaust Test Station - C2, C5, CM, M1, M2 and M3.

Automotive Glass Shop (see Automotive Repair).

Automotive Painting - C2, C5, CM, M1, M2 and M3.

Automotive Painting, wholesale - M1, M2 and M3.

Automotive Repair (restrictions) - C2, ~~C4,~~ C5, CM, M1, M2 and M3.

Automotive Service Station - C2, C5, CM, M1, M2 and M3.

Automotive Sound Shop (see Automotive Repair).

Automotive Undercoat Spraying wholesale - M1, M2 and M3.

Automotive Upholstering - C2, C5, CM, M1, M2 and M3.

Automotive Upholstering, wholesale M1, M2 and M3.

Aviary (bird raising) - A1, A2, MR1, MR2, M1, M2 and M3.
Awning Assembly - CM, MR1, MR2, M1, M2 and M3.

Awning Manufacturing - MR1, MR2, M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Awning Store, no fabrication or assembly - C2, C5.

Awning Store - CM, M1, M2 and M3.

- B -

Babbitt Metal Manufacturing - M1, M2 and M3.

Bag Cleaning - MR2, M2 and M3.

Bag Storage, sorting, collection or baling - MR2, M2 and M3.

Bail Bond Broker - C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Bakery - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Bakery Goods Distributor - CM, MR1, MR2, M1, M2 and M3.

Bakery Goods Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Bakery Goods Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Bank - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Barber College - C2, C4, C5, CM, M1, M2 and M3.

Barber Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Barrel or Drum, steel, manufacturing or reclaiming of - M3.

Barrel Storage, empty - MR2, M2 and M3.

Barrels and Drums, secondhand, storage, display, processing or sale of - M2 and M3.

Baseball Batting Range or Cage - C2, C5, CM, M1, M2 and M3.

Baseball Field - OS, C2, C5, CM, M1, M2 and M3.

Baseball Stadium (maximum 3,000 seating capacity) - C2, C5, CM, M1, M2 and M3.

Baseball Stadium (unlimited seating capacity) - M1, M2 and M3.

Bath, Turkish and the like - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Bathing Cap Manufacturing - MR1, MR2, M1, M2 and M3.
Bathtub Manufacturing - MR1, MR2, M1, M2 and M3.

Batt Manufacturing - M2 and M3.

Battery Manufacturing - MR1, MR2, M1, M2 and M3.

Battery Rebuilding - M1, M2 and M3.

Battery Service - C2, C5, CM, M1, M2 and M3.

Battery Store - C2, C5, CM, M1, M2 and M3.

Beauty College - C2, C4, C5, CM, M1, M2 and M3.

Beauty Shop or Parlor - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Berry Crops - A1, A2, RA, MR1, MR2, M1, M2 and M3.

Beverage Manufacturing, alcoholic - M3.

Beverage Manufacturing, non-alcoholic - M1, M2 and M3.

Bicycle Rental - C2, C5, CM, M1, M2 and M3.

Bicycle Repair Shop - C2, C5, CM, M1, M2 and M3.

Bicycle Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Bicycle Sales, used - C2, C5, CM, M1, M2 and M3.

Billboard Manufacturing - MR1, MR2, M1, M2 and M3.

Billiard Parlor - C2, C5, CM, M1, M2 and M3.

Bingo - OS, PF, A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Bird Store - C2, C4, C5, CM, M1, M2 and M3.

Blacksmith Shop - MR1, MR2, M1, M2 and M3.

Blast Furnace - M3.

Bleach Manufacturing - M3.

Blending and Mixing of Compounds for case hardening, tempering - M2 and M3.

Blending and Mixing of Compounds for water softening, boiler cleaning - M1, M2 and M3.

Bloodmobile - RAS3, RAS4, P, PB, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Blueprinting - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Boarding Home for Aged, no medical or nursing care - RAS3

Boarding Home for Aged, with special care - R5, C1, C1.5, C2 and C5.

Boarding Home for Aged, with special care, philanthropic - R4, RAS4, R5, C1, C1.5, C2 and C5.

Boarding House, five or fewer guest rooms or light housekeeping rooms - RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Boarding House (hotel) - six or more guest rooms - R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Boat Building, small - MR1, MR2, M1, M2 and M3.

Boat Rental - C2, C5, CM, M1, M2 and M3.

Boat Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Boat Sales, used - C2, C5, CM, M1, M2 and M3.

Body and Fender Repairing, automotive (restrictions) - C2, C4, C5, CM, M1, M2 and M3.

Body and Fender Repairing, automotive, wholesale - M1, M2 and M3.

Boiler Works - M3.

Bolt Manufacturing - M3.

Bolt or Screw Thread Rolling or Cutting - MR2, M2 and M3.

Bone Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Boneblack Manufacturing - M3.

Book Bindery - CM, MR1, MR2, M1, M2 and M3.

Book Store, new - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Book Store, used - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Booster Pump Station with in-line heater system for oil pipeline - M2 and M3.

Booster Pump or Flow Control Station for public utility pipeline - C2, C5, CM, M1, M2 and M3.

Borrow Pit - M3.

Bottle Manufacturing - M3.

Bottle Washing, collection or storage - MR2, M2 and M3.

Bottling Plant - MR1, MR2, M1, M2 and M3.

Bovine Breeding, grazing, raising or training - MR2, M2 and M3.

Bovine Feed or Sales Yard - M3.

Bovine Keeping - A1, A2, RA, MR2, M2 and M3.

Bovine or Sheep Dip Manufacturing - M3.

Bowling Alley - C2, C5, CM, M1, M2 and M3.

Bowling on the Green - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Box and Crate Assembly - M1, M2 and M3.

Box Factory or Cooperage - MR2, M2 and M3.

Box Lunch Preparation - CM, MR1, MR2, M1, M2 and M3.

Box Spring Manufacturing - M1, M2 and M3.

Boxes and Crates, secondhand, storage display, processing or sale of - M2 and M3.

Boxing Arena (maximum 3,000 seating capacity) - C2, C5, CM, M1, M2 and M3.

Boxing Arena (unlimited seating capacity) - M1, M2 and M3.

Brass Foundry - M3.

Brewery - MR2, M2 and M3.

Brick Manufacturing - M3.

Bridge Club - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Briquette Manufacturing - M2 and M3.

Broadcasting Studio - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Broker, stocks, bonds or real estate - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Bronze Casting - M3.

Broom Manufacturing - M1, M2 and M3.

Brush Manufacturing - M1, M2 and M3.

Building Block Manufacturing - M3.

Building Furnishings Cleaning - M1, M2 and M3.

Building Materials, retail store - C1.5, C2, C5, CM, M1, M2 and M3.

Building Materials, Sales Yard - MR1, MR2, M1, M2 and M3.

Building Materials, Salvage Yard - MR2, M2 and M3.

Burglar Alarm Business - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Bus Station - C2, C4, C5, CM, M1, M2 and M3.

Bus Storage or Operating Yard - M1, M2 and M3.
Bush Crops - A1, A2, RA, MR1, MR2, M1, M2 and M3.

Business College - CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Butane Gas Filling Station - M1, M2 and M3.

Butcher Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM,

M1, M2 and M3.

Button Making - CM, MR1, MR2, M1, M2 and M3.

Button Manufacturing - MR1, MR2, M1, M2 and M3.

By-Product Products Manufacturing (from fish, meat or animals) - M3.

- C -

CD, DVD, Cassette or Video Tape Blank Manufacturing - M3.

CD, DVD, Cassette or Video Tape Manufacturing - M1, M2 and M3.

CD, DVD, Cassette or Video Tape Player Assembly - CM, MR1, MR2, M1, M2 and M3.

CD, DVD, Cassette or Video Tape Rental and Sales, new - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

CD, DVD, Cassette or Video Tape Rental and Sales, secondhand - C2, C5, CM, M1, M2 and M3.

Cabinet Shop - M1, M2 and M3.

Cafe - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Cafe, with entertainment (see Nightclub).

Cafeteria - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Calculator Repair - C1.5, C2, C5, CM, M1, M2 and M3.

Calibration and Repair Service Shop for precision instruments - C2, C5, CM, M1, M2 and M3.

Camera Repair - C1.5, C2, C5, CM, M1, M2 and M3.

Camera Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Can Manufacturing or Reconditioning - M3.

Candle Manufacturing - M1, M2 and M3.

Candy Manufacturing - CM, MR1, MR2, M1, M2 and M3.
Candy Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Cannery (fish or sauerkraut) - M3.

Cannery (except fish products or sauerkraut) - MR1, MR2, M1, M2 and M3.

Canvas Manufacturing - MR2, M2 and M3.

Canvas Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Cap Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Car Painting - C2, C5, CM, M1, M2 and M3.

Car Rental - C2, C5, CM, M1, M2 and M3.

Car Repairing (restrictions) - C2, C5, CM, M1, M2 and M3.

Car Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Car Sales, used - C2, C5, CM, M1, M2 and M3.

Car Upholstering - C2, C5, CM, M1, M2 and M3.

Car Wash - C2, C5, CM, M1, M2 and M3.

Carbon Paper Manufacturing - M1, M2 and M3.

Carnivals and Rides, transient - P, PB, C2, C5, CM, M1, M2 and M3.

Carousel - C2, C5, CM, M1, M2 and M3.

Carpenter Shop - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Carpet and Rug Cleaning Plant - MR1, MR2, M1, M2 and M3.

Carpet and Rug Manufacturing - MR2, M2 and M3.

Case Hardening - MR1, MR2, M1, M2 and M3.

Casting, heavy weight - M3.

Cat Breeding or Boarding - MR1, MR2, M1, M2 and M3.

Catering Establishment - CM, MR1, MR2, M1, M2 and M3.

Catering Truck Yard (see Trucking Yard).

Cattle Keeping (see Bovine Keeping).

Cellophane Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Cellulose Compound Manufacturing - M3.

Cellulose Nitrate Products Manufacturing - M3.

Cellulose Products Manufacturing - M1, M2 and M3.
Cement Manufacturing - M3.

Cement Mixer Rental - M1, M2 and M3.

Cement Products Manufacturing - MR1, MR2, M1, M2 and M3.

Cemetery - M2 and M3.

Cemetery, pet animal - M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Central Steam, heated or chilled water distributing plant - M1, M2 and M3.

Ceramic Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Cesspool Block Manufacturing - M3.

Cesspool Pumping, cleaning and draining equipment storage yard - M1, M2 and M3.

Chamois Skins Manufacturing - M2 and M3.

Charcoal Manufacturing - M3.

Charitable Institution - C2, C4, C5, CM, M1, M2 and M3.

Check Cashing Office - C2, C5, CM, M1, M2 and M3.

Chemical Manufacturing - M3.

Chewing Tobacco Manufacturing - M3.

Chicken Hatchery - M2 and M3.

Chicken Keeping - A1, A2, RA, RE, RS, R1, R2, RMP, R3, R4, R5, MR2, M2 and M3.

Chicken Raising - A1, A2, MR2, M2 and M3.

Child Care Facility - R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4 and C5.

Child Care (see Day Care).

Chinchilla Keeping - A1, A2, RA, RE, RS, R1, R2, R3, R4, R5, MR2, M2 and M3.

Chinchilla Raising - A1, A2, MR2, M2 and M3.

Chipping and Grinding Activities (enclosed building) - M2 and M3.

Chlorine Gas Manufacturing - M3.

Christmas Tree Farm - A1, A2, RA, MR1, MR2, M1, M2 and M3.

Christmas Tree and Ornament Selling - A1, A2, RA, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, P, PB, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Church - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

Church, Rescue Mission - C2, C4 and C5.

Church, Temporary Revival - C2 and C5.

Cigar Manufacturing - MR1, MR2, M1, M2 and M3.

Cigarette Manufacturing - MR1, MR2, M1, M2 and M3.

Circus Quarters or Menagerie - M2 and M3.

Circus, transient - C2, C5, CM, M1, M2 and M3.

Clay Products Manufacturing - M3.

Clay Products Storage - CM, MR1, MR2, M1, M2 and M3.

Clay Products Storage Yard - M1, M2 and M3.

Clinic, medical or dental - PF, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Cloth Manufacturing - MR2, M2 and M3.

Cloth Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Cloth Shrinking, Sponging or Waterproofing - M1, M2 and M3.

Clothes Cleaning Establishment, RAS3, RAS4, C1, C1.5, C2, C5, CM, M1, M2, M3.

Clothing Alterations Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Clothing Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Clothing Store, new - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Clothing Store, secondhand - C2, C5, CM, M1, M2 and M3.

Club - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Club, nonprofit - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Club, private, nonprofit - RAS3, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Coal Distillation - M3.

Coconut Oil Manufacturing and Refining - M3.

Coffee Roasting - M1, M2 and M3.

Coffee Shop - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Coil Manufacturing, small - CM, MR1, MR2, M1, M2 and M3.
Coil Spring Manufacturing - MR2, M2 and M3.

Coin Shop - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Coke Oven - M3.

Cold Storage Plant - MR1, MR2, M1, M2 and M3.

Collectibles Shop - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Collection Agency - C1.5, C2, C4, C5, CM, M1, M2 and M3.

College - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Columbarium - M2 and M3.

Commercial Shipping - SL.

Commercial Vehicle Rental and Storage - M1, M2 and M3.

Community Antenna Facilities - C2, C4, C5, CM, M1, M2 and M3.

Community Center, operated by governmental agency - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Community Center, operated by philanthropic organization - RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Community Center, operated by private agency - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Community Facilities - RAS3, RAS4, CR, C2, C4, C5.

Composting Facilities (enclosed building) - M2 and M3.

Compressed Natural Gas Automotive Refueling Station - C2, C5, CM, M1, M2 and M3.

Computer Assembly - CM, MR1, MR2, M1, M2 and M3.

Computer Manufacturing - MR1, MR2, M1, M2 and M3.

Computer Repair - C1.5, C2, C5, CM, M1, M2 and M3.

Computer Graphics Studio - RAS3, RAS4, C1, C1.5, C2, C5, CM, MR1, MR2, M1, M2 and M3.

Computer Server Equipment Rooms - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Computer Software and Other Computer-related Products and Services Development (no hardware) - RAS3, RAS4, C1, C1.5, C2, C5, CM.

Computer Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Computer Support Facilities - MR1, MR2, M1, M2 and M3.

Computer Software and other Computer-related Products and Services Development and Production (including hardware) - MR1, MR2, M1, M2 and M3.

Concert Hall (maximum 3,000 seating capacity) - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Concert Hall (unlimited seating capacity) - M1, M2 and M3.

Concrete Batching Plant - M3.

Concrete Products Manufacturing - MR1, MR2, M1, M2 and M3.

Condenser Manufacturing, small - CM, MR1, MR2, M1, M2 and M3.

Confectionery Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Confectionary Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Contractor's Equipment Rental Yard or Plant - M1, M2 and M3.

Contractor's Equipment Storage Yard or Plant - MR1, MR2, M1, M2 and M3.

Contractor's Establishment - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Convent - R4, RAS4 and R5.

Cookie Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Cooperage Works - M2 and M3.

Cork Manufacturing - MR2, M2 and M3.

Cork Products Manufacturing - MR1, MR2, M1, M2 and M3.

Cornice Works - M1, M2 and M3.

Corral, Stock Sales - M3.

Cosmetics Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Cosmetological Establishment - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Cotton Gin - M3.

Cotton Seed Oil Manufacturing and Refining - M3.

Counseling and Referral Facility - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Creamery - M1, M2 and M3.

Credit Association or Union - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Crematorium - M2 and M3.

Crematorium, animal - M3.

Creosote Manufacturing, bulk storage or treatment - M3.

Creosote Products Manufacturing - M3.

Crypt - M2 and M3.

Crystal Holder Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Cultural Center, for profit - C1.5, C2, C4, C5, M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Cultural Center, government or non-profit - RAS3, R4, RAS4, R5, CR, C1.5, C2, C4, C5, M1, M2 and M3.

Curing (enclosed building) - M2 and M3.

Cyber Café containing four or fewer computers or terminals - C2, C5, CM, M1, M2 and M3.

- D -

Dairy, cattle or goat - M2 and M3.

Dairy Products Depot - M1, M2 and M3.

Dairy Products Manufacturing - M1, M2 and M3.

Dairy Products Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Dance Studio or Academy - C2, C4, C5, CM, M1, M2 and M3.

Day Care Facility, adults - R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4 and C5.

Day Care Facility, dogs and cats (in enclosed buildings, no overnight stays) - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Day Care in Home for 14 or fewer children - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4 R5, CR, C1, C1.5, C2, C4, C5 and CM.

Dehydrating of Food - M1, M2 and M3.

Dehydrating Plant, petroleum - M3.

Delicatessen - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Dental Clinic - C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Dental Equipment and Supplies Store - C2, C4, C5, CM, M1, M2 and M3.

Dental Laboratory - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Department Store - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Designing Office or Shop - C2, C4, C5, CM, M1, M2 and M3.

Detective or Police Agency, private - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Dextrine Manufacturing - M3.

Diaper Service - C2, C5, CM, M1, M2 and M3.

Die Casting - MR2, M2 and M3.

Disinfectant Manufacturing - M3.

Distillation of Bones - M3.

Distillation of Coal, tar or wood - M3.

Distillation of Liquor - M3.

Distributing Station, milk - M1, M2 and M3.

Distribution Plant or Warehouse - MR1, MR2, M1, M2 and M3.

Doctor's or Dentist's Office - CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Dog and Cat Food Caterer - CM, MR1, MR2, M1, M2 and M3.

Dog and Cat Food Manufacturing - M1, M2 and M3.

Dog and Cat Hospital - MR1, MR2, M1, M2 and M3.

Dog Breeding or Boarding - MR1, MR2, M1, M2 and M3.

Dog Kennel - MR1, MR2, M1, M2 and M3.

Dog Race Track - M3.

Door Manufacturing - MR1, MR2, M1, M2 and M3.

Dormitory - R4, RAS4, R5, C1.5, C2, C4 and C5.

Doughnut Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Drama School, College or Studio - C2, C4, C5, CM, M1, M2 and M3.

Draying Yard or Terminal - MR1, MR2, M1, M2 and M3.

Dress Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Dress Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Dressing Rooms and offices associated with adjacent studio or theater - C2, C4, C5, CM, M1, M2 and M3.

Dressmaking Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Driving School - C2, C4, C5, CM, M1, M2 and M3.

Drop Forge Industry - M3.

Drug Manufacturing - MR1, MR2, M1, M2 and M3.

Drug Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Dry Cleaners, off premises - RAS3, RAS4, C1, C1.5, C2, C5, CM, M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Dry Cleaners, on premises - RAS3, RAS4, C2, C5, CM, M1, M2 and M3.

Dry Cleaners, self service - RAS3, RAS4, C1, C1.5, C2, C5, CM, M1, M2 and M3.

Dry Cleaning Plant - M1, M2 and M3

Dry Cleaning Plant, wholesale - MR1, MR2, M1, M2 and M3.

Dry Goods Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Dwelling, group - RW2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Dwelling, multiple - RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Dwelling, one-family - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Dwelling, one-family, attached - RZ, R2, RD, R3, RAS3, R4, RAS4, and R5.

Dwelling, two-family - RW2, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Dwelling, watchman or caretaker - MR1, MR2, M1, M2 and M3.

Dye Stuff Manufacturing - M3.

Dyeing Works Plant - MR1, MR2, M1, M2 and M3.

- E -

Earth or Soil Stockpiling, distribution or excavating - M3.

Earthworm or Grub Raising - A1, A2, RA, MR2, M2 and M3.
Ecological Preserve - OS.

Educational Institution - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

Egg Candling and Wholesale Distribution - M1, M2 and M3.

Elder Care Facilities - R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.
Electroplating Works - M1, M2 and M3.
Embalming - MR2, M2 and M3.

Emery Cloth Manufacturing - M3.

Employment Agency - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Enameling Works - MR2, M2 and M3.

Engine Testing - M2 and M3.

Electric Appliances, assembly of - CM, MR1, MR2, M1, M2 and M3.

Electric Car Charging Station in permitted parking lot - OS, PF, A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, P, PB, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3..

Electric Foundry - M1, M2 and M3.

Electric Generator or Motor Manufacturing - M1, M2 and M3.

Electric Motor Repair - C2, C5, CM, M1, M2 and M3.

Electric Motor Repair, wholesale - M1, M2 and M3.

Electric Parts, assembly and manufacturing - CM, MR1, MR2, M1, M2 and M3.

Electric Railroad Yard - M2 and M3.

Electrical Appliance Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Electrical Distributing Station - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Electrical Equipment Manufacturing - MR2, M2 and M3.

Electrical Receiving or Transforming Station - MR1, MR2, M1, M2 and M3.

Electrical Sign Manufacturing - MR1, MR2, M1, M2 and M3.

Electronic Devices Repair, household - C1.5, C2, C5, CM, M1, M2 and M3.

Electronic Instruments and Devices Assembly - CM, MR1, MR2, M1, M2 and M3.

Electronic Instruments and Devices Manufacturing - MR1, MR2, M1, M2 and M3.

Electronic Products Assembly and Manufacturing - MR1, MR2, M1, M2 and M3.

Electronics Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Electroplating of small articles - RM1, MR2, M1, M2 and M3.

Engineering Office - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Engraving - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Equine Boarding, Breeding, Grazing, Raising or Training (commercial) - M2 and M3.

Equine Keeping - A1, A2, RA, RE, RS, R1, R2, RD, RMP,

R3, R4, R5, MR2, M2 and M3.

Equine Racetrack - M3.

Equine Show - C2, C5, CM, M1, M2 and M3.

Escort Bureau - C2, C4, C5, CM, M1, M2 and M3.

Excelsior Manufacturing - MR2, M2 and M3.

Exhibits, commercial or cultural - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Explosives Manufacturing - M3.

- F -

Fabric Shrinking, sponging, waterproofing or dyeing - M1, M2 and M3.

Fabrication of Iron or Steel - M3.

Fabrication of Light Weight Steel - M1, M2 and M3.

Fairgrounds, public - C2, C5, CM, M1, M2 and M3.

Farm Machinery Sales - C2, C4, C5, CM, M1, M2 and M3.

Farming - A1, A2, RA, RE, RS, R1, R2, R3, R4, R5, MR1, MR2, M1, M2 and M3.

Feather Products Manufacturing - MR1, MR2, M1, M2 and M3.

Feed Storage and Sales Yard - M1, M2 and M3.

Feed Store - C2, C5, CM, M1, M2 and M3.

Feeding Pen, stock - M3.
Felt Manufacturing, burlap, fur hair or wood - M3.

Felt Manufacturing, cotton - M2 and M3.

Felt Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Fencing, wire, manufacturing - MR2, M2 and M3.

Ferris Wheel - C2, C5, CM, M1, M2 and M3.

Fertilizer Manufacturing, liquid - M2 and M3.

Fertilizer Manufacturing, processing or packaging - M3.

Fertilizer Sales, wholesale - M2 and M3.

Fibre Manufacturing - M3.

Fibre Products Manufacturing - MR1, MR2, M1, M2 and M3.

Field Crops - A1, A2, RA, RE, RS, R1, R2, R3, R4, R5, MR1, MR2, M1, M2 and M3.

Film and Tape Editing - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Film Development/Printing Machines - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Film Exchange - C2, C4, C5, CM, M1, M2 and M3.

Film Laboratory - CM, MR1, MR2, M1, M2 and M3.

Financial Institution - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Fire Station - PF, C2, C4, C5, CM, M1, M2 and M3.

Firearms Manufacturing (restrictions) -MR2, M2 and M3.

Fireworks Manufacturing or Storage - M3.

Fish Canning, cleaning or curing - M3.

Fish Distributing, wholesale or stock wagon operators - M1, M2 and M3.

Fish Keeping - A1, A2, RA, MR2, M2 and M3.

Fish Market - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Fish Market, wholesale or jobber - CM, MR1, MR2, M1, M2 and M3.

Fish Oil or Fishmeal Manufacturing - M3.

Fish Raising - A1, A2, MR2, M2 and M3.

Fish Smoking - M3.

Fishing - SL.
Flocking and Silk Screen Processing - M1, M2 and M3.

Florist - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Flour Mill - M1, M2 and M3.

Flower Gardening - A1, A2, RA, MR1, MR2, M1, M2 and M3.

Flower Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Food Commissary - CM, MR1, MR2, M1, M2 and M3.

Food Dehydrating Plant - M1, M2 and M3.

Food Products Manufacturing - MR1, MR2, M1, M2 and M3.

Football Stadium (maximum 3,000 eating capacity) - C2, C5, CM, M1, M2 and M3.

Football Stadium (unlimited seating capacity) - M1, M2 and M3.

Forge Plant - M3.

Fortune Telling, psychic counseling - C1.5, C2, C4, C5, CM, M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Foundry (except iron, steel, brass manganese, bronze and zinc) - M1, M2 and M3.

Foundry, iron, steel, brass, manganese, bronze and zinc) - M3.

Fowl Keeping - A1, A2, RA, MR2, M2 and M3.

Fowl Raising - A1, A2, MR2, M2 and M3.

Fox Farm - M2 and M3.

Fraternal Association - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Fraternity House - R4, RAS4, R5, C1.5, C2, C4 and C5.

Freight Classification Yard, railroad - M3.

Freight Forwarding Station or Terminal - M1, M2 and M3.

Freighting Yard or Terminal - MR1, MR2, M1, M2 and M3.

Frit or Glaze Manufacturing - M3.

Frog Keeping - A1, A2, RA, MR2, M2 and M3.

Frog Raising - A1, A2, MR2, M2 and M3.

Frozen Food Locker Rental - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Frozen Food Store - RAS3, RAS4, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Fruit Cannery - MR1, MR2, M1, M2 and M3.

Fruit Preserving - M1, M2 and M3.

Fuel Store - C2, C5, CM, M1, M2 and M3.

Fuel Yard - M1, M2 and M3.

Fumigating Plant - M2 and M3.

Fun House - C2, C5, CM, M1, M2 and M3.

Funeral Parlor - MR2, M2 and M3.

Fur Cleaning - C2, C5, CM, M1, M2 and M3.

Fur Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Furniture Assembly Plant - MR1, MR2, M1, M2 and M3.

Furniture Cleaning - C2, C5, CM, M1, M2 and M3.

Furniture Manufacturing - MR1, MR2, M1, M2 and M3.

Furniture, secondhand, storage, display, processing or sales - M2 and M3.

Furniture Store - C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

- G -

Galvanizing of Metal or Metal Products - M3.

Game Arcade (restrictions) - C2, C5, CM, M1, M2 and M3.

Garage, parking - PB, C2, C4, C5, CM, M1, M2 and M3.

Garage, public - C2, C5, CM, M1, M2 and M3.

Garbage Dump, closed - OS.

Garbage Incineration, reduction or dumping - M3.

Garden Equipment Rental - C2, C5, CM, M1, M2 and M3.

Garden Furniture Display Area - C2, C4, C5, CM, M1, M2 and M3.

Gardener's Refuse Collection Yard or Station - M1, M2 and M3.

Garment Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Garnetting or Carding of previously produced fibrous materials - M2 and M3.

Gas Manufacturing - M3.

Gas Storage - M3.

Gasoline Refining - M3.

Gasoline Station - C2, C5, CM, M1, M2 and M3.

Gasoline Tank Farm - M3.

Gelatine Manufacturing - M3.

Geological Core Hole Drilling and Testing - M3.

Gift Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Glass Fibre Manufacturing - M3.

Glass Manufacturing - M3.

Glass or Mirror Store - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Glass Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Glove Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Glucose Manufacturing - M3.

Glue Manufacturing - M3.

Goat Feed or Sales Yard - M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Goat Keeping - A1, A2, RA, MR2, M2 and M3.

Goat Raising - A1, A2, MR2, M2 and M3.

Golf Balls Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Golf Club - C1.5, C2, C5, CM, M1, M2 and M3.

Golf Course - OS, A1, A2, RA, C1.5, C2, C5, CM, M1, M2 and M3.

Golf Driving Range - C2, C5, CM, M1, M2 and M3.

Grain Drying or Fermenting - M3.

Grain Elevator - M1, M2 and M3.

Granite, decomposed, excavating or stockpiling of - M3.

Granite Grinding, dressing or cutting - M2 and M3.

Graphite Manufacturing - M3.

Gravel Distribution - M3.

Gravel Plant - M3.

Grease Manufacturing or Refining - M3.

Greenhouse - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Grocery Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Guncotton Products Manufacturing - M3.

Gunpowder Manufacturing or Storage - M3.

Gunsmith Shop (restrictions) - C2, C5, CM, M1, M2 and M3.

Gutta-perche, treating or manufacturing products therefrom - M3.

Gymnasium - C1.5, C2, C5, CM, M1, M2 and M3.

Gypsum Manufacturing, processing or grinding - M3.

- H -

Hair Care Products Manufacturing - MR1, MR2, M1, M2 and M3.

Hair Dresser - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Handyman Shop - C2, C5, CM, M1, M2 and M3.

Hardware Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Hat Making Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Hat Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Hatchery, poultry or fish - M2 and M3.

Hay Barn - CM, MR1, MR2, M1, M2 and M3.

Health Club - C1.5, C2, C5, CM, M1, M2 and M3.

Heat Treating - MR1, MR2, M1, M2 and M3.

Heating Equipment Manufacturing - M1, M2 and M3.

Heating Gas Manufacturing - M3.

Helicopter Landings, infrequent - A1, A2, P, PB, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Heliport - M2 and M3.

Hides, curing, tanning or storage of raw - M3.

Hobbyist's Rental Shop - C2, C5, CM, M1, M2 and M3.

Hog Keeping (five or fewer) - A1, MR2, M2 and M3.

Hog Ranch, feed or sales yard - M3.

Home for the Aged, with special care - R5, C1, C1.5, C2, C5 and CM.

Home for the Aged, with special care, philanthropic -R4, RAS4,, R5, C1, C1.5, C2 and C5.

Home for the Aged, no medical or nursing care - RAS3.

Home Occupations (restrictions) - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, R4 and R5.

Honey Processing and Packing - M1, M2 and M3.

Horn Products Manufacturing - MR1, MR2, M1, M2 and M3.

Horse Keeping (see Equine Keeping).

Hosiery Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Hospice, philanthropic - R4, R5, CR, C1, C1.5, C2, C5.

Hospice - R5, CR, C1, C1.5, C2, C5.

Hospital - PF, R5, C1, C1.5, C2 and C5.

Hostel (see Hotel).

Hotel (restrictions) - R4, RAS4, R5, CR, C1, C1.5, C2, C4 and C5.

House of Worship - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

House of Worship, Rescue Mission - C2, C4 and C5.

House of Worship, Temporary Revival - C2 and C5.

House Mover or Wrecker - M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Household Appliance Repair - C1.5, C2, C5, CM, M1, M2 and M3.

Household Moving Truck Repair and Storage - M1, M2 and M3.

Hydrochloric Acid Manufacturing - M3.

Hydroponic Agricultural Enterprise - A1, A2, RA, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

- I -

Ice and Cold Storage Plant - MR1, MR2, M1, M2 and M3.
Ice Cream Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Ice Cream Parlor - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Ice Manufacturing or Distributing - M1, M2 and M3.

Ice Skating Rink - C2, C5, CM, M1, M2 and M3.

Ice Storage House - C2, C5, CM, M1, M2 and M3.

Ice Storage Plant - M1, M2 and M3.

Import-Export Business - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Incinerator Manufacturing - M3.

Ink Manufacturing - M1, M2 and M3.

Inner Spring Manufacturing - MR2, M2 and M3.

Insecticide or Pesticide Blending or Mixing - MR2, M2 and M3.

Insecticide or Pesticide Manufacturing - M3.

Insurance Agency - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Intelligence Agency, private - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Interior Decorating Store - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Iron Foundry or Fabrication Plant - M3.

Iron Ore Pellet Loading and Unloading Facility - M2 and M3.

Iron Storage, sorting, collecting or baling - M2 and M3.

Iron Works, ornamental - M1, M2 and M3.

- J -

Jewelry Manufacturing - C5, CM, MR1, MR2, M1, M2 and M3.

Jewelry Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Jewelry Store, secondhand - C2, C5, CM, M1, M2 and M3.

Joint Living/Work Quarters for Artists and Artisans (restrictions) - RAS3, RAS4, C1, C1.5, C2, C5 and CM.

Juice Manufacturing - M1, M2 and M3.

Juke Box Assembling - M1, M2 and M3.

Juke Box Rental and Sales, new or used - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Junk Collection, sorting, storage or baling - MR2, M2 and M3.

Junk Yard - M2 and M3.

Jute Products Manufacturing - M3.

- K -

Karaoke Establishment (see Nightclub).

Kennel - MR1, MR2, M1, M2 and M3.

Knitting Mill - CM, MR1, MR2, M1, M2 and M3.

- L -

Labor Union Office - C2, C4, C5, CM, M1, M2 and M3.

Laboratory, experimental, film, motion picture, research or testing - CM, MR1, MR2, M1, M2 and M3.

Laboratory, medical or dental - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Lacquer Manufacturing - M3.

Lampblack Manufacturing - M3.

Lapidary Shop - CM, MR1, MR2, M1, M2 and M3.

Lard Manufacturing - M3.

Laundromat, self service - RAS3, RAS4, C1, C1.5, C2, C5, CM, M1, M2 and M3.

Laundry - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Laundry Plant - M1, M2 and M3.

Laundry Plant, wholesale - MR1, MR2, M1, M2 and M3.

Lawn Mower and Renovator Rental - C2, C5, CM, M1, M2 and M3.

Lawn Mower and Renovator Repair - C1.5, C2, C5, CM, M1, M2 and M3.

Leaf Mold Storage, composting and packaging - M2 and M3.

Leather Machine Belt Manufacturing - M1, M2 and M3.

Leather Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Library, non-profit - RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, M1, M2 and M3.

Library, profit - C1, C1.5, C2, C4, C5, M1, M2 and M3.

Library, public - PF, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, M1, M2 and M3.

Light Sheet Metal Products Manufacturing - MR1, MR2, M1, M2 and M3.

Lime Manufacturing - M3.

Limousine Service (see Car Rental).

Linen Supply Business - C2, C5, CM, M1, M2 and M3.

Linoleum Manufacturing - M3.

Linseed Oil Manufacturing - M3.

Liquid Coating for Beverage Tanks, manufacturing of - M2 and M3.

Liquid Fertilizers Manufacturing - MR2, M2 and M3.

Liquor or Spirits Rectifying - M1, M2 and M3.

Lithographing - C2, C4, C5, CM, M1, M2 and M3.

Livestock Exhibition, sale or stable - M2 and M3.

Loan Office - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Locker Rental - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Locksmith Shop - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Lodge - RAS3, RAS4, C1, C1.5, C2, C5, CM, M1, M2 and M3.

Lodge, non-profit - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Lodge, private, non-profit - RAS3, RAS4. R5, CR, C1, C1.5, C2, C4, C5 CM, M1, M2 and M3.

Lubricating Oil, canning and packaging - MR2, M2 and M3.

Lumber Store - C2, C5, CM, M1, M2 and M3.

Lumber Yard, retail - MR1, MR2, M1, M2 and M3.

Lumber Yard, used materials and salvaging - M3.

Lumber Yard, wholesale - MR2, M2 and M3.

- M -

Machine Belt Manufacturing - MR1, MR2, M1, M2 and M3.

Machine Shop, precision - CM, MR1, MR2, M1, M2 and M3.

Machine Shop - MR1, MR2, M1, M2 and M3.

Machinery, farm, repairing and overhauling - M1, M2 and M3.

Machinery Manufacturing - M3.

Machinery Wrecking or storage yard - M2 and M3.

Magazine Business, secondhand - C2, C5, CM, M1, M2 and M3.

Mail Order House - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Manicure Parlor - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Manure Storage or Processing - M3.

Marble Grinding, dressing or cutting - M2 and M3.

Marine Cargo Loading or Unloading Wharf or Dock - M2 and M3.

Marine Oil Service Station - C2, C5, CM, M1, M2 and M3.

Marine Oil Terminal - M3.

Marine Preserve - OS.

Market, public, wholesale and jobbers - CM, MR1, MR2, M1, M2 and M3.

Martial Arts Studio (see Gymnasium).

Massage Parlor - C2, C4, C5, CM, M1, M2 and M3.

Masseur or Masseuse - C2, C4, C5, CM, M1, M2 and M3.

Mat Manufacturing - MR1, MR2, M1, M2 and M3.

Match Manufacturing - M3.

Match Manufacturing, safety paper - MR2, M2 and M3.

Mattress Factory or Renovating - CM, MR1, MR2, M1, M2 and M3.

Mattress Shop - C2, C4, C5, CM, M1, M2 and M3.

Mausoleum - M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Meat Cutting Plant - M1, M2 and M3.
Meat Market - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Media-related Products and Services Development (including hardware) - MR1, MR2, M1, M2 and M3.

Media-related Products and Services Development (no hardware) - RAS3, RAS4, C1, C1.5, C2, C5 and CM.

Medical Clinic - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Medical Laboratory - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Menagerie - M2 and M3.

Mental Hospital - C2 and C5.

Mental Institution, correctional or penal - M2 and M3.

Merry-Go-Round - C2, C5, CM, M1, M2 and M3.

Messenger Office - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Metal Products Inspection by X-Ray - M1, M2 and M3.

Metro Roll Farming - M2 and M3.

Metal Spinning - MR1, MR2, M1, M2 and M3.

Metal Stamp Manufacturing - MR1, MR2, M1, M2 and M3.

Metals, precious or semi-precious, manufacturing products of - CM, MR1, MR2, M1, M2 and M3.

Mice or Guinea Pig Raising for wholesale distribution or experimental purposes - M2 and M3.

Milk Bottling or Distributing Station - M1, M2 and M3.

Milk Container Roll Farming - M2 and M3.

Millinery Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Miniature Golf Course - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Mining of Natural Resources - M3.

Mink Farm - M2 and M3.

Mission, Rescue - C2, C4 and C5.

Mobile Medical Facility - RAS3, RAS4, P, PB, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Mobilehome Park - RMP.

Mobilehome Rental - C2, C5, CM, M1, M2 and M3.

Mobilehome Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Mobilehome Sales, used - C2, C5, CM, M1, M2 and M3.

Monastery - R4 and R5.

Monument Works - MR2, M2 and M3.

Monuments and Tombstones, retail sales - C2, C4, C5, CM, M1, M2 and M3.

Morgue - M2 and M3.

Mortuary or Mortuary School - MR2, M2 and M3.

Motel (see Hotel).

Motion Picture Film Rental - C2, C4, C5, CM, M1, M2 and M3.

Motion Picture or Television Tape Reconstruction - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Motion Picture Film or Television Tape Editing - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Motion Picture Production (no outdoor sets) - C2, C5 and CM.

Motion Picture Production (including outdoor sets) - MR1, MR2, M1, M2 and M3.

Motion Picture Theater - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Motor Coach Repairing or Overhauling - M1, M2 and M3.

Motorcycle or Motor Scooter Rental - C2, C5, CM, M1, M2 and M3.

Motorcycle or Motor Scooter Repair - C2, C5, CM, M1, M2 and M3.

Motorcycle or Motor Scooter Repair, wholesale - M1, M2 and M3.

Motorcycle or Motor Scooter Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Motorcycle or Motor Scooter Sales, used - C2, C5, CM, M1, M2 and M3.

Motorcycle Race Track - M3.

Motorcycle Storage Garage - C2, C4, C5, CM, M1, M2 and M3.

Moving Van Storage or Operating Yard - M1, M2 and M3.

Mulching Facilities (enclosed building) - M2 and M3.

Museum, for profit - C1.5, C2, C4, C5, M1, M2 and M3.

Museum, non-profit - RAS3, R4, RAS4, R5, CR, C1.5, C2, C4, C5, M1, M2 and M3.

Mushroom Farm - A1, A2, RA, MR1, MR2, M1, M2 and M3.

Mushroom Growing - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Music School or Studio - C2, C4, C5, CM, M1, M2 and M3.

Music Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Musical Instrument Manufacturing - MR1, MR2, M1, M2 and M3.

- N -

Nail Manufacturing - M3.

Nameplates, Signs or Advertising Matter (as provided in Section 12.21 A, also see “Signs” in this list, Building Code for specific regulations) - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5.

Natural Gas, Compressed - Refueling Station - C2, C5, CM, M1, M2 and M3.

Natural Resource Preserve - OS.

Neon Light Manufacturing - MR1, MR2, M1, M2 and M3.

Neon Sign Manufacturing - MR1, MR2, M1, M2 and M3.

Newspaper Office - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Newsstand - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Nightclub - C2, C4, C5, CM, M1, M2 and M3.

Nitric Acid Manufacturing - M3.

Nitrogen Manufacturing, compressing and bulk storage - MR2, M2 and M3.

Notions Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Novelties Manufacturing - MR1, MR2, M1, M2 and M3.

Novelties Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Numismatic Store - C2, C4, C5, CM, M1, M2 and M3.

Nursery, plant - A1, A2, RA, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.
Nursery School - RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4 and C5.

Nursing Home - R5, C1, C1.5, C2 and C5.

Nut Roasting, frying or candy coating - CM, MR1, MR2, M1, M2 and M3.

Nutria Keeping - A1, A2, RA, MR2, M2 and M3.

Nutria Raising - A1, A2, MR2, M2 and M3.

- O -

Observatory - C2, C4, C5, CM, M1, M2 and M3.

Offal or Dead Animal Dumping - M3.

Office (restrictions) - MR1 and MR2.

Office, business or professional - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Office Building - CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Office Building (restrictions) - MR1 and MR2.

Office, corporate headquarters - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Official Police Garage - M1, M2 and M3.

Oil Drilling Equipment Yard - M3.

Oil Drilling or Pumping and production of oil, gas or hydrocarbons - M3.

Oil Manufacturing (vegetable) - M3.

Oil Pipeline Booster Pump Station - M2 and M3.

Oil Reclaiming - M3.

Oil Refining - M3.

Oilcloth Manufacturing - M3.

Olive Oil Extraction - M2 and M3.

Open Storage - MR1, MR2, M1, M2 and M3.

Optical Goods Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Optician - C2, C4, C5, CM, M1, M2 and M3.

Orchard and Tree Crops - A1, A2, RA, MR1, MR2, M1, M2 and M3.
Ore Reduction Plant - M3.

Orphanage - R4, R5, C1, C1.5, C2, C4, C5 and CM.

Orthopedic Appliance Store - C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Orthopedic or Surgical Supplies Manufacturing - M1, M2 and M3.

Ostrich Farm - M2 and M3.

Oxygen Manufacturing, compressing and bulk storage - MR2, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Oxygen, storage of compressed - CM, MR1, MR2, M1, M2 and M3.

- P -

Packaging Business - CM, MR1, MR2, M1, M2 and M3.

Packing Plant, fruit or vegetable - M1, M2 and M3.

Paint Manufacturing - M3.

Paint Mixing - M1, M2 and M3.

Paint Products Manufacturing - MR1, MR2, M1, M2 and M3.

Paint Store - C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Paper Collecting, sorting, storage or baling - MR2, M2 and M3.

Paper Manufacturing or Converting - M3.

Paper Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Paper Scrap or Waste Storage, sorting, collection or baling - M2 and M3.

Parcel Delivery Service - MR1, MR2, M1, M2 and M3.

Parcel Delivery Service, branch - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Park or Playground, operated by government agency - OS, A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Park or Playground, operated by philanthropic organization - OS, R4, R5, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Park or Playground, operated by private agency - OS, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.
Parking Area, public - RAS3, RAS4, P, PB, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Parking, automobile -A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Parking Building - P, PB, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Parking Garage - PB, C2, C4, C5, CM, M1, M2 and M3.

Parking of Trucks or Buses - MR1, MR2, M1, M2 and M3.

Pectin Manufacturing - M1, M2 and M3.

Penny Arcade - C2, C5, CM, M1, M2 and M3.

Perfume Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Perfumed Toilet Soap Manufacturing - MR1, MR2, M1, M2 and M3.

Pest or Insect Control Business - C2, C5, CM, M1, M2 and M3.

Pet Animal Crematory - M3.

Pet Grooming - C2, C4, C5, CM, M1, M2 and M3..

Pet Store - C2, C4, C5, CM, M1, M2 and M3.

Petroleum Dehydrating Plant - M3.

Petroleum Products Bulk Distributing Station - M2 and M3.

Petroleum Products Manufacturing - M3.

Petroleum Pumping - M3.

Petroleum Refining - M3.

Pharmaceuticals Manufacturing - MR1, MR2, M1, M2 and M3.

Pharmacy, prescription - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Phenol Manufacturing - M3.

Phenol Products Manufacturing - M3.

Philanthropic Institution - R4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Philatelic Store - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Phonograph Assembly - CM, MR1, MR2, M1, M2 and M3.

Phonograph Record Blank Manufacturing - M3.

Phonograph Record Manufacturing - M1, M2 and M3.

Phonograph Record Store, new - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Phonograph Record Store, secondhand - C2, C5, CM, M1, M2 and M3.

Photo Developing and Finishing - C2, C4, C5, CM, M1, M2 and M3.

Photocopying - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Photo-Engraving - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Photographer - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Pickle Manufacturing - MR2, M2 and M3.

Pie Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Pigeon Keeping - A1, A2, RA, MR2, M1 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Pigeon Raising - A1, A2, MR2, M2 and M3.

Pinball Machine Rental or Sales, new or used - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Pipe Reclaiming - M3.

Pipe Storage Yard - M2 and M3.

Pitch and Putt Golf Course - C2, C5, CM, M1, M2 and M3.

Planing Mill - MR2, M2 and M3.

Plaster of Paris Manufacturing - M3.

Plaster Staff Works - M2 and M3.

Plastic Manufacturing - M3.

Plastic Plate Embossing - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Plastic Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Plumbing Shop - C2, C5, CM, M1, M2 and M3.

Point Manufacturing - MR1, MR2, M1, M2 and M3.

Police Station - PF, RAS3, RAS4, C2, C4, C5, CM, M1, M2 and M3.

Polish Manufacturing - M2 and M3.

Polish Mixing, automobile or furniture - M1, M2 and M3.

Pony Riding Ring - C2, C5, CM, M1, M2 and M3.

Pool Hall - C2, C5, CM, M1, M2 and M3.

Portland Cement, bulk transfer - M1, M2 and M3.

Portland Cement, bulk, unloading and distribution - M3.

Post Office - PF, C2, C4, C5, CM, M1, M2 and M3.

Potash Manufacturing - M3.

Potato Chip Factory - M1, M2 and M3.

Pottery and Ceramics Display Area - C2, C4, C5, CM, M1, M2 and M3.

Pottery and Ceramics Store, retail - C2, C4, C5, CM, M1, M2 and M3.

Pottery Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Poultry Dealer or Broker, wholesale - CM, MR1, MR2, M1, M2 and M3.

Poultry Hatchery - M2 and M3.

Poultry Keeping - A1, A2, RA, RE, RS, RMP, R1, R2, R3, R4, R5, MR2, M2 and M3.

Poultry Killing - M1, M2 and M3.

Poultry Market - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Poultry Raising - A1, A2, MR2, M2 and M3.

Poultry Slaughterhouse, wholesale - M2 and M3.

Powdered Metal Parts or Articles Manufacturing - M2 and M3.

Printing Establishment - C2, C4, C5, CM, M1, M2 and M3.

Printing Establishment, wholesale - MR1, MR2, M1, M2 and M3.

Printing or Stenciling Designs on fabric, cloth or wallpaper - M1, M2 and M3.

Private Detective Agency - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Private School - RAS3, RAS4, CR, C2, C4 and C5.

Produce Market - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Produce Market, wholesale - CM, MR1, MR2, M1, M2 and M3.

Produce Yard or Terminal - M1, M2 and M3.

Professional Office - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Public Health Facility (also see Hospital and Medical Clinic) - PF.

Public Market, wholesale - CM, MR1, MR2, M1, M2 and M3.

Public School - PF, RAS3, RAS4, CR, C2, C4 and C5.

Public Utility Service Yard - MR1, MR2, M1, M2 and M3.

Publishing Establishment - C2, C4, C5, CM, M1, M2 and M3.

Publishing Establishment, wholesale - MR1, MR2, M1, M2 and M3.

Pulp or Paper Manufacturing - M3.

Pumping Plant - M1, M2 and M3.

Pumpkin Sales - A1, A2, RA, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5, P, PB, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Pyrotechnics Manufacturing - M3.

Pyroxylin Manufacturing - M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

- Q -

Quality Control Laboratory - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Quarry - M3.

- R -

Rabbit Keeping - A1, A2, RA, RE, RS, RMP, R1, R2, R3, R4, R5, MR2, M2 and M3.

Rabbit Killing - M1, M2 and M3.

Rabbit Raising - A1, A2, MR2, M2 and M3.

Rabbit Slaughterhouse, wholesale - M2 and M3.

Racetrack, automobile, dog, horse or motorcycle - M3.

Radio and Television Assembly - CM, MR1, MR2, M1, M2 and M3.

Radio and Television Repair Shop - C2, C5, CM, M1, M2 and M3.

Radio and Television Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.
Radio Broadcasting Studio - C2, C4, C5, CM, M1, M2 and M3.

Radio Broadcasting Transmitter - M1, M2 and M3.

Rag Collection, sorting, storage or baling - MR2, M2 and M3.

Railroad Repair Shop - M3.

Railroad Yard - M3.

Real Estate Office - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Recording Studio - C2, C4, C5, CM, M1, M2 and M3.

Recreation (also see Park) - OS and SL.

Recreation Area, commercial - C1.5, C2, C5, CM, M1, M2 and M3.

Recreation Area, public - OS, C1.5, C2, C5, CM, M1, M2 and M3.

Recreation Building - C2, C4, C5, CM, M1, M2 and M3.

Recreation Center, owned and operated by governmental agency - RAS3, RAS4, C2, C4, C5, CM, M1, M2 and M3.

Recreational Vehicle Rental - C2, CM, M1, M2 and M3.

Recreational Vehicle Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Recreational Vehicle Sales, used - C2, C5, CM, M1, M2 and M3.

Recreational Vehicle Storage - MR1, MR2, M1, M2 and M3.

Recycling Area or Room for Multiple-Family Residential Uses (restrictions) - RD, R3, RAS3, R4, RAS4, R5.

Recyclable Materials Collection, Buyback Centers, Mobile Recycling Centers (restrictions) - M2 and M3.

Recycling Collection or Buyback Centers in Conjunction with a Grocery Store (restrictions) - RAS3, RAS4, P, PB, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Recycling Material Sorting Facilities (restrictions) - MR1, MR2, M1, M2 and M3.

Recycling Materials Processing Facilities (restrictions) - M2 and M3.

Reducing Salon - C1.5, C2, C5, CM, M1, M2 and M3.

Refinery, petroleum or gasoline - M3.

Refrigeration Equipment Installation or Service - C2, C5, CM, M1, M2 and M3.

Refrigeration Plant, storage - M1, M2 and M3.
Refuse Dump - M3.

Refuse Transfer Station - M3.

Religious Association - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Religious Retreat - R4, RAS4 and R5.

Rental Equipment Store, retail - C2, C5, CM, M1, M2 and M3.

Repair Garage - C2, C5, CM, M1, M2 and M3.

Repair Shop - C2, C5, CM, M1, M2 and M3.

Research and Development Center - MR1, MR2, M1, M2 and M3.

Reservoir, water - OS, M1, M2 and M3.

Rest Home, convalescent - R5, C1, C1.5, C2 and C5.

Restaurant - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Retail Store or Business - C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Retinning and Reconditioning of Milk Containers - M2 and M3.

Retreat House (see Religious Retreat).

Riding Academy, school, club or stable - M2 and M3.

Rifle Range - M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Rock, sand, gravel or earth distribution or storage - M3.

Rodeo Grounds or Stadium - M2 and M3.

Roll Forming of Metal, cold process - MR2, M2 and M3.

Roller Skating Rink - C2, C5, CM, M1, M2 and M3.

Rolling Mill - M3.

Roofing Material Factory - M3.

Rooming House - R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5 and CM.

Rope Factory - M3.

Roundhouse - M3.

Rubber Cement Manufacturing - M2 and M3.

Rubber Manufacturing, treating or reclaiming plant - M3.

Rubber or Metal Stamp Store - C1.5, C2, C5, CM, M1, M2 and M3.
Rubber Products Manufacturing - MR1, MR2, M1, M2 and M3.

Rubber Stamp Manufacturing - MR1, MR2, M1, M2 and M3.

Rubbish Incineration or Storage - M3.

Rug Cleaning Plant - MR1, MR2, M1, M2 and M3.

Rug Manufacturing - MR2, M2 and M3.

- S -

Sack Storage, sorting, collection or baling - MR2, M2 and M3.

Safe and Vault Repairing and Servicing - C2, C5, CM, M1, M2 and M3.

Salt Works - M3.

Salvage Business - M2 and M3.

Sand Blasting - M3.

Sand Distribution Plant - M3.

Sand Pit - M3.

Sandpaper Manufacturing - M3.

Sanitarium - R5, C1, C1.5, C2 and 5.

Sanitary Landfill (see Garbage Dump).

Sash Manufacturing - MR1, MR2, M1, M2 and M3.

Sauerkraut Manufacturing - M3.

Sausage Manufacturing - M1, M2 and M3.

Savings and Loan Association -RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Saw Mill - M3.

Scenic Railway - C2, C5, CM, M1, M2 and M3.

School, art - CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

School, dance - C2, C4, C5, CM, M1, M2 and M3.

School, drama - C2, C4, C5, CM, M1, M2 and M3.

School, elementary or high - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

School, music - C2, C4, C5, CM, M1, M2 and M3.
School, private - RAS3, RAS4, CR, C2, C4 and C5.

School, professional or scientific - CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

School, public - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

School, trade, technical or occupational - C2, C4, C5, CM, M1, M2 and M3.

Scientific Instrument and Equipment Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Scientific Instrument Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Scrap Iron Sales - M3.

Scrap Iron Storage, sorting, collection or baling - M2 and M3.

Scrap Metal Collection, sorting, storage or baling - MR2, M2 and M3.

Scrap Metal Processing Yard - M3.

Screw Machine Products Manufacturing - MR2, M2 and M3.

Screw Thread Rolling or Cutting - MR2, M2 and M3.

Secondhand Box or Container Storage, display, processing or sales - M2 and M3.

Secondhand Furniture and Appliance Storage, display, processing or sales - M2 and M3.

Secondhand Store (no pawnshops) - C2, C5, CM, M1, M2 and M3.

Security Service - CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Senior Housing, independent - R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM.

Servant's Quarters - A1, A2, RA, RE, R1, RW1, RW2, R2,

RD, R3, R4, R5 and CM.

Sewage Disposal or Treatment Plant - M3.

Sewer Pipe Manufacturing - M3.

Sharpening or Grinding of Tools or Cutlery - C2, C5, CM, M1, M2 and M3.

Sheep Feed or Sales Yard - M3.

Sheep Keeping - A1, A2, RA, MR2, M2 and M3.

Sheep Raising - A1, A2, MR2, M2 and M3.

Sheet Metal Products Manufacturing, light - MR1, MR2, M1, M2 and M3.
Sheet Metal Shop - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Shellac Manufacturing - M3.

Shellac Mixing - M1, M2 and M3.

Shell Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Shelter for the Homeless, declared shelter crisis, government property (only pursuant to a Council resolution as provided in Sec. 12.80).- OS, PF, A1, A2, RA, RE, RS, R1, RU, RZ, RW1, R2, RD, RMP, RW2, R3, RAS3, R4, RAS4, R5, P, PB, CR, C1, C1.5, C2, C4, C5, CM, MR1, M1, MR2, M2 and M3.

Shelter for the Homeless, declared shelter crisis, charitable organization (subject to the provisions of Sec. 12.81). - R3, RAS3, R4, RAS4, R5, C2, C4, C5, CM, M1, M2 and M3.

Shelter for the Homeless - R4, RAS4, R5, C2, C4, C5 and CM.

Shingle Mill - M3.

Shipbuilding - M3.

Shoddy Manufacturing - M3.

Shoe Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Shoe Polish Manufacturing - M3.

Shoe Repair Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Shoe Shine Stand - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Shoe Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Shooting Gallery - C2, C5, CM, M1, M2 and M3.

Shooting Range - M2 and M3.

Showcase Theater - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Shrimp, frozen-cleaning, breading, packaging and re-freezing - M2 and M3.

Side Show, circus, transient - C2, C5, CM, M1, M2 and M3.

Sign Manufacturing - MR1, MR2, M1, M2 and M3.

Sign Painting - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Signs (as provided in Section 12.17.5 B 9, also see Building Code for specific regulations) - MR1.

Signs (as provided in Section 12.18 B 5, also see Building Code for specific regulations) - MR2.

Signs, advertising, on-site only (see Building Code for regulations.) - C2, C4, C5, CM, M1, M2 and M3.

Signs, directional and identification (as provided in Section 12.12.1 A 3, also see Building Code for specific regulations) - P, PB.

Signs, identification (as provided in Section 12.12.2 A 6, also see Building Code for specific regulations) - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Signs, nameplates or advertising matter (as provided in Section 12.21 A 7, also see Building Code for specific regulations) - A1, A2, RA, RE, RS, R1, RU, RZ, RMP, RW1, RW2, R2, RD, R3, RAS3, R4, RAS4, R5.

Silk Screen Printing - CM, MR1, MR2, M1, M2 and M3.

Size Manufacturing - M3.

Skateboard Track - C2, C5, CM, M1,M2 and M3.

Skating Rink - C2, C5, CM, M1, M2 and M3.

Skeet or Trap Shooting - M2 and M3.

Skilled Nursing Care - R5, CR, C1, C1.5, C2, C5.

Slot Car Racing - C2, C5, CM, M1, M2 and M3.

Smelter, tin, copper, zinc or iron ores - M3.

Snake or Reptile Raising - M2 and 3.

Soap Manufacturing - M1, M2 and M3.

Soda Fountain - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Sodium Compounds Manufacturing - M3.

Soft Drink Manufacturing or Bottling - M1, M2 and M3.

Sorority House - R4, RAS4, R5, C1.5, C2, C4 and C5.

Sound Score Production - C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Special Care Home - R5, C1, C1.5, C2 and C5.

Special Care Home, philanthropic - R4, R5, C1, C1.5, C2 and C5.

Sport Cards Store - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Sporting Goods Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Sports Arena (maximum 3,000 seating capacity) - C2, C5, CM, M1, M2 and M3.

Sports Arena (unlimited seating capacity) - M1, M2 and M3.

Stable, commercial - M2 and M3.

Stable, livery - M2 and M3.

Stable, private - A1, A2, RA, RE, RS, R1, R2, RD, R3, R4, R5, MR2, M2 and M3.

Stadium (maximum 3,000 seating capacity) - C2, C5, CM, M1, M2 and M3.

Stadium (unlimited seating capacity) - M1, M2 and M3.

Stamp Manufacturing - MR1, MR2, M1, M2 and M3.

Stamp Store (postage) - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Stand for Display and Sale of Agricultural Products Raised on the Premises - A1, A2, MR1, MR2, M1, M2 and M3.

Starch, liquid, mixing and bottling - M1, M2 and M3.

Starch Manufacturing - M3.

Station, bus or train - C2, C4, C5, CM, M1, M2 and M3.

Stationery Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Statuary Manufacturing - M2 and M3.

Steel Foundry or Fabrication Plant and heavyweight casting - M3.

Steel Mill - M3.

Steel Pipe Manufacturing - M3.

Stencil Manufacturing - M1, M2 and M3.

Stereo Equipment Assembly - CM, MR1, MR2, M1, M2 and M3.

Stereo Equipment Manufacturing - MR1, MR2, M1, M2 and M3.

Stereo Equipment Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Stockyard or Feeding Pen - M3.

Stone Mill or Quarry - M3.

Stone Monument Works - M2 and M3.

Stones, precious or semi-precious, manufacturing products of - CM, MR1, MR2, M1, M2 and M3.

Storage, open - MR1, MR2, M1, M2 and M3.

Storage Building - CM, MR1, MR2, M1, M2 and M3.

Storage Building for Household Goods, including truck rentals (more than 500 ft. from A or R Zone, no higher than 37 ft.) - M1, M2 and M3.

Storage Building for Retail Merchandise with office - C2, C4, C5, CM, M1, M2 and M3.

Storage, incidental - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Stove Manufacturing - M2 and M3.

Stove Polish Manufacturing - M3.

Striptease Show (see Adult Cabaret or Adult Theater).

Studio - C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Studio, dance, drama, music, motion - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Sugar Refining - M3.

Sulfuric Acid Manufacturing - M3.

Sulfurous Acid Manufacturing - M3.

Surface Mining Operations - M3.

Swimming Pool, commercial - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Swimming Pool, public (see Recreation Center).

Swine Keeping (5 or fewer) - A1, MR2, M2 and M3.

Swine Ranch - M3.

Synthetic Rubber Products Manufacturing - MR1, MR2, M1, M2 and M3.

- T -

Tableware Manufacturing - MR1, MR2, M1, M2 and M3.

Tailor Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Tallow Manufacturing - M3.

Tank Coating Manufacturing - M2 and M3.

Tank Farm, Petroleum - M3.

Tank Retinning and Manufacturing - M2 and M3.

Tank Truck Parking or Storage - M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Tanning, curing or storing of raw hides or skins - M3.
Tar Distillation - M3.

Tar Products Manufacturing - M3.

Tar Roofing Manufacturing - M3.

Tar Waterproofing Manufacturing - M3.

Tatoo Studio - C2, C5, CM, M1, M2 and M3.

Taxicab Business - C2, C4, C5, CM, M1, M2 and M3.

Taxidermist - C2, C4, C5, CM, M1, M2 and M3.

Tea Room - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Telecommuting Center - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, MR1, MR2, M1, M2 and M3.

Telephone Exchange - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Television Broadcasting Transmitter - M1, M2 and M3.

Television Production (including outdoor sets) - MR1, MR2, M1, M2 and M3.

Television Production (no outdoor sets) - C2, C5 and CM.

Television Station - M2 and M3.

Television Studio (restrictions) - MR1, MR2, M1, M2 and M3.

Tempering - MR1, MR2, M1, M2 and M3.

Temple, religious - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

Temporary Geological Core Hole Drilling and Testing - M3.

Tennis Courts, privately operated - C1.5, C2, C5, CM, M1, M2 and M3.

Termite Control Business - C2, C5, CM, M1, M2 and M3.

Terra Cotta Tile Manufacturing - M3.

Testing Laboratory - CM, MR1, MR2, M1, M2 and M3.

Textile Manufacturing - MR2, M2 and M3.

Textile Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Theater - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Thrift and Loan Company - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Ticket Agency or Broker - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Tile Manufacturing - M3.

Tinsmith Shop - C2, C5, CM, M1, M2 and M3.

Tire Manufacturing - M3.

Tire Retreading or Recapping - MR1, MR2, M1, M2 and M3.

Tire Shop - C2, C5, CM, M1, M2 and M3.

Tobacco Products Manufacturing - MR1, MR2, M1, M2 and M3.

Tobacco Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Toiletries Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Tombstones, retail sales - C2, C4, C5, CM, M1, M2 and M3.

Tool Manufacturing - M1, M2 and M3.

Top Soil Stripping, removal or stockpiling - M3.

Tow Truck Dispatching - C2, C5, CM, M1, M2 and M3.

Towel Supply Business - C2, C5, CM, M1, M2 and M3.

Toy Manufacturing - MR1, MR2, M1, M2 and M3.

Tractor Rental Yard - MR2, M1, M2 and M3.

Trade, Technical or Occupational School - C2, C4, C5, CM, M1, M2 and M3.

Trading Stamp Business - C1.5, C2, C4, C5, CM, M1, M2 and M3.

Trailer Manufacturing - M1, M2 and M3.

Trailer Rental - C2, C5, CM, M1, M2 and M3.

Trailer Sales, new - C2, C4, C5, CM, M1, M2 and M3.

Trailer Sales, used - C2, C5, CM, M1, M2 and M3.

Trailer, Utility, rental and storage - M1, M2 and M3.

Train Station - C2, C4, C5, CM, M1, M2 and M3.

Transfer Business - C2, C5, CM, M1, M2 and M3.

Transformer Manufacturing, small - CM, MR1, MR2, M1, M2 and M3.

Transient Occupancy Residential Structure (see Hotel).

Travel Agency - RAS3, RAS4, CR, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Traveling Theatrical Performance (under canvas) - C2, C5, CM, M1, M2 and M3.

Tree Wrecking Yard - M2 and M3.

Tropical Fish Store - C2, C4, C5, CM, M1, M2 and M3.

Truck Gardening - A1, A2, RA, RE, RS, RMP, R1, R2, R3, R4, R5, MR1, MR2, M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Truck Rental (limitations) - C2, C5, CM, MR2, M1, M2, and M3.

Truck Sales or Storage Yard - M1, M2 and M3.

Truck Repairing or Overhauling - MR1, MR2, M1, M2 and M3.

Trucking Yard or Terminal - MR1, MR2, M1, M2 and M3.

Turkey Hatchery - M2 and M3.

Turkey Keeping - A1, A2, RA, MR1, MR2, M1, M2, and M3.

Turkey Raising - A1, A2, MR2, M2 and M3.

Turpentine Manufacturing - M3.

Typewriter Repair - C1.5, C2, C5, CM, M1, M2 and M3.

Typewriter Ribbon Manufacturing - M1, M2 and M3.

Typography Shop - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

- U -

U-Drive Business - C2, C5, CM, M1, M2 and M3.

Undertaking - MR2, M2 and M3.

Union Hall - C2, C4, C5, CM, M1, M2 and M3.

University - RAS3, R4, RAS4, R5, CR, C2, C4 and C5.

Upholstery Shop - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Used Car Lot - C2, C5, CM, MR1, MR2, M1, M2 and M3.

- V -

Varnish Manufacturing - M3.

Vegetable Cannery - MR1, MR2, M1, M2 and M3.

Vegetable Oil Manufacturing - M3.

Venetian Blind Manufacturing - M1, M2 and M3.

Venetian Blind Servicing and Repairing - C2, C5, CM, M1, M2 and M3.

Ventilating Duct Manufacturing - M1, M2 and M3.

Veterinary Clinic - C2, C4, C5, CM, MR1, MR2, M1, M2 and M3.

Veterinary Hospital - MR1, MR2, M1, M2 and M3.

Video and Other Media Production (including outdoor sets) - MR1, MR2, M1, M2 and M3.

Video and Other Media Production (no outdoor sets) - C2, C5 and CM.

Video Game Arcade (restrictions) - C2, C5, CM, M1, M2 and M3.

Video Tape, Cassette, CD or DVD Rental and Sales, new - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Video Tape, Cassette, CD or DVD Rental and Sales, secondhand - C2, C5, CM, M1, M2 and M3.

Vinegar Manufacturing - MR2, M2 and M3.

- W -

Wall Board Manufacturing - M3.

Wallpaper Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Warehouse - CM, MR1, MR2, M1, M2 and M3.

Wharf or Dock for Marine Cargo - M2 and M3.

Washer Manufacturing - MR1, MR2, M1, M2 and M3.

Waterproofing Compound Manufacturing - M1, M2 and M3.

Water Softening Unit, servicing and refrigeration plant - M1, M2 and M3.

Water (drinking) Store - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Water Works or Storage Facilities - M1, M2 and M3.

Water Conservation Area - OS.

Wax Polish Blending, mixing and packaging - M1, M2 and M3.

Wearing Apparel Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Wedding Chapel - C2, C4 and C5.
Welding, acetylene or electric - M1, M2 and M3.

Wild Animal Farm - M2 and M3.

Window and Exhibit Booth Displays, designing and fabricating - C2, C5, CM, MR1, MR2, M1, M2 and M3.

Window Manufacturing - MR1, MR2, M1, M2 and M3.

Window Shade Manufacturing, cloth - CM, MR1, MR2, M1, M2 and M3.

Window Shade Manufacturing, wood or metal - M1, M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

Window Shade Shop - C2, C4, C5, CM, M1, M2 and M3.

Winery - M3.

Wiping Rag Storage - CM, MR1, MR2, M1, M2 and M3.

Wire, application of rubber to - M3.

Wire Manufacturing - M2 and M3.

Wire Fencing Manufacturing - MR2, M2 and M3.

Wireless Telecommunications Facility, including radio and television transmitters (must meet standards under Sec. 12.21.A 20, cannot be across the street from, abutting, or adjoining a residential use or an A or R Zone).- M1, M2 and M3.

Wood Products Manufacturing - M1,M2 and M3.

Wood Pulling or Scouring - M3.

Wood Yard - M1, M2 and M3.

Woodworking Equipment Rental Shop - C2, C5, CM, M1, M2 and M3.

Woodworking Shop - MR1, MR2, M1, M2 and M3.

Wool Products Manufacturing - MR1, MR2, M1, M2 and M3.

Woven Wire Manufacturing - MR2, M2 and M3.

Wrestling Arena (maximum 3,000 seating capacity) - C2, C5, CM, M1, M2 and M3.

Wrestling Arena (unlimited seating capacity) - M1, M2 and M3.

Wrought Iron (Iron Works, Ornamental) - M1, M2 and M3.

Wrought Iron Shop - C2, C5, CM, M1, M2 and M3.

- X -

Xeroxing - C1.5, C2, C4, C5, CM, M1, M2 and M3.

- Y -

Yarn Products Manufacturing - CM, MR1, MR2, M1, M2 and M3.

Yarn Shop - RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2 and M3.

Yeast Manufacturing - MR2, M2 and M3.

- Z -

Zoo - M2 and M3.

NOTE: See first page of List No. 2 for important notes regarding restrictions on these uses.

APPENDIX D

SWAPE LETTER DATED NOVEMBER 20, 2020

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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November 20, 2020

Hannah Bentley
Blum Collins Ho LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: **Comments on Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project (SCH No. 2019079096)**

Dear Ms. Bentley,

We have reviewed the July 2019 Draft Initial Study/Mitigated Negative Declaration ("IS/MND"), as well as the August 2020 Final Initial Study/Mitigated Negative Declaration ("FIS/MND"), for the Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project ("Project") located in the City of Los Angeles ("City"). The Project proposes to expand the existing 175 ton per day ("TPD") Direct Disposal Medium Volume Construction, Demolition and Inert ("CDI) Material Recovery Facility to accommodate a Large Volume Solid Waste Facility Permit that processes up to 500 TPD of CDI and solid waste. The Project would not include the construction of any additional floor area on the 1.24-acre site.

Our review concludes that the IS/MND and FIS/MND fail to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An EIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The FIS/MND's air quality analysis relies on emissions calculated with CalEEMod.2016.3.2 (p. CM-8).[1] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are utilized in calculating the Project's air pollutant emissions and make known which default values are changed as well as provide justification for the values selected.

When reviewing the Project's CalEEMod output files, provided in the Air Quality Modeling Worksheets as Appendix CM-I to the FIS/MND, we found that several model inputs were not consistent with information disclosed in the IS/MND and FIS/MND. As a result, the Project's construction and operational emissions are underestimated. A Project-specific EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Use of an Underestimated Sunday Trip Rate

According to the FIS/MND:

> "The increase in permitted throughput from the 175 TPD to 500 TPD would generate an additional 274 daily vehicle trips, the Project will generate 274 daily vehicle trips" (p. RTC-29).

As such, the Project's CalEEMod model should have included 274 average daily vehicle trips. However, review of the Project's CalEEMod output files demonstrates that the model includes zero Sunday vehicle trips (see excerpt below) (Appendix CM-I, pp. 46).

	Average Daily Trip Rate		
Land Use	Weekday	Saturday	Sunday
General Heavy Industry	273.78	273.78	0.00
Total	273.78	273.78	0.00

As you can see in the excerpt above, the average number of Sunday vehicle trips was underestimated by 274 trips in the model. Thus, the model is inconsistent with the information provided by the FIS/MND and estimates the Project's mobile-source operational emissions assuming an underestimated Sunday trip rate. This underestimation presents an issue, as CalEEMod uses the operational vehicle trip rates to

[1] CAPCOA (November 2017) CalEEMod User's Guide, http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4.

calculate the emissions associated with operational on-road vehicles.[2] Thus, by including an underestimated operational vehicle trip rate, the model underestimates the Project's mobile-source operational emissions and should not be relied upon to determine Project significance.

Underestimated Number of Pieces of Operational Off-Road Equipment

According to the FIS/MND:

> "The proposed project will increase the number of vehicles using the facility as well as the running times for *off-road diesel-powered equipment* used to process material at the facility" (emphasis added) (pp. 12).

As the above excerpt demonstrates, the Project proposes to use off-road diesel-powered equipment throughout operation to process material at the facility. Furthermore, the Air Quality Modeling Worksheets provide an operational off-road equipment list indicating the number, hours of operation, days per year, vehicle speed, and total daily miles of the anticipated operational equipment (see excerpts below) (Appendix CM-I, pp. 20-22).

Emissions Calculations - Loaders

Hp	2020 Composite
Hours of Operaton per Day	8
Number	3
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

Emissions Calculations - Bobcat (skid steer loader)

Hp	2020 Composite
Hours of Operaton per Day	11
Number	1
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

[2] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.caleemod.com/, p. 35.

Emissions Calculations - Telehandler

Hp	(2020 Other Material Handling Equipment Composite)
Hours of Operaton per Day	11
Number	1
Vehicle Speed (mph)	0.5
Total Daily Miles	5
Days/year	312

Emissions Calculations - Excavators

Hp	2020 Composite
Hours of Operaton per Day	11
Number	2
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

As you can see in the excerpts above, the Project operational is anticipated to utilize three loaders, one bobcat (skid steer loader), one telehandler (forklift), and two excavators. However, review of the Project's CalEEMod output files demonstrates that the model fails to include any pieces of operational off-road equipment (see excerpt below) (Appendix CM-1, pp. 50).

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	0	8.00	300	0	0.95	Diesel
Skid Steer Loaders	0	8.00	300	0	0.95	Diesel

As you can see if the excerpt above, the model fails to include any operational off-road equipment. By failing to include any number of operational off-road equipment, the model is inconsistent with the information provided in the IS/MND and FIS/MND and underestimates the Project's operational emissions related to off-road equipment.

Unsubstantiated Changes to Operational Off-Road Equipment Horsepower Values

Review of the Project's CalEEMod output files demonstrates that the model includes manual reductions to the Project's anticipated operational off-road equipment horsepower values (see excerpt below) (Appendix CM-1, pp. 25).

Table Name	Column Name	Default Value	New Value
tblOperationalOffRoadEquipment	OperHorsePower	203.00	0.00
tblOperationalOffRoadEquipment	OperHorsePower	65.00	0.00

As you can see in the excerpt above, the operational off-road equipment horsepower values were reduced to zero in the model. As previously mentioned, the CalEEMod User's Guide requires any

changes to model defaults be justified.[3] According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Solid waste facility permit" (Appendix CM-I, pp. 24). However, the FIS/MND and IS/MND fail to mention or justify any numerical values for operational off-road equipment horsepower values whatsoever. Thus, we cannot verify the revised values in the model. By incorrectly reducing the Project's anticipated operational off-road construction equipment horsepower values to zero, the model underestimates the Project's operational emissions related to off-road equipment and should not be relied upon to determine Project significance.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to determine the operational emissions associated with Project, we prepared updated CalEEMod models, using the Project-specific information provided by the FIS/MND. In our updated models, we corrected the Sunday trip rate, included the correct number of pieces of operational off-road equipment, and omitted the unsubstantiated reductions to the operational off-road equipment horsepower values.

Our updated analysis demonstrates that, when modeled using corrected input parameters, the nitrogen oxides ("NO_x") emissions associated with operation of the Project exceed the 55 pounds per day ("lbs/day") threshold set by the SCAQMD.[4]

Model	NO_X
Operation (FIS/MND)	25.34
Operation (SWAPE)	72.42
% Change	186%
SCAQMD Regional Threshold (lbs/day)	**55**
Threshold Exceeded?	***Yes***

As demonstrated above, when modeled correctly, the NO_x emissions increase by 186% and exceed the SCAQMD threshold of 55 lbs/day. Thus, our model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the FIS/MND. As a result, an EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the surrounding environment.

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The FIS/MND and IS/MND conclude that the Project's health risk impacts would be less than significant as a result of a localized significance threshold ("LST") analysis, without conducting a quantified operational health risk assessment ("HRA"). Specifically, regarding the Project's LST analysis, the FIS/MND states:

[3] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 2, 9
[4] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, Revised April 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf

> "[O]perational emissions would not exceed LSTs significance thresholds for NOx, CO, PM10, and PM2.5 emissions. Therefore, the proposed project's operational impacts on LSTs are considered less than significant" (p. CM-8).

Furthermore, regarding the Project's potential health risk impacts, the IS/MND concludes the project will not expose sensitive receptors to substantial pollutant concentrations because "[t]he site is over 1,000 feet from residences" (p. 19). However, the Project's health risk analysis, as well as the subsequent less-than-significant impact conclusion, are incorrect for three reasons.

First, the use of the LST method to determine the significance of the health risk impacts posed to nearby, existing sensitive receptors is incorrect. While the LST method assesses the impact of pollutants at a local level, it only evaluates impacts from criteria air pollutants. According to the *Final Localized Significance Threshold Methodology* document prepared by the SCAQMD, the LST analysis is only applicable to NO_x, CO, PM_{10}, and $PM_{2.5}$ emissions, which are collectively referred to as criteria air pollutants.[5] Because the LST method can only be applied to criteria air pollutants, this method cannot be used to determine whether emissions from toxic air contaminants ("TACs"), specifically diesel particulate matter ("DPM"), a known human carcinogen, will result in a significant health risk impact to nearby sensitive receptors. As a result, health impacts from exposure to TACs, such as DPM, were not analyzed, thus leaving a gap in the IS/MND and FIS/MND's analyses.

Second, the FIS/MND fails to prepare a quantified operational HRA. This is incorrect, as the FIS/MND indicates that Project operation would generate 274 daily vehicle trips, which will generate additional exhaust emissions and continue to expose nearby sensitive receptors to DPM emissions (p. RTC-29). Simply because the Project site is located over 1,000 feet from residences does not justify the omission of a quantified operational HRA. By failing to prepare a quantified operational HRA, the Project is inconsistent with the most recent guidance published by the Office of Environmental Health Hazard Assessment ("OEHHA"). The OEHHA document recommends that exposure from projects lasting more than 6 months be evaluated for the duration of the project, and recommends that an exposure duration of 30 years be used to estimate individual cancer risk for the maximally exposed individual resident ("MEIR").[6] Even though we were not provided with the expected lifetime of the Project, we can reasonably assume that the Project will operate for at least 30 years, if not more. Therefore, we recommend that health risk impacts from Project operation also be evaluated, as a 30-year exposure duration vastly exceeds the 6-month requirement set forth by OEHHA. These recommendations reflect the most recent state health risk policies, and as such, we recommend that an updated assessment of health risk impacts posed to nearby sensitive receptors from Project operation be included in an EIR for the Project.

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[5] "Final Localized Significance Threshold Methodology." SCAQMD, Revised July 2008, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

[6] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf, p. 8-6, 8-15

Third, by claiming a less than significant impact without conducting a quantified HRA to disclose the exposure levels to nearby, existing sensitive receptors as a result of Project operation, the FIS/MND fails to compare the excess health risk to the SCAQMD's specific numeric threshold of 10 in one million.[7] Thus, the FIS/MND cannot conclude less than significant health risk impacts resulting from Project operation without quantifying emissions to compare to the proper threshold.

Screening-Level Analysis Demonstrates Significant Impacts

In an effort to demonstrate the potential health risk posed by Project operation to nearby, existing sensitive receptors utilizing a site-specific emissions estimates, we prepared a simple screening-level HRA. The results of our assessment as described below, demonstrate that the proposed Project may result in a significant impact not previously identified or addressed in the IS/MND.

In order to conduct our screening-level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.[8] The model replaced SCREEN3, and AERSCREEN is included in the OEHHA[9] and the California Air Pollution Control Officers Associated ("CAPCOA")[10] guidance as the appropriate air dispersion model for Level 2 health risk screening assessments ("HRSAs"). A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

We prepared a preliminary HRA to quantify the health risk impact posed to residential sensitive receptors by Project operation using the annual PM_{10} exhaust estimates from SWAPE's updated CalEEMod output files. Consistent with recommendations set forth by OEHHA, we assumed residential exposure begins during the third trimester stage of life. As the proposed Project does not include the construction of any additional floor area, we assumed that the sensitive receptor would be exposed to the Project's operational DPM for the total residential duration of 30 years. SWAPE's updated operational CalEEMod emissions indicate that operational activities will generate 632 pounds of DPM per year throughout operation. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project operation, we calculated an average DPM emission rate by the following equation:

$$Emission\ Rate\ \left(\frac{grams}{second}\right) = \frac{632\ lbs}{365\ days} \times \frac{453.6\ grams}{lbs} \times \frac{1\ day}{24\ hours} \times \frac{1\ hour}{3{,}600\ seconds} = \mathbf{0.00909\ g/s}$$

[7] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[8] U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model, http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf
[9] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf
[10] CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

Using this equation, we estimated an operational emission rate of 0.00909 g/s. Operational activity was simulated as a 1.24-acre rectangular area source in AERSCREEN with dimensions of 88 by 57 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.[11] According to the IS/MND, the nearest sensitive receptors are located approximately 1,000 feet, or 305 meters, from the Project boundary (p. 19). Thus, the single-hour concentration estimated by AERSCREEN for Project operation is approximately 2.406 $\mu g/m^3$ DPM at approximately 300 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.2406 $\mu g/m^3$ for Project operation at the nearest sensitive receptor.

We calculated the excess cancer risk to the nearest sensitive receptor using applicable HRA methodologies prescribed by OEHHA. Because the Project would not include the construction of any additional floor area, the annualized average concentration for Project operation was used for the entire 30-year exposure period, including the entire third trimester of pregnancy (0.25 years), infantile stage of life (0 – 2 years), child stage of life (2 – 16 years), and adult stage of life (16 – 30 years).

Consistent with OEHHA, as recommended by the SCAQMD, BAAQMD, and SJVAPCD guidance, we used Age Sensitivity Factors ("ASF") to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.[12, 13, 14] According to this guidance, the quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant) as well as multiplied by a factor of three during the child stage of life (2 – 16 years). We also included the quantified cancer risk without adjusting for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution in accordance with older OEHHA guidance from 2003. This

[11] "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised." EPA, 1992, *available at*: http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf; *see also* "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 4-36.

[12] "Draft Environmental Impact Report (DEIR) for the Proposed The Exchange (SCH No. 2018071058)." SCAQMD, March 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/march/RVC190115-03.pdf?sfvrsn=8, p. 4.

[13] "California Environmental Quality Act Air Quality Guidelines." BAAQMD, May 2017, *available at:* http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, p. 56; see also "Recommended Methods for Screening and Modeling Local Risks and Hazards." BAAQMD, May 2011, *available at:* http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx, p. 65, 86.

[14] "Update to District's Risk Management Policy to Address OEHHA's Revised Risk Assessment Guidance Document." SJVAPCD, May 2015, *available at:* https://www.valleyair.org/busind/pto/staff-report-5-28-15.pdf, p. 8, 20, 24.

guidance utilizes a less health protective scenario than what is currently recommended by SCAQMD, the air quality district with jurisdiction over the City, and several other air districts in the state. Furthermore, in accordance with the guidance set forth by OEHHA, we used the 95th percentile breathing rates for infants.[15] Finally, according to SCAQMD guidance, we used a Fraction of Time At Home ("FAH") Value of 1 for the 3rd trimester and infant receptors.[16] We used a cancer potency factor of 1.1 $(mg/kg\text{-}day)^{-1}$ and an averaging time of 25,550 days. The results of our calculations are shown below.

The Closest Exposed Individual at an Existing Residential Receptor

Activity	Duration (years)	Concentration (ug/m3)	Breathing Rate (L/kg-day)	Cancer Risk without ASFs*	ASF	Cancer Risk with ASFs*
Operation	0.25	0.2406	361	3.3E-07	10	3.3E-06
3rd Trimester Duration	***0.25***			***3.3E-07***	***3rd Trimester Exposure***	***3.3E-06***
Operation	2.00	0.2406	1090	7.9E-06	10	7.9E-05
Infant Exposure Duration	***2.00***			***7.9E-06***	***Infant Exposure***	***7.9E-05***
Operation	14.00	0.2406	572	2.9E-05	3	8.7E-05
Child Exposure Duration	***14.00***			***2.9E-05***	***Child Exposure***	***8.7E-05***
Operation	14.00	0.2406	261	9.7E-06	1	9.7E-06
Adult Exposure Duration	***14.00***			***9.7E-06***	***Adult Exposure***	***9.7E-06***
Lifetime Exposure Duration	**30.00**			**4.7E-05**	**Lifetime Exposure**	**1.8E-04**

* We, along with CARB and SCAQMD, recommend using the more updated and health protective 2015 OEHHA guidance, which includes ASFs.

As demonstrated in the table above, the excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the nearest sensitive receptor, located approximately 300 meters away, over the course of Project operation, utilizing age sensitivity factors, are approximately 9.7, 87, 79, and 3.3 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), utilizing age sensitivity factors, is approximately 180 in one million. The infant, child, and lifetime cancer

[15] "Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act," July 2018, *available at:* http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588supplementalguidelines.pdf, p. 16.
"Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf
[16] "Risk Assessment Procedures for Rules 1401, 1401.1, and 212." SCAQMD, August 2017, *available at:* http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

risks all exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the IS/MND or FIS/MND. Utilizing age sensitivity factors is the most conservative, health-protective analysis according to the most recent guidance by OEHHA and reflects recommendations from the air district. Results without age sensitivity factors are presented in the table above, although we **do not** recommend utilizing these values for health risk analysis. Regardless, the excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the nearest sensitive receptor located approximately 300 meters away, over the course of Project operation, without age sensitivity factors, are approximately 9.7, 29, 7.9, and 0.33 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), without age sensitivity factors, is approximately 47 in one million. The child and lifetime cancer risks, without age sensitivity factors, exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the IS/MND or FIS/MND. While we recommend the use of age sensitivity factors, health risk impacts exceed the SCAQMD threshold regardless.

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection. [17] The purpose of the screening-level operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. Our screening-level HRA demonstrates that operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. Therefore, since our screening-level HRA indicates a potentially significant impact, the City should prepare a Project-specific EIR with an HRA which makes a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors.

Greenhouse Gas

Failure to Evaluate Greenhouse Gas Impacts

The IS/MND and FIS/MND fail to quantify the Project's potential greenhouse gas ("GHG") impacts whatsoever. According to the IS/MND:

> "The proposed project, will allow increased CDI, greenwaste and organics processing within the project site and assist in the City's waste diversion objectives which will have a beneficial impact with respect to energy conservation and GHG reduction. Finally, *the proposed project's operational emissions*, and the use of natural gas-powered collection and processing vehicles, *will result in GHG levels below those considered by the SCAQMD to represent a significant impact*. As a result, the impacts related to additional greenhouse gas emissions will be less than significant" (p. 38).

As you can see in the excerpt above, the IS/MND concludes the Project's GHG emissions would not exceed the SCAQMD thresholds of significance, without quantifying the Project's GHG emissions to

[17] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 1-5

compare to the proper threshold. However, the IS/MND and FIS/MND's analyses of the Project's GHG emissions, as well as the subsequent less-than-significant GHG impact conclusion, are incorrect for two reasons.

First, by failing to evaluate the Project's potential GHG emissions, the Project is inconsistent with CEQA. Specifically, according to CEQA Guidelines § 15064.4(a):

> "A lead agency should make a good-faith effort, based on available information, to *describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project*" (emphasis added).[18]

As you can see in the excerpt above, lead agencies are obligated under CEQA to evaluate the potential GHG emissions resulting from a proposed project. Here, however, the IS/MND and FIS/MND fail to provide any quantitative analysis of the Project's GHG emissions. As such, we recommend that an EIR be prepared to adequately assess and mitigate the potential GHG impacts that the project may have on the surrounding environment.

Second, the Project's emissions, as modeled by SWAPE using project-specific information available in the IS/MND and FIS/MND, indicate a potentially significant impact when applying the relevant SCAQMD efficiency threshold of 3.0 metric tons of carbon dioxide equivalents per service population per year ("MT CO_2e/SP/year") for the year 2035.[19] Specifically, SWAPE's CalEEMod output files disclose approximately 3,189.86 MT CO_2e/year of annual operational emissions (sum of area, energy, mobile, off-road, waste, and water-related emissions). Furthermore, according to CAPCOA's *CEQA & Climate Change* report, service population is defined as "the sum of the number of residents and the number of jobs supported by the project."[20] However, the FIS/MND fails to provide the estimated number of jobs supported by the Project. As such, we estimated the proposed Project's service population based on SCAG's *Employment Density Study Summary Report*. According to SCAG's *Employment Density Study Summary Report*, the average Square Feet/Employee ("SF/Employee") value for "Heavy Manufactoring" in Los Angeles County is 602 SF/Employee.[21] As such, we estimate that the Project would create approximately 90 new employees.[22] As the Project does not include any residential land uses, we estimate a service population of approximately 90 people.[23] Dividing the Project's GHG emissions,

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[18] "CEQA and Climate Change." Governor's Office of Planning and Research ("OPR"), *available at:* https://opr.ca.gov/ceqa/climate-change.html.
[19] "Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15." SCAQMD, September 2010, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf, p. 2.
[20] CAPCOA (Jan. 2008) CEQA & Climate Change, p. 71-72, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf.
[21] "EMPLOYMENT DENSITY STUDY SUMMARY REPORT." Southern California Association of Governments ("SCAG"), October 2001, *available at:* http://www.mwcog.org/file.aspx?A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D, p. 18, Table 4B.
[22] Calculated: (54,000-SF) / (602 SF/employee) = 90 employees.
[23] Calculated: 90 employees + 0 residents = 90 people.

estimated by SWAPE's updated CalEEMod model, by a service population value of 90 people, we find that the Project would emit approximately 35.4 MT CO_2e/SP/year (see table below).[24]

SWAPE Service Population Efficiency	
Project Phase	**Proposed Project (MT CO_2e/year)**
Area	0.00
Energy	386.99
Mobile	1,651.89
Off-road	1,009.55
Waste	33.67
Water	107.74
Total	**3,189.86**
Service Population	90.00
Service Population Efficiency	**35.4**
Threshold	3
Consistent?	***No***

When we compare the Project's per service population GHG emissions to the SCAQMD 2035 efficiency target of 3.0 MT CO_2e/SP/year, we find that the Project would result in a significant GHG impact not previously identified or addressed by the IS/MND or FIS/MND. According to CEQA Guidelines § 15064.4(b), if there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, a full CEQA analysis must be prepared for the project. Therefore, a Project-specific EIR should be prepared and recirculated for the Project, and mitigation should be implemented where necessary, per CEQA Guidelines.

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project's air quality, health risk, and GHG emissions may result in significant impacts and may mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*.[25] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

[24] Calculated: (3,189.86 MT CO_2e/year) / (90 service population) = (35.4 MT CO_2e/SP/year).
[25] http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*[26]
Measures – Energy
Building Energy Use
Exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code)
Install Programmable Thermostat Timers
Obtain Third-party HVAC Commissioning and Verification of Energy Savings
Install Energy Efficient Appliances
Install Energy Efficient Boilers
Lighting
Limit Outdoor Lighting Requirements
Alternative Energy Generation
Establish Onsite Renewable or Carbon-Neutral Energy Systems
Establish Onsite Renewable Energy System – Solar Power
Establish Onsite Renewable Energy System – Wind Power
Measures – Transportation
Land Use/Location
Increase Density
Increase Location Efficiency
Increase Destination Accessibility
Increase Transit Accessibility
Orient Project Toward Non-Auto Corridor
Locate Project near Bike Path/Bike Lane
Neighborhood/Site Enhancements
Provide Pedestrian Network Improvements, such as: • Compact, mixed-use communities • Interconnected street network • Narrower roadways and shorter block lengths • Sidewalks • Accessibility to transit and transit shelters • Traffic calming measures and street trees • Parks and public spaces • Minimize pedestrian barriers
Provide Traffic Calming Measures, such as: • Marked crosswalks • Count-down signal timers • Curb extensions

[26] "Quantifying Greenhouse Gas Mitigation Measures." California Air Pollution Control Officers Association (CAPCOA), August 2010, *available at:* http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, p.

• Speed tables • Raised crosswalks • Raised intersections • Median islands • Tight corner radii • Roundabouts or mini-circles • On-street parking • Planter strips with trees • Chicanes/chokers
Implement a Neighborhood Electric Vehicle (NEV) Network.
Incorporate Bike Lane Street Design (on-site)
Provide Bike Parking in Non-Residential Projects
Provide Electric Vehicle Parking
Dedicate Land for Bike Trails
Parking Policy/Pricing
Limit Parking Supply through: • Elimination (or reduction) of minimum parking requirements • Creation of maximum parking requirements • Provision of shared parking
Unbundle Parking Costs from Property Cost
Implement Market Price Public Parking (On-Street)
Require Residential Area Parking Permits
Commute Trip Reduction Programs
Implement Commute Trip Reduction (CTR) Program – Voluntary • Carpooling encouragement • Ride-matching assistance • Preferential carpool parking • Flexible work schedules for carpools • Half time transportation coordinator • Vanpool assistance • Bicycle end-trip facilities (parking, showers and lockers) • New employee orientation of trip reduction and alternative mode options • Event promotions and publications • Flexible work schedule for employees • Transit subsidies • Parking cash-out or priced parking • Shuttles • Emergency ride home
Implement Commute Trip Reduction (CTR) Program – Required Implementation/Monitoring • Established performance standards (e.g. trip reduction requirements) • Required implementation • Regular monitoring and reporting

Provide Ride-Sharing Programs • Designate a certain percentage of parking spaces for ride sharing vehicles • Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles • Providing a web site or messaging board for coordinating rides • Permanent transportation management association membership and funding requirement.
Implement Subsidized or Discounted Transit Program
Provide Ent of Trip Facilities, including: • Showers • Secure bicycle lockers • Changing spaces
Encourage Telecommuting and Alternative Work Schedules, such as: • Staggered starting times • Flexible schedules • Compressed work weeks
Implement Commute Trip Reduction Marketing, such as: • New employee orientation of trip reduction and alternative mode options • Event promotions • Publications
Implement Preferential Parking Permit Program
Implement Car-Sharing Program
Implement School Pool Program
Provide Employer-Sponsored Vanpool/Shuttle
Implement Bike-Sharing Programs
Price Workplace Parking, such as: • Explicitly charging for parking for its employees; • Implementing above market rate pricing; • Validating parking only for invited guests; • Not providing employee parking and transportation allowances; and • Educating employees about available alternatives.
Implement Employee Parking “Cash-Out”
Transit System Improvements
Transit System Improvements, including: • Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route. • Frequent, high-capacity service • High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride. • Pre-paid fare collection to minimize boarding delays. • Integrated fare systems, allowing free or discounted transfers between routes and modes. • Convenient user information and marketing programs. • High quality bus stations with Transit Oriented Development in nearby areas.

• Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.
Implement Transit Access Improvements, such as: • Sidewalk/crosswalk safety enhancements • Bus shelter improvements
Expand Transit Network
Increase Transit Service Frequency/Speed
Provide Bike Parking Near Transit
Provide Local Shuttles
Road Pricing/Management
Implement Area or Cordon Pricing
Improve Traffic Flow, such as: • Signalization improvements to reduce delay; • Incident management to increase response time to breakdowns and collisions; • Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and • Speed management to reduce high free-flow speeds.
Required Project Contributions to Transportation Infrastructure Improvement Projects
Install Park-and-Ride Lots
Vehicles
Electrify Loading Docs and/or Require Idling-Reduction Systems
Utilize Alternative Fueled Vehicles, such as: • Biodiesel (B20) • Liquefied Natural Gas (LNG) • Compressed Natural Gas (CNG)
Utilize Electric or Hybrid Vehicles
Measures – Water
Water Supply
Use Reclaimed Water
Use Gray Water
Use Locally Sourced Water Supply
Water Use
Install Low-Flow Water Fixtures
Adopt a Water Conservation strategy
Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as: • Reducing lawn sizes; • Planting vegetation with minimal water needs, such as native species;

• Choosing vegetation appropriate for the climate of the project site; • Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water.
Use Water-Efficient Landscape Irrigation Systems (“Smart” irrigation control systems)
Reduce Turf in Landscapes and Lawns
Plant Native or Drought-Resistant Trees and Vegetation
Measures – Area Landscaping
Landscaping Equipment
Prohibit Gas Powered Landscape Equipment
Implement Lawnmower Exchange Program
Electric Yard Equipment Compatibility
Measures – Solid Waste
Solid Waste
Institute Recycling and Composting Services
Measures – Vegetation
Vegetation
Urban Tree Planting
Create New Vegetated Open Space
Measures – Miscellaneous
Miscellaneous
Establish a Carbon Sequestration Project, such as: • Geologic sequestration or carbon capture and storage techniques, in which CO_2 from point sources is captured and injected underground; • Terrestrial sequestration in which ecosystems are established or preserved to serve as CO_2 sinks; • Novel techniques involving advanced chemical or biological pathways; or • Technologies yet to be discovered.
Establish Off-Site Mitigation
Use Local and Sustainable Building Materials
Require best Management Practices in Agriculture and Animal Operations
Require Environmentally Responsible Purchasing, such as: • Purchasing products with sustainable packaging; • Purchasing post-consumer recycled copier paper, paper towels, and stationary; • Purchasing and stocking communal kitchens with reusable dishes and utensils; • Choosing sustainable cleaning supplies; • Leasing equipment from manufacturers who will recycle the components at their end of life; • Choosing ENERGY STAR appliances and Water Sense-certified water fixtures; • Choosing electronic appliances with built in sleep-mode timers; • Purchasing ‘green power’ (e.g. electricity generated from renewable or hydropower) from the utility; and • Choosing locally-made and distributed products.

Implement an Innovative Strategy for GHG Mitigation
Measures – General Plans
General Plans
Fund Incentives for Energy Efficiency, such as: • Retrofitting or designing new buildings, parking lots, streets, and public areas with energy-efficient lighting; • Retrofitting or designing new buildings with low-flow water fixtures and high-efficiency appliances; • Retrofitting or purchasing new low-emissions equipment; • Purchasing electric or hybrid vehicles; • Investing in renewable energy systems
Establish a Local Farmer's Market
Establish Community Gardens
Plant Urban Shade Trees
Implement Strategies to Reduce Urban Heat-Island Effect, such as: • Planting urban shade trees; • Installing reflective roofs; and • Using light-colored or high-albedo pavements and surfaces.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project operation. An EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Direct Disposal Transfer Processing Facility

South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	54.00	1000sqft	1.24	54,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	12			**Operational Year**	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Annual

Project Characteristics - Consistent with the FIS/MND's model.

Land Use - Consistent with the FIS/MND's model.

Construction Phase - Consistent with the FIS/MND's model. No construction.

Off-road Equipment - Consistent with the FIS/MND's model. No construction.

Grading -

Trips and VMT - Consistent with the FIS/MND's model. No construction.

Vehicle Trips - Consistent with the FIS/MND's model. See SWAPE comment regarding Sunday trip rate.

Fleet Mix - Consistent with the FIS/MND's model.

Energy Use -

Operational Off-Road Equipment - Consistent with the Equipment Emissions Calculations (FIS/MND, pp. 20-22). Load factor consistent with the FIS/MND's model. See SWAPE comment regarding horsepower values.

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.20
tblFleetMix	LDA	0.55	0.20
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LHD1	0.02	0.20
tblFleetMix	LHD2	5.8620e-003	0.20
tblFleetMix	MCY	4.7770e-003	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	9.5600e-004	0.00
tblFleetMix	MHD	0.02	0.20
tblFleetMix	OBUS	2.0370e-003	0.00
tblFleetMix	SBUS	7.0500e-004	0.00
tblFleetMix	UBUS	1.9440e-003	0.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00

tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.36	0.95
tblOperationalOffRoadEquipment	OperLoadFactor	0.37	0.95
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	3.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	1.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	1.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	2.00
tblVehicleTrips	CC_TL	8.40	20.00
tblVehicleTrips	CC_TTP	28.00	80.00
tblVehicleTrips	CNW_TTP	13.00	5.00
tblVehicleTrips	CW_TTP	59.00	15.00
tblVehicleTrips	DV_TP	5.00	2.50
tblVehicleTrips	PB_TP	3.00	2.50
tblVehicleTrips	PR_TP	92.00	95.00
tblVehicleTrips	ST_TR	1.50	5.07
tblVehicleTrips	SU_TR	1.50	5.07
tblVehicleTrips	WD_TR	1.50	5.07

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	1.1800e-003	0.0114	7.7200e-003	1.0000e-005	7.0000e-005	6.4000e-004	7.2000e-004	2.0000e-005	6.0000e-004	6.2000e-004	0.0000	1.1371	1.1371	2.7000e-004	0.0000	1.1439
2020	0.4976	1.8817	1.6521	3.0700e-003	0.0491	0.0963	0.1455	0.0170	0.0925	0.1095	0.0000	259.9042	259.9042	0.0443	0.0000	261.0110
Maximum	**0.4976**	**1.8817**	**1.6521**	**3.0700e-003**	**0.0491**	**0.0963**	**0.1455**	**0.0170**	**0.0925**	**0.1095**	**0.0000**	**259.9042**	**259.9042**	**0.0443**	**0.0000**	**261.0110**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	1.1800e-003	0.0114	7.7200e-003	1.0000e-005	7.0000e-005	6.4000e-004	7.2000e-004	2.0000e-005	6.0000e-004	6.2000e-004	0.0000	1.1371	1.1371	2.7000e-004	0.0000	1.1439
2020	0.4976	1.8817	1.6521	3.0700e-003	0.0491	0.0963	0.1455	0.0170	0.0925	0.1095	0.0000	259.9039	259.9039	0.0443	0.0000	261.0107
Maximum	**0.4976**	**1.8817**	**1.6521**	**3.0700e-003**	**0.0491**	**0.0963**	**0.1455**	**0.0170**	**0.0925**	**0.1095**	**0.0000**	**259.9039**	**259.9039**	**0.0443**	**0.0000**	**261.0107**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	12-31-2019	3-30-2020	0.6354	0.6354
2	3-31-2020	6-29-2020	0.5839	0.5839
3	6-30-2020	9-29-2020	0.5903	0.5903
		Highest	0.6354	0.6354

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.2202	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.3400e-003	1.3400e-003	0.0000	0.0000	1.4300e-003
Energy	5.2700e-003	0.0479	0.0403	2.9000e-004		3.6400e-003	3.6400e-003		3.6400e-003	3.6400e-003	0.0000	386.0005	386.0005	8.8800e-003	2.5900e-003	386.9937
Mobile	0.2049	4.6350	1.8933	0.0174	0.7664	0.0354	0.8019	0.2168	0.0338	0.2506	0.0000	1,650.3292	1,650.3292	0.0626	0.0000	1,651.8938
Offroad	0.6420	7.3443	4.4404	0.0114		0.2770	0.2770		0.2548	0.2548	0.0000	1,001.4571	1,001.4571	0.3239	0.0000	1,009.5544
Waste						0.0000	0.0000		0.0000	0.0000	13.5923	0.0000	13.5923	0.8033	0.0000	33.6743
Water						0.0000	0.0000		0.0000	0.0000	3.9617	90.5618	94.5235	0.4090	0.0101	107.7446
Total	**1.0724**	**12.0272**	**6.3746**	**0.0290**	**0.7664**	**0.3160**	**1.0825**	**0.2168**	**0.2923**	**0.5091**	**17.5540**	**3,128.3500**	**3,145.9040**	**1.6077**	**0.0126**	**3,189.8622**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.2202	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.3400e-003	1.3400e-003	0.0000	0.0000	1.4300e-003
Energy	5.2700e-003	0.0479	0.0403	2.9000e-004		3.6400e-003	3.6400e-003		3.6400e-003	3.6400e-003	0.0000	386.0005	386.0005	8.8800e-003	2.5900e-003	386.9937
Mobile	0.2049	4.6350	1.8933	0.0174	0.7664	0.0354	0.8019	0.2168	0.0338	0.2506	0.0000	1,650.3292	1,650.3292	0.0626	0.0000	1,651.8938
Offroad	0.6420	7.3443	4.4404	0.0114		0.2770	0.2770		0.2548	0.2548	0.0000	1,001.4571	1,001.4571	0.3239	0.0000	1,009.5544
Waste						0.0000	0.0000		0.0000	0.0000	13.5923	0.0000	13.5923	0.8033	0.0000	33.6743
Water						0.0000	0.0000		0.0000	0.0000	3.9617	90.5618	94.5235	0.4090	0.0101	107.7446
Total	**1.0724**	**12.0272**	**6.3746**	**0.0290**	**0.7664**	**0.3160**	**1.0825**	**0.2168**	**0.2923**	**0.5091**	**17.5540**	**3,128.3500**	**3,145.9040**	**1.6077**	**0.0126**	**3,189.8622**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	12/31/2019	1/27/2020	5	20	
2	Site Preparation	Site Preparation	1/28/2020	1/29/2020	5	2	
3	Grading	Grading	1/30/2020	2/4/2020	5	4	
4	Building Construction	Building Construction	2/5/2020	11/10/2020	5	200	
5	Paving	Paving	11/11/2020	11/24/2020	5	10	
6	Architectural Coating	Architectural Coating	11/25/2020	12/8/2020	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 81,000; Non-Residential Outdoor: 27,000; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	23.00	9.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.1500e-003	0.0113	7.4500e-003	1.0000e-005		6.4000e-004	6.4000e-004		6.0000e-004	6.0000e-004	0.0000	1.0708	1.0708	2.7000e-004	0.0000	1.0776
Total	**1.1500e-003**	**0.0113**	**7.4500e-003**	**1.0000e-005**		**6.4000e-004**	**6.4000e-004**		**6.0000e-004**	**6.0000e-004**	**0.0000**	**1.0708**	**1.0708**	**2.7000e-004**	**0.0000**	**1.0776**

3.2 Demolition - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	2.0000e-005	2.7000e-004	0.0000	7.0000e-005	0.0000	7.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0663	0.0663	0.0000	0.0000	0.0663
Total	**3.0000e-005**	**2.0000e-005**	**2.7000e-004**	**0.0000**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0663**	**0.0663**	**0.0000**	**0.0000**	**0.0663**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.1500e-003	0.0113	7.4500e-003	1.0000e-005		6.4000e-004	6.4000e-004		6.0000e-004	6.0000e-004	0.0000	1.0708	1.0708	2.7000e-004	0.0000	1.0776
Total	**1.1500e-003**	**0.0113**	**7.4500e-003**	**1.0000e-005**		**6.4000e-004**	**6.4000e-004**		**6.0000e-004**	**6.0000e-004**	**0.0000**	**1.0708**	**1.0708**	**2.7000e-004**	**0.0000**	**1.0776**

3.2 Demolition - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	2.0000e-005	2.7000e-004	0.0000	7.0000e-005	0.0000	7.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0663	0.0663	0.0000	0.0000	0.0663
Total	**3.0000e-005**	**2.0000e-005**	**2.7000e-004**	**0.0000**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0663**	**0.0663**	**0.0000**	**0.0000**	**0.0663**

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0202	0.1990	0.1392	2.3000e-004		0.0110	0.0110		0.0102	0.0102	0.0000	20.0143	20.0143	5.1400e-003	0.0000	20.1429
Total	**0.0202**	**0.1990**	**0.1392**	**2.3000e-004**		**0.0110**	**0.0110**		**0.0102**	**0.0102**	**0.0000**	**20.0143**	**20.0143**	**5.1400e-003**	**0.0000**	**20.1429**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.5000e-004	4.2000e-004	4.6800e-003	1.0000e-005	1.3500e-003	1.0000e-005	1.3700e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2198	1.2198	4.0000e-005	0.0000	1.2206
Total	**5.5000e-004**	**4.2000e-004**	**4.6800e-003**	**1.0000e-005**	**1.3500e-003**	**1.0000e-005**	**1.3700e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2198**	**1.2198**	**4.0000e-005**	**0.0000**	**1.2206**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0202	0.1990	0.1392	2.3000e-004		0.0110	0.0110		0.0102	0.0102	0.0000	20.0143	20.0143	5.1400e-003	0.0000	20.1429
Total	**0.0202**	**0.1990**	**0.1392**	**2.3000e-004**		**0.0110**	**0.0110**		**0.0102**	**0.0102**	**0.0000**	**20.0143**	**20.0143**	**5.1400e-003**	**0.0000**	**20.1429**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.5000e-004	4.2000e-004	4.6800e-003	1.0000e-005	1.3500e-003	1.0000e-005	1.3700e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2198	1.2198	4.0000e-005	0.0000	1.2206
Total	**5.5000e-004**	**4.2000e-004**	**4.6800e-003**	**1.0000e-005**	**1.3500e-003**	**1.0000e-005**	**1.3700e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2198**	**1.2198**	**4.0000e-005**	**0.0000**	**1.2206**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.8000e-003	0.0000	5.8000e-003	2.9500e-003	0.0000	2.9500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0184	7.7100e-003	2.0000e-005		8.2000e-004	8.2000e-004		7.6000e-004	7.6000e-004	0.0000	1.5127	1.5127	4.9000e-004	0.0000	1.5249
Total	**1.6300e-003**	**0.0184**	**7.7100e-003**	**2.0000e-005**	**5.8000e-003**	**8.2000e-004**	**6.6200e-003**	**2.9500e-003**	**7.6000e-004**	**3.7100e-003**	**0.0000**	**1.5127**	**1.5127**	**4.9000e-004**	**0.0000**	**1.5249**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	3.0000e-005	3.0000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0790	0.0790	0.0000	0.0000	0.0791
Total	**4.0000e-005**	**3.0000e-005**	**3.0000e-004**	**0.0000**	**9.0000e-005**	**0.0000**	**9.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0790**	**0.0790**	**0.0000**	**0.0000**	**0.0791**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.8000e-003	0.0000	5.8000e-003	2.9500e-003	0.0000	2.9500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0184	7.7100e-003	2.0000e-005		8.2000e-004	8.2000e-004		7.6000e-004	7.6000e-004	0.0000	1.5127	1.5127	4.9000e-004	0.0000	1.5249
Total	**1.6300e-003**	**0.0184**	**7.7100e-003**	**2.0000e-005**	**5.8000e-003**	**8.2000e-004**	**6.6200e-003**	**2.9500e-003**	**7.6000e-004**	**3.7100e-003**	**0.0000**	**1.5127**	**1.5127**	**4.9000e-004**	**0.0000**	**1.5249**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	3.0000e-005	3.0000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0790	0.0790	0.0000	0.0000	0.0791
Total	**4.0000e-005**	**3.0000e-005**	**3.0000e-004**	**0.0000**	**9.0000e-005**	**0.0000**	**9.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0790**	**0.0790**	**0.0000**	**0.0000**	**0.0791**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.8300e-003	0.0000	9.8300e-003	5.0500e-003	0.0000	5.0500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7000e-003	0.0302	0.0129	3.0000e-005		1.3700e-003	1.3700e-003		1.2600e-003	1.2600e-003	0.0000	2.4779	2.4779	8.0000e-004	0.0000	2.4980
Total	**2.7000e-003**	**0.0302**	**0.0129**	**3.0000e-005**	**9.8300e-003**	**1.3700e-003**	**0.0112**	**5.0500e-003**	**1.2600e-003**	**6.3100e-003**	**0.0000**	**2.4779**	**2.4779**	**8.0000e-004**	**0.0000**	**2.4980**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.0000e-005	5.0000e-005	6.1000e-004	0.0000	1.8000e-004	0.0000	1.8000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1580	0.1580	0.0000	0.0000	0.1581
Total	**7.0000e-005**	**5.0000e-005**	**6.1000e-004**	**0.0000**	**1.8000e-004**	**0.0000**	**1.8000e-004**	**5.0000e-005**	**0.0000**	**5.0000e-005**	**0.0000**	**0.1580**	**0.1580**	**0.0000**	**0.0000**	**0.1581**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.8300e-003	0.0000	9.8300e-003	5.0500e-003	0.0000	5.0500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7000e-003	0.0302	0.0129	3.0000e-005		1.3700e-003	1.3700e-003		1.2600e-003	1.2600e-003	0.0000	2.4779	2.4779	8.0000e-004	0.0000	2.4980
Total	**2.7000e-003**	**0.0302**	**0.0129**	**3.0000e-005**	**9.8300e-003**	**1.3700e-003**	**0.0112**	**5.0500e-003**	**1.2600e-003**	**6.3100e-003**	**0.0000**	**2.4779**	**2.4779**	**8.0000e-004**	**0.0000**	**2.4980**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.0000e-005	5.0000e-005	6.1000e-004	0.0000	1.8000e-004	0.0000	1.8000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1580	0.1580	0.0000	0.0000	0.1581
Total	**7.0000e-005**	**5.0000e-005**	**6.1000e-004**	**0.0000**	**1.8000e-004**	**0.0000**	**1.8000e-004**	**5.0000e-005**	**0.0000**	**5.0000e-005**	**0.0000**	**0.1580**	**0.1580**	**0.0000**	**0.0000**	**0.1581**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2031	1.4788	1.3188	2.2000e-003		0.0796	0.0796		0.0769	0.0769	0.0000	181.5421	181.5421	0.0337	0.0000	182.3847
Total	**0.2031**	**1.4788**	**1.3188**	**2.2000e-003**		**0.0796**	**0.0796**		**0.0769**	**0.0769**	**0.0000**	**181.5421**	**181.5421**	**0.0337**	**0.0000**	**182.3847**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.0200e-003	0.0960	0.0238	2.3000e-004	5.6700e-003	4.7000e-004	6.1400e-003	1.6400e-003	4.5000e-004	2.0900e-003	0.0000	22.1357	22.1357	1.4500e-003	0.0000	22.1720
Worker	0.0103	7.8700e-003	0.0871	2.5000e-004	0.0252	2.0000e-004	0.0254	6.7000e-003	1.8000e-004	6.8800e-003	0.0000	22.7163	22.7163	6.5000e-004	0.0000	22.7326
Total	**0.0133**	**0.1039**	**0.1109**	**4.8000e-004**	**0.0309**	**6.7000e-004**	**0.0316**	**8.3400e-003**	**6.3000e-004**	**8.9700e-003**	**0.0000**	**44.8520**	**44.8520**	**2.1000e-003**	**0.0000**	**44.9046**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2031	1.4788	1.3188	2.2000e-003		0.0796	0.0796		0.0769	0.0769	0.0000	181.5419	181.5419	0.0337	0.0000	182.3844
Total	**0.2031**	**1.4788**	**1.3188**	**2.2000e-003**		**0.0796**	**0.0796**		**0.0769**	**0.0769**	**0.0000**	**181.5419**	**181.5419**	**0.0337**	**0.0000**	**182.3844**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.0200e-003	0.0960	0.0238	2.3000e-004	5.6700e-003	4.7000e-004	6.1400e-003	1.6400e-003	4.5000e-004	2.0900e-003	0.0000	22.1357	22.1357	1.4500e-003	0.0000	22.1720
Worker	0.0103	7.8700e-003	0.0871	2.5000e-004	0.0252	2.0000e-004	0.0254	6.7000e-003	1.8000e-004	6.8800e-003	0.0000	22.7163	22.7163	6.5000e-004	0.0000	22.7326
Total	**0.0133**	**0.1039**	**0.1109**	**4.8000e-004**	**0.0309**	**6.7000e-004**	**0.0316**	**8.3400e-003**	**6.3000e-004**	**8.9700e-003**	**0.0000**	**44.8520**	**44.8520**	**2.1000e-003**	**0.0000**	**44.9046**

3.6 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	4.2000e-003	0.0423	0.0444	7.0000e-005		2.3500e-003	2.3500e-003		2.1600e-003	2.1600e-003	0.0000	5.8829	5.8829	1.8600e-003	0.0000	5.9295
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**4.2000e-003**	**0.0423**	**0.0444**	**7.0000e-005**		**2.3500e-003**	**2.3500e-003**		**2.1600e-003**	**2.1600e-003**	**0.0000**	**5.8829**	**5.8829**	**1.8600e-003**	**0.0000**	**5.9295**

3.6 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.9000e-004	2.2000e-004	2.4600e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	1.0000e-005	1.9000e-004	0.0000	0.6420	0.6420	2.0000e-005	0.0000	0.6424
Total	**2.9000e-004**	**2.2000e-004**	**2.4600e-003**	**1.0000e-005**	**7.1000e-004**	**1.0000e-005**	**7.2000e-004**	**1.9000e-004**	**1.0000e-005**	**1.9000e-004**	**0.0000**	**0.6420**	**0.6420**	**2.0000e-005**	**0.0000**	**0.6424**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	4.2000e-003	0.0423	0.0444	7.0000e-005		2.3500e-003	2.3500e-003		2.1600e-003	2.1600e-003	0.0000	5.8828	5.8828	1.8600e-003	0.0000	5.9295
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**4.2000e-003**	**0.0423**	**0.0444**	**7.0000e-005**		**2.3500e-003**	**2.3500e-003**		**2.1600e-003**	**2.1600e-003**	**0.0000**	**5.8828**	**5.8828**	**1.8600e-003**	**0.0000**	**5.9295**

3.6 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.9000e-004	2.2000e-004	2.4600e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	1.0000e-005	1.9000e-004	0.0000	0.6420	0.6420	2.0000e-005	0.0000	0.6424
Total	**2.9000e-004**	**2.2000e-004**	**2.4600e-003**	**1.0000e-005**	**7.1000e-004**	**1.0000e-005**	**7.2000e-004**	**1.9000e-004**	**1.0000e-005**	**1.9000e-004**	**0.0000**	**0.6420**	**0.6420**	**2.0000e-005**	**0.0000**	**0.6424**

3.7 Architectural Coating - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2503					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.2100e-003	8.4200e-003	9.1600e-003	1.0000e-005		5.5000e-004	5.5000e-004		5.5000e-004	5.5000e-004	0.0000	1.2766	1.2766	1.0000e-004	0.0000	1.2791
Total	**0.2515**	**8.4200e-003**	**9.1600e-003**	**1.0000e-005**		**5.5000e-004**	**5.5000e-004**		**5.5000e-004**	**5.5000e-004**	**0.0000**	**1.2766**	**1.2766**	**1.0000e-004**	**0.0000**	**1.2791**

3.7 Architectural Coating - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	9.0000e-005	9.5000e-004	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2469	0.2469	1.0000e-005	0.0000	0.2471
Total	**1.1000e-004**	**9.0000e-005**	**9.5000e-004**	**0.0000**	**2.7000e-004**	**0.0000**	**2.8000e-004**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**0.2469**	**0.2469**	**1.0000e-005**	**0.0000**	**0.2471**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2503					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.2100e-003	8.4200e-003	9.1600e-003	1.0000e-005		5.5000e-004	5.5000e-004		5.5000e-004	5.5000e-004	0.0000	1.2766	1.2766	1.0000e-004	0.0000	1.2791
Total	**0.2515**	**8.4200e-003**	**9.1600e-003**	**1.0000e-005**		**5.5000e-004**	**5.5000e-004**		**5.5000e-004**	**5.5000e-004**	**0.0000**	**1.2766**	**1.2766**	**1.0000e-004**	**0.0000**	**1.2791**

3.7 Architectural Coating - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	9.0000e-005	9.5000e-004	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2469	0.2469	1.0000e-005	0.0000	0.2471
Total	**1.1000e-004**	**9.0000e-005**	**9.5000e-004**	**0.0000**	**2.7000e-004**	**0.0000**	**2.8000e-004**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**0.2469**	**0.2469**	**1.0000e-005**	**0.0000**	**0.2471**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2049	4.6350	1.8933	0.0174	0.7664	0.0354	0.8019	0.2168	0.0338	0.2506	0.0000	1,650.3292	1,650.3292	0.0626	0.0000	1,651.8938
Unmitigated	0.2049	4.6350	1.8933	0.0174	0.7664	0.0354	0.8019	0.2168	0.0338	0.2506	0.0000	1,650.3292	1,650.3292	0.0626	0.0000	1,651.8938

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	273.78	273.78	273.78	1,795,149	1,795,149
Total	273.78	273.78	273.78	1,795,149	1,795,149

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	16.60	20.00	6.90	15.00	80.00	5.00	95	2.5	2.5

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.200000	0.000000	0.000000	0.000000	0.200000	0.200000	0.200000	0.200000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	333.8427	333.8427	7.8800e-003	1.6300e-003	334.5260
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	333.8427	333.8427	7.8800e-003	1.6300e-003	334.5260
NaturalGas Mitigated	5.2700e-003	0.0479	0.0403	2.9000e-004		3.6400e-003	3.6400e-003		3.6400e-003	3.6400e-003	0.0000	52.1578	52.1578	1.0000e-003	9.6000e-004	52.4677
NaturalGas Unmitigated	5.2700e-003	0.0479	0.0403	2.9000e-004		3.6400e-003	3.6400e-003		3.6400e-003	3.6400e-003	0.0000	52.1578	52.1578	1.0000e-003	9.6000e-004	52.4677

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	977400	5.2700e-003	0.0479	0.0403	2.9000e-004		3.6400e-003	3.6400e-003		3.6400e-003	3.6400e-003	0.0000	52.1578	52.1578	1.0000e-003	9.6000e-004	52.4677
Total		**5.2700e-003**	**0.0479**	**0.0403**	**2.9000e-004**		**3.6400e-003**	**3.6400e-003**		**3.6400e-003**	**3.6400e-003**	**0.0000**	**52.1578**	**52.1578**	**1.0000e-003**	**9.6000e-004**	**52.4677**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	977400	5.2700e-003	0.0479	0.0403	2.9000e-004		3.6400e-003	3.6400e-003		3.6400e-003	3.6400e-003	0.0000	52.1578	52.1578	1.0000e-003	9.6000e-004	52.4677
Total		**5.2700e-003**	**0.0479**	**0.0403**	**2.9000e-004**		**3.6400e-003**	**3.6400e-003**		**3.6400e-003**	**3.6400e-003**	**0.0000**	**52.1578**	**52.1578**	**1.0000e-003**	**9.6000e-004**	**52.4677**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	599400	333.8427	7.8800e-003	1.6300e-003	334.5260
Total		**333.8427**	**7.8800e-003**	**1.6300e-003**	**334.5260**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	599400	333.8427	7.8800e-003	1.6300e-003	334.5260
Total		**333.8427**	**7.8800e-003**	**1.6300e-003**	**334.5260**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2202	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.3400e-003	1.3400e-003	0.0000	0.0000	1.4300e-003
Unmitigated	0.2202	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.3400e-003	1.3400e-003	0.0000	0.0000	1.4300e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0250					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1951					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	7.0000e-005	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.3400e-003	1.3400e-003	0.0000	0.0000	1.4300e-003
Total	**0.2202**	**1.0000e-005**	**6.9000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.3400e-003**	**1.3400e-003**	**0.0000**	**0.0000**	**1.4300e-003**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0250					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1951					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	7.0000e-005	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.3400e-003	1.3400e-003	0.0000	0.0000	1.4300e-003
Total	**0.2202**	**1.0000e-005**	**6.9000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.3400e-003**	**1.3400e-003**	**0.0000**	**0.0000**	**1.4300e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	94.5235	0.4090	0.0101	107.7446
Unmitigated	94.5235	0.4090	0.0101	107.7446

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	12.4875 / 0	94.5235	0.4090	0.0101	107.7446
Total		**94.5235**	**0.4090**	**0.0101**	**107.7446**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	12.4875 / 0	94.5235	0.4090	0.0101	107.7446
Total		**94.5235**	**0.4090**	**0.0101**	**107.7446**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	13.5923	0.8033	0.0000	33.6743
Unmitigated	13.5923	0.8033	0.0000	33.6743

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	66.96	13.5923	0.8033	0.0000	33.6743
Total		**13.5923**	**0.8033**	**0.0000**	**33.6743**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	66.96	13.5923	0.8033	0.0000	33.6743
Total		**13.5923**	**0.8033**	**0.0000**	**33.6743**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	3	8.00	312	203	0.95	Diesel
Forklifts	1	11.00	312	89	0.20	Diesel
Skid Steer Loaders	1	11.00	312	65	0.95	Diesel
Excavators	2	11.00	312	158	0.38	Diesel

UnMitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Excavators	0.1051	1.0350	1.4019	2.2200e-003		0.0501	0.0501		0.0461	0.0461	0.0000	194.6372	194.6372	0.0630	0.0000	196.2110
Forklifts	0.0309	0.2783	0.2532	3.3000e-004		0.0207	0.0207		0.0191	0.0191	0.0000	28.8055	28.8055	9.3200e-003	0.0000	29.0384
Rubber Tired Loaders	0.4620	5.4458	2.0198	7.7200e-003		0.1808	0.1808		0.1663	0.1663	0.0000	678.0049	678.0049	0.2193	0.0000	683.4870
Skid Steer Loaders	0.0440	0.5851	0.7656	1.1400e-003		0.0253	0.0253		0.0233	0.0233	0.0000	100.0095	100.0095	0.0324	0.0000	100.8181
Total	**0.6420**	**7.3443**	**4.4404**	**0.0114**		**0.2770**	**0.2770**		**0.2548**	**0.2548**	**0.0000**	**1,001.4571**	**1,001.4571**	**0.3239**	**0.0000**	**1,009.5544**

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Direct Disposal Transfer Processing Facility

South Coast AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	54.00	1000sqft	1.24	54,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	12			**Operational Year**	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Summer

Project Characteristics - Consistent with the FIS/MND's model.

Land Use - Consistent with the FIS/MND's model.

Construction Phase - Consistent with the FIS/MND's model. No construction.

Off-road Equipment - Consistent with the FIS/MND's model. No construction.

Grading -

Trips and VMT - Consistent with the FIS/MND's model. No construction.

Vehicle Trips - Consistent with the FIS/MND's model. See SWAPE comment regarding Sunday trip rate.

Fleet Mix - Consistent with the FIS/MND's model.

Energy Use -

Operational Off-Road Equipment - Consistent with the Equipment Emissions Calculations (FIS/MND, pp. 20-22). Load factor consistent with the FIS/MND's model. See SWAPE comment regarding horsepower values.

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.20
tblFleetMix	LDA	0.55	0.20
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LHD1	0.02	0.20
tblFleetMix	LHD2	5.8620e-003	0.20
tblFleetMix	MCY	4.7770e-003	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	9.5600e-004	0.00
tblFleetMix	MHD	0.02	0.20
tblFleetMix	OBUS	2.0370e-003	0.00
tblFleetMix	SBUS	7.0500e-004	0.00
tblFleetMix	UBUS	1.9440e-003	0.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00

tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.36	0.95
tblOperationalOffRoadEquipment	OperLoadFactor	0.37	0.95
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	3.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	1.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	1.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	2.00
tblVehicleTrips	CC_TL	8.40	20.00
tblVehicleTrips	CC_TTP	28.00	80.00
tblVehicleTrips	CNW_TTP	13.00	5.00
tblVehicleTrips	CW_TTP	59.00	15.00
tblVehicleTrips	DV_TP	5.00	2.50
tblVehicleTrips	PB_TP	3.00	2.50
tblVehicleTrips	PR_TP	92.00	95.00
tblVehicleTrips	ST_TR	1.50	5.07
tblVehicleTrips	SU_TR	1.50	5.07
tblVehicleTrips	WD_TR	1.50	5.07

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3587	22.7194	15.4785	0.0256	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961
2020	50.3228	20.9858	15.1887	0.0270	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,511.3791	2,511.3791	0.6012	0.0000	2,521.2432
Maximum	**50.3228**	**22.7194**	**15.4785**	**0.0270**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,514.2483**	**2,514.2483**	**0.6059**	**0.0000**	**2,529.3961**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3587	22.7194	15.4785	0.0256	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961
2020	50.3228	20.9858	15.1887	0.0270	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,511.3791	2,511.3791	0.6012	0.0000	2,521.2432
Maximum	**50.3228**	**22.7194**	**15.4785**	**0.0270**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,514.2483**	**2,514.2483**	**0.6059**	**0.0000**	**2,529.3961**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Offroad	4.1153	47.0785	28.4639	0.0731		1.7755	1.7755		1.6335	1.6335		7,076.3942	7,076.3942	2.2887		7,133.6104
Total	**6.4775**	**71.8534**	**39.1358**	**0.1708**	**4.2804**	**1.9900**	**6.2704**	**1.2081**	**1.8393**	**3.0473**		**17,468.5614**	**17,468.5614**	**2.6697**	**5.7800e-003**	**17,537.0249**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Offroad	4.1153	47.0785	28.4639	0.0731		1.7755	1.7755		1.6335	1.6335		7,076.3942	7,076.3942	2.2887		7,133.6104
Total	**6.4775**	**71.8534**	**39.1358**	**0.1708**	**4.2804**	**1.9900**	**6.2704**	**1.2081**	**1.8393**	**3.0473**		**17,468.5614**	**17,468.5614**	**2.6697**	**5.7800e-003**	**17,537.0249**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Summer

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	12/31/2019	1/27/2020	5	20	
2	Site Preparation	Site Preparation	1/28/2020	1/29/2020	5	2	
3	Grading	Grading	1/30/2020	2/4/2020	5	4	
4	Building Construction	Building Construction	2/5/2020	11/10/2020	5	200	
5	Paving	Paving	11/11/2020	11/24/2020	5	10	
6	Architectural Coating	Architectural Coating	11/25/2020	12/8/2020	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 81,000; Non-Residential Outdoor: 27,000; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	23.00	9.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**		**2,360.7198**	**2,360.7198**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486
Total	**0.0637**	**0.0443**	**0.5841**	**1.5400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**153.5286**	**153.5286**	**4.8000e-003**		**153.6486**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**	**0.0000**	**2,360.7197**	**2,360.7197**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486
Total	**0.0637**	**0.0443**	**0.5841**	**1.5400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**153.5286**	**153.5286**	**4.8000e-003**		**153.6486**

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**		**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**	**0.0000**	**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**		**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**	**0.0000**	**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**		**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**	**0.0000**	**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**		**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0296	0.9444	0.2249	2.3200e-003	0.0576	4.6800e-003	0.0623	0.0166	4.4800e-003	0.0211		247.0036	247.0036	0.0155		247.3913
Worker	0.1041	0.0700	0.9403	2.6400e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		263.2160	263.2160	7.5700e-003		263.4052
Total	**0.1336**	**1.0144**	**1.1652**	**4.9600e-003**	**0.3147**	**6.6300e-003**	**0.3213**	**0.0848**	**6.2800e-003**	**0.0910**		**510.2196**	**510.2196**	**0.0231**		**510.7965**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**	**0.0000**	**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0296	0.9444	0.2249	2.3200e-003	0.0576	4.6800e-003	0.0623	0.0166	4.4800e-003	0.0211		247.0036	247.0036	0.0155		247.3913
Worker	0.1041	0.0700	0.9403	2.6400e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		263.2160	263.2160	7.5700e-003		263.4052
Total	**0.1336**	**1.0144**	**1.1652**	**4.9600e-003**	**0.3147**	**6.6300e-003**	**0.3213**	**0.0848**	**6.2800e-003**	**0.0910**		**510.2196**	**510.2196**	**0.0231**		**510.7965**

3.6 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**		**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**	**0.0000**	**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

3.7 Architectural Coating - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**		**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620
Total	**0.0226**	**0.0152**	**0.2044**	**5.7000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**57.2209**	**57.2209**	**1.6500e-003**		**57.2620**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**	**0.0000**	**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620
Total	**0.0226**	**0.0152**	**0.2044**	**5.7000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**57.2209**	**57.2209**	**1.6500e-003**		**57.2620**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Unmitigated	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	273.78	273.78	273.78	1,795,149	1,795,149
Total	273.78	273.78	273.78	1,795,149	1,795,149

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	16.60	20.00	6.90	15.00	80.00	5.00	95	2.5	2.5

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.200000	0.000000	0.000000	0.000000	0.200000	0.200000	0.200000	0.200000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
NaturalGas Unmitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2677.81	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2.67781	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Unmitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	3	8.00	312	203	0.95	Diesel
Forklifts	1	11.00	312	89	0.20	Diesel
Skid Steer Loaders	1	11.00	312	65	0.95	Diesel
Excavators	2	11.00	312	158	0.38	Diesel

UnMitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	lb/day										lb/day					
Excavators	0.6737	6.6347	8.9865	0.0142		0.3214	0.3214		0.2957	0.2957		1,375.3257	1,375.3257	0.4448		1,386.4459
Forklifts	0.1980	1.7841	1.6229	2.1000e-003		0.1329	0.1329		0.1223	0.1223		203.5424	203.5424	0.0658		205.1881
Rubber Tired Loaders	2.9615	34.9091	12.9471	0.0495		1.1589	1.1589		1.0662	1.0662		4,790.8494	4,790.8494	1.5495		4,829.5858
Skid Steer Loaders	0.2821	3.7506	4.9074	7.3000e-003		0.1624	0.1624		0.1494	0.1494		706.6768	706.6768	0.2286		712.3906
Total	**4.1153**	**47.0785**	**28.4639**	**0.0731**		**1.7755**	**1.7755**		**1.6335**	**1.6335**		**7,076.3942**	**7,076.3942**	**2.2887**		**7,133.6104**

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Direct Disposal Transfer Processing Facility

South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	54.00	1000sqft	1.24	54,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	12			**Operational Year**	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Winter

Project Characteristics - Consistent with the FIS/MND's model.

Land Use - Consistent with the FIS/MND's model.

Construction Phase - Consistent with the FIS/MND's model. No construction.

Off-road Equipment - Consistent with the FIS/MND's model. No construction.

Grading -

Trips and VMT - Consistent with the FIS/MND's model. No construction.

Vehicle Trips - Consistent with the FIS/MND's model. See SWAPE comment regarding Sunday trip rate.

Fleet Mix - Consistent with the FIS/MND's model.

Energy Use -

Operational Off-Road Equipment - Consistent with the Equipment Emissions Calculations (FIS/MND, pp. 20-22). Load factor consistent with the FIS/MND's model. See SWAPE comment regarding horsepower values.

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.20
tblFleetMix	LDA	0.55	0.20
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LHD1	0.02	0.20
tblFleetMix	LHD2	5.8620e-003	0.20
tblFleetMix	MCY	4.7770e-003	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	9.5600e-004	0.00
tblFleetMix	MHD	0.02	0.20
tblFleetMix	OBUS	2.0370e-003	0.00
tblFleetMix	SBUS	7.0500e-004	0.00
tblFleetMix	UBUS	1.9440e-003	0.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00

tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	312.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	11.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.36	0.95
tblOperationalOffRoadEquipment	OperLoadFactor	0.37	0.95
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	3.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	1.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	1.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	2.00
tblVehicleTrips	CC_TL	8.40	20.00
tblVehicleTrips	CC_TTP	28.00	80.00
tblVehicleTrips	CNW_TTP	13.00	5.00
tblVehicleTrips	CW_TTP	59.00	15.00
tblVehicleTrips	DV_TP	5.00	2.50
tblVehicleTrips	PB_TP	3.00	2.50
tblVehicleTrips	PR_TP	92.00	95.00
tblVehicleTrips	ST_TR	1.50	5.07
tblVehicleTrips	SU_TR	1.50	5.07
tblVehicleTrips	WD_TR	1.50	5.07

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3643	22.7236	15.4213	0.0255	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649
2020	50.3249	20.9896	15.1358	0.0268	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,487.2050	2,487.2050	0.6009	0.0000	2,497.0851
Maximum	**50.3249**	**22.7236**	**15.4213**	**0.0268**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,504.3250**	**2,504.3250**	**0.6056**	**0.0000**	**2,519.4649**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3643	22.7236	15.4213	0.0255	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649
2020	50.3249	20.9896	15.1358	0.0268	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,487.2050	2,487.2050	0.6009	0.0000	2,497.0851
Maximum	**50.3249**	**22.7236**	**15.4213**	**0.0268**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,504.3250**	**2,504.3250**	**0.6056**	**0.0000**	**2,519.4649**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Offroad	4.1153	47.0785	28.4639	0.0731		1.7755	1.7755		1.6335	1.6335		7,076.3942	7,076.3942	2.2887		7,133.6104
Total	**6.4919**	**72.4153**	**39.1970**	**0.1695**	**4.2804**	**1.9909**	**6.2712**	**1.2081**	**1.8401**	**3.0481**		**17,337.6032**	**17,337.6032**	**2.6815**	**5.7800e-003**	**17,406.3618**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Offroad	4.1153	47.0785	28.4639	0.0731		1.7755	1.7755		1.6335	1.6335		7,076.3942	7,076.3942	2.2887		7,133.6104
Total	**6.4919**	**72.4153**	**39.1970**	**0.1695**	**4.2804**	**1.9909**	**6.2712**	**1.2081**	**1.8401**	**3.0481**		**17,337.6032**	**17,337.6032**	**2.6815**	**5.7800e-003**	**17,406.3618**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Winter

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	12/31/2019	1/27/2020	5	20	
2	Site Preparation	Site Preparation	1/28/2020	1/29/2020	5	2	
3	Grading	Grading	1/30/2020	2/4/2020	5	4	
4	Building Construction	Building Construction	2/5/2020	11/10/2020	5	200	
5	Paving	Paving	11/11/2020	11/24/2020	5	10	
6	Architectural Coating	Architectural Coating	11/25/2020	12/8/2020	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 81,000; Non-Residential Outdoor: 27,000; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Direct Disposal Transfer Processing Facility - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	23.00	9.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**		**2,360.7198**	**2,360.7198**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174
Total	**0.0693**	**0.0485**	**0.5270**	**1.4400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**143.6053**	**143.6053**	**4.4900e-003**		**143.7174**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**	**0.0000**	**2,360.7197**	**2,360.7197**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174
Total	**0.0693**	**0.0485**	**0.5270**	**1.4400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**143.6053**	**143.6053**	**4.4900e-003**		**143.7174**

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**		**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**	**0.0000**	**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**		**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**	**0.0000**	**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**		**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**	**0.0000**	**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**		**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0310	0.9434	0.2507	2.2500e-003	0.0576	4.7500e-003	0.0624	0.0166	4.5400e-003	0.0211		239.8615	239.8615	0.0167		240.2779
Worker	0.1135	0.0766	0.8466	2.4700e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		246.1839	246.1839	7.0600e-003		246.3605
Total	**0.1445**	**1.0200**	**1.0973**	**4.7200e-003**	**0.3147**	**6.7000e-003**	**0.3214**	**0.0848**	**6.3400e-003**	**0.0911**		**486.0455**	**486.0455**	**0.0237**		**486.6384**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**	**0.0000**	**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0310	0.9434	0.2507	2.2500e-003	0.0576	4.7500e-003	0.0624	0.0166	4.5400e-003	0.0211		239.8615	239.8615	0.0167		240.2779
Worker	0.1135	0.0766	0.8466	2.4700e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		246.1839	246.1839	7.0600e-003		246.3605
Total	**0.1445**	**1.0200**	**1.0973**	**4.7200e-003**	**0.3147**	**6.7000e-003**	**0.3214**	**0.0848**	**6.3400e-003**	**0.0911**		**486.0455**	**486.0455**	**0.0237**		**486.6384**

3.6 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**		**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**	**0.0000**	**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

3.7 Architectural Coating - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**		**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566
Total	**0.0247**	**0.0167**	**0.1840**	**5.4000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**53.5183**	**53.5183**	**1.5300e-003**		**53.5566**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**	**0.0000**	**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566
Total	**0.0247**	**0.0167**	**0.1840**	**5.4000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**53.5183**	**53.5183**	**1.5300e-003**		**53.5566**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Unmitigated	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	273.78	273.78	273.78	1,795,149	1,795,149
Total	273.78	273.78	273.78	1,795,149	1,795,149

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	16.60	20.00	6.90	15.00	80.00	5.00	95	2.5	2.5

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.200000	0.000000	0.000000	0.000000	0.200000	0.200000	0.200000	0.200000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
NaturalGas Unmitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2677.81	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2.67781	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Unmitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	3	8.00	312	203	0.95	Diesel
Forklifts	1	11.00	312	89	0.20	Diesel
Skid Steer Loaders	1	11.00	312	65	0.95	Diesel
Excavators	2	11.00	312	158	0.38	Diesel

UnMitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	lb/day										lb/day					
Excavators	0.6737	6.6347	8.9865	0.0142		0.3214	0.3214		0.2957	0.2957		1,375.3257	1,375.3257	0.4448		1,386.4459
Forklifts	0.1980	1.7841	1.6229	2.1000e-003		0.1329	0.1329		0.1223	0.1223		203.5424	203.5424	0.0658		205.1881
Rubber Tired Loaders	2.9615	34.9091	12.9471	0.0495		1.1589	1.1589		1.0662	1.0662		4,790.8494	4,790.8494	1.5495		4,829.5858
Skid Steer Loaders	0.2821	3.7506	4.9074	7.3000e-003		0.1624	0.1624		0.1494	0.1494		706.6768	706.6768	0.2286		712.3906
Total	**4.1153**	**47.0785**	**28.4639**	**0.0731**		**1.7755**	**1.7755**		**1.6335**	**1.6335**		**7,076.3942**	**7,076.3942**	**2.2887**		**7,133.6104**

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Start date and time 11/16/20 15:40:20

AERSCREEN 16216

Direct Disposal Transfer Processing Facility

Direct Disposal Transfer Processing Facility

---------- DATA ENTRY VALIDATION ----------

	METRIC	ENGLISH
** AREADATA **	---	---
Emission Rate:	0.909E-02 g/s	0.721E-01 lb/hr
Area Height:	3.00 meters	9.84 feet
Area Source Length:	88.00 meters	288.71 feet
Area Source Width:	57.00 meters	187.01 feet
Vertical Dimension:	1.50 meters	4.92 feet
Model Mode:	URBAN	
Population:	3990000	
Dist to Ambient Air:	1.0 meters	3. feet

** BUILDING DATA **

No Building Downwash Parameters

** TERRAIN DATA **

No Terrain Elevations

Source Base Elevation: 0.0 meters 0.0 feet

Probe distance: 5000. meters 16404. feet

No flagpole receptors

No discrete receptors used

** FUMIGATION DATA **

No fumigation requested

** METEOROLOGY DATA **

Min/Max Temperature: 250.0 / 310.0 K -9.7 / 98.3 Deg F

Minimum Wind Speed: 0.5 m/s

Anemometer Height: 10.000 meters

Dominant Surface Profile: Urban

Dominant Climate Type: Average Moisture

Surface friction velocity (u*): not adjusted

DEBUG OPTION ON

AERSCREEN output file:

2020.11.16_DirectDisposal_Operational.out

*** AERSCREEN Run is Ready to Begin

No terrain used, AERMAP will not be run

****

SURFACE CHARACTERISTICS & MAKEMET

Obtaining surface characteristics...

Using AERMET seasonal surface characteristics for Urban with Average Moisture

Season	Albedo	Bo	zo
Winter	0.35	1.50	1.000
Spring	0.14	1.00	1.000
Summer	0.16	2.00	1.000
Autumn	0.18	2.00	1.000

Creating met files aerscreen_01_01.sfc & aerscreen_01_01.pfl

Creating met files aerscreen_02_01.sfc & aerscreen_02_01.pfl

Creating met files aerscreen_03_01.sfc & aerscreen_03_01.pfl

Creating met files aerscreen_04_01.sfc & aerscreen_04_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR started 11/16/20 15:42:03

****

Running AERMOD

Processing Winter

Processing surface roughness sector 1

```
**************************************************

Processing wind flow sector   1

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector   0

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************

Processing wind flow sector   2

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector   5

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************

Processing wind flow sector   3

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  10

    ********   WARNING MESSAGES   ********

               ***  NONE  ***
```

```
**************************************************

Processing wind flow sector   4

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  15

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************

Processing wind flow sector   5

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  20

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************

Processing wind flow sector   6

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  25

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************
```

```
Processing wind flow sector   7

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  30

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   8

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  35

    ********   WARNING MESSAGES   ********
               ***  NONE  ***
 ****************************************

  Running AERMOD
 Processing Spring

Processing surface roughness sector  1

**************************************************
Processing wind flow sector   1

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector   0
```

```
    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   2


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector   5


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   3


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  10


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   4


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  15
```

```
    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   5


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  20


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   6


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  25


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   7


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  30


    ********   WARNING MESSAGES   ********
```

```
               ***  NONE  ***

**************************************************
Processing wind flow sector   8

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  35

    ********   WARNING MESSAGES   ********
               ***  NONE  ***
 ******************************************

  Running AERMOD
 Processing Summer

Processing surface roughness sector  1

**************************************************
Processing wind flow sector   1

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector   0

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
```

```
Processing wind flow sector   2

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector   5

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   3

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  10

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   4

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  15

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   5
```

```
 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  20

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************
Processing wind flow sector   6

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  25

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************
Processing wind flow sector   7

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  30

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************
Processing wind flow sector   8
```

```
 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  35

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

 ******************************************

  Running AERMOD

 Processing Autumn

Processing surface roughness sector  1

**************************************************

Processing wind flow sector   1

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector   0

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************

Processing wind flow sector   2

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector   5

    ********   WARNING MESSAGES   ********
```

```
               ***  NONE  ***

**************************************************
Processing wind flow sector   3

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  10

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   4

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  15

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   5

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  20

    ********   WARNING MESSAGES   ********
               ***  NONE  ***
```

```
**************************************************
Processing wind flow sector   6

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  25

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   7

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  30

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   8

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  35

    ********   WARNING MESSAGES   ********
               ***  NONE  ***
```

FLOWSECTOR   ended 11/16/20 15:42:15

REFINE   started 11/16/20 15:42:15

 AERMOD Finishes Successfully for REFINE stage 3 Winter sector   0

    ********   WARNING MESSAGES   ********

                *** NONE ***

REFINE   ended 11/16/20 15:42:16

 ****

 AERSCREEN Finished Successfully

 With no errors or warnings

 Check log file for details

 ****

 Ending date and time 11/16/20 15:42:18

```
 Concentration     Distance Elevation  Diag  Season/Month   Zo sector       Date
 H0     U*     W*  DT/DZ ZICNV ZIMCH  M-O LEN    Z0  BOWEN ALBEDO  REF WS     HT
REF TA     HT
   0.27200E+02         1.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.32950E+02        25.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
*  0.35476E+02        46.00      0.00  30.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.35317E+02        50.00      0.00  30.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.17517E+02        75.00      0.00  25.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11295E+02       100.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.81900E+01       125.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.63204E+01       150.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.50908E+01       175.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.42221E+01       200.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.35851E+01       225.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.30964E+01       250.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.27139E+01       275.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.24059E+01       300.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.21536E+01       325.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.19444E+01       350.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
```

```
310.0    2.0
   0.17683E+01       375.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.16180E+01       400.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.14885E+01       425.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.13755E+01       450.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.12769E+01       475.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11902E+01       500.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11129E+01       525.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10440E+01       550.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.98231E+00       575.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.92667E+00       600.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.87637E+00       625.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.83066E+00       650.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.78894E+00       675.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.75058E+00       700.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.71534E+00       725.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.68270E+00       750.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.65256E+00       775.00      0.00   0.0        Winter       0-360   10011001
```

-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.62466E+00   800.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.59877E+00   825.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.57468E+00   850.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.55224E+00   875.00   0.00 10.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.53127E+00   900.00   0.00 10.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.51167E+00   925.00   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.49327E+00   950.00   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.47601E+00   975.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.45974E+00   1000.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.44614E+00   1025.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.43161E+00   1050.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.41788E+00   1075.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.40490E+00   1100.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.39259E+00   1125.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.38092E+00   1150.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.36984E+00   1175.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0

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   0.35930E+00      1200.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.34927E+00      1225.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.33972E+00      1250.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.33062E+00      1275.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.32192E+00      1300.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.31362E+00      1325.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.30568E+00      1350.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.29807E+00      1375.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.29080E+00      1400.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.28382E+00      1425.00      0.00  15.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.27713E+00      1450.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.27071E+00      1475.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.26454E+00      1500.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.25861E+00      1525.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.25291E+00      1550.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.24742E+00      1574.99      0.00  25.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.24213E+00      1600.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
```

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310.0    2.0
   0.23704E+00      1625.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.23213E+00      1650.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.22739E+00      1675.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.22282E+00      1700.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.21841E+00      1725.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.21414E+00      1750.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.21002E+00      1775.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.20603E+00      1800.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.20217E+00      1825.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.19844E+00      1850.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.19482E+00      1875.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.19131E+00      1899.99      0.00  25.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.18792E+00      1924.99      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.18462E+00      1950.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.18143E+00      1975.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.17833E+00      2000.00      0.00  35.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.17532E+00      2025.00      0.00   0.0        Winter       0-360   10011001
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-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.17240E+00   2050.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.16956E+00   2075.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.16680E+00   2100.00   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.16412E+00   2124.99   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.16151E+00   2150.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.15897E+00   2175.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.15650E+00   2200.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.15410E+00   2225.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.15176E+00   2250.00   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.14948E+00   2275.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.14726E+00   2300.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.14510E+00   2325.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.14299E+00   2350.00   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.14094E+00   2375.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.13893E+00   2400.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.13698E+00   2425.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0

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   0.13507E+00      2449.99      0.00  25.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.13320E+00      2475.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.13138E+00      2500.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.12960E+00      2525.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.12787E+00      2550.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.12617E+00      2575.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.12451E+00      2600.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.12289E+00      2625.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.12131E+00      2650.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11976E+00      2675.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11824E+00      2700.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11676E+00      2725.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11531E+00      2750.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11389E+00      2775.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11250E+00      2800.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.11114E+00      2825.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10980E+00      2850.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
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310.0    2.0
   0.10850E+00      2875.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10722E+00      2900.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10597E+00      2925.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10474E+00      2950.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10354E+00      2975.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10236E+00      3000.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10120E+00      3025.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.10007E+00      3050.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.98955E-01      3074.99      0.00  20.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.97864E-01      3100.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.96794E-01      3125.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.95744E-01      3150.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.94713E-01      3174.99      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.93702E-01      3199.99      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.92709E-01      3225.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.91734E-01      3249.99      0.00  35.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.90777E-01      3275.00      0.00  35.0        Winter       0-360   10011001
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-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.89837E-01   3300.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.88914E-01   3325.00   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.88007E-01   3350.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.87115E-01   3375.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.86240E-01   3400.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.85380E-01   3425.00   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.84534E-01   3450.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.83703E-01   3475.00   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.82885E-01   3500.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.82082E-01   3525.00   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.81292E-01   3550.00   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.80515E-01   3575.00   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.79751E-01   3600.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.78999E-01   3625.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.78259E-01   3650.00   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.77532E-01   3674.99   0.00 35.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0

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   0.76816E-01      3700.00      0.00  20.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.76111E-01      3724.99      0.00  20.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.75417E-01      3750.00      0.00  25.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.74735E-01      3775.00      0.00  25.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.74062E-01      3800.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.73401E-01      3825.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.72750E-01      3849.99      0.00  15.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.72108E-01      3875.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.71476E-01      3900.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.70854E-01      3925.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.70241E-01      3950.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.69637E-01      3975.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.69042E-01      4000.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.68456E-01      4025.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.67878E-01      4050.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.67309E-01      4074.99      0.00  35.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.66748E-01      4100.00      0.00  25.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
```

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310.0    2.0
   0.66196E-01      4125.00      0.00  30.0        Winter       0-360   10011001
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310.0    2.0
   0.65650E-01      4150.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.65113E-01      4175.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.64583E-01      4200.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.64061E-01      4225.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.63546E-01      4250.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.63038E-01      4275.00      0.00   0.0        Winter       0-360   10011001
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310.0    2.0
   0.62537E-01      4300.00      0.00  10.0        Winter       0-360   10011001
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310.0    2.0
   0.62043E-01      4325.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.61556E-01      4350.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.61075E-01      4375.00      0.00   5.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.60601E-01      4400.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.60133E-01      4425.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.59671E-01      4449.99      0.00  10.0        Winter       0-360   10011001
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310.0    2.0
   0.59215E-01      4475.00      0.00  10.0        Winter       0-360   10011001
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310.0    2.0
   0.58766E-01      4500.00      0.00  10.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
   0.58322E-01      4525.00      0.00  10.0        Winter       0-360   10011001
```

-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
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-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.57452E-01   4575.00   0.00 20.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.57025E-01   4600.00   0.00   0.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.56603E-01   4625.00   0.00   0.0   Winter   0-360   10011001
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310.0   2.0
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310.0   2.0
   0.55777E-01   4675.00   0.00   0.0   Winter   0-360   10011001
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310.0   2.0
   0.55371E-01   4700.00   0.00   0.0   Winter   0-360   10011001
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310.0   2.0
   0.54971E-01   4725.00   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.54576E-01   4750.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.54185E-01   4775.00   0.00   0.0   Winter   0-360   10011001
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310.0   2.0
   0.53799E-01   4800.00   0.00   5.0   Winter   0-360   10011001
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310.0   2.0
   0.53418E-01   4825.00   0.00 15.0   Winter   0-360   10011001
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310.0   2.0
   0.53042E-01   4850.00   0.00   5.0   Winter   0-360   10011001
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310.0   2.0
   0.52670E-01   4875.00   0.00 25.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.52303E-01   4900.00   0.00   5.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0
   0.51940E-01   4924.99   0.00 15.0   Winter   0-360   10011001
-1.30 0.043 -9.000 0.020 -999.   21.   6.0 1.000   1.50   0.35   0.50   10.0
310.0   2.0

```
   0.51581E-01      4950.00      0.00   5.0        Winter       0-360   10011001
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310.0    2.0
   0.51227E-01      4975.00      0.00   0.0        Winter       0-360   10011001
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310.0    2.0
   0.50877E-01      5000.00      0.00   0.0        Winter       0-360   10011001
-1.30  0.043 -9.000  0.020 -999.   21.      6.0 1.000   1.50   0.35    0.50   10.0
310.0    2.0
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APPENDIX E

RESPONSES TO BLUM COLLINS LETTER DATED OCTOBER 19, 2020

Comment BC2-1 – The Final MND changes the Draft MND's Figure 2 to reflect that 3719 Noakes Street will no longer be a "vehicle staging area" and that no solid waste processing or storage will occur there. It is apparent that 3719 Noakes Street will still be used for "Roll-off Container Storage" and employee and truck parking. Therefore, the MND should have evaluated the impacts to the 3719 Noakes Street property and to residents within 1,000 feet of the 3719 Noakes Street property. Its failure to do this is contrary to CEQA and the California Air Resources Board's Land Use and Air Quality Handbook ("Handbook") which we previously forwarded to you. Contrary to the Response to Comments' statement, CARB's Handbook was *completely* developed to assist local land use agencies in conducting CEQA review, and we are attaching two of many, many examples we have in which the South Coast Air Quality Management District ("SCAQMD") has provided CEQA comments based on CARB's Handbook. *See* Exhibits A and B (page 2 in both Exhibits).

Response BC2-1 – 3719 Noakes will not be permitted or used for solid waste storage or recyclable material sorting. The decision to remove it from the project scope was based on the applicant's desire to minimize the facility's footprint and potential impacts on the surrounding community. The 3719 Noakes Street site is currently permitted for parking cars and roll-off trucks and will continue to be used for parking. The Direct Disposal facility will be inspected monthly by the LEA and any solid waste or recycling material sorting operations on the 3719 Noakes Street property would violate the terms of the solid waste facility permit and could result in revocation of the permit.

3719 Noakes Street is currently permitted for parking and the proposed project will not intensify that use. The use of the land is regulated by the Los Angeles Department of Building and Safety and a Certificate of Occupancy (see **Appendix I**) was issued to allow vehicle parking on the site. The Local Enforcement Agency regulates parking of solid waste collection vehicles and 3719 Noakes Street is also currently permitted for that use as well. There is no change in the use of 3719 Noakes Street under the proposed project. Since there will be no solid waste processing or queuing on the 3719 Noakes Street property, and it is not contiguous with 3720 Noakes Street, it was not included in the proposed Solid Waste Facility Permit application and therefore is not included within the scope of the project reviewed in the Draft or Final Mitigated Negative Declaration (MND).

The air quality analysis contained in the Final IS/MND was reviewed by Yorke Engineering, LLC (**Appendix F**) and concluded that air quality impacts would not exceed any SCAQMD thresholds and that there would not be any significant air quality impacts due to the proposed project. Yorke Engineering also found that the NOx emissions in the Final IS/MND were conservatively overstated by approximately 3.3 pounds per day. As recalculated by Yorke Engineering, LLC project related NOx emissions would be 51.2 pounds per day.

Comment BC2-2 – The Final MND changes the Draft MND at page 9 to reflect that Direct Disposal has operated a medium volume *CDI* facility, *not* a "solid waste processing and transfer" material recovery facility. CDI is defined as "Construction, Demolition and Inert" materials. This is relevant because the introduction of solid (municipal) waste into the waste stream at the facility is likely to pose risks to neighbors.

Response BC2-2 – The potential impacts of solid waste transfer and processing are addressed in the Draft and Final IS/MND. The project description includes a maximum 100 ton per day limit on the amount of solid waste that can be processed and transferred at the Direct Disposal Facility and the solid waste facility permit would ultimately include that limitation as well. It should be noted incoming material classified as MSW is generated from garage cleanouts and loads from "Got-Junk" types of businesses or may be low in recyclable content. This material does not fit in the definition of construction, demolition and inert material and can only be accepted with a full solid waste facility permit. MSW will not be processed over the sort line, and any material classified as MSW and will be temporarily stored inside a building and transferred to a permitted landfill. It must be further noted that Title 14 of the California Code of Regulations sets the State Minimum Standards for handling all material processed at the Direct Disposal facility and these regulations are enforced by the LEA. Any MSW received at the facility will be processed on a first-in, first-out basis within 48 hours or being received.

Comment BC2-3 – Section 3.3, Air Quality, was modified to reflect that the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation was significant without the incorporation of mitigation, although the agency continues to take the position that impacts will be less than significant based now on a CalEEMod analysis. See our comments below regarding the merits of that analysis.

Response BC2-3 – The air quality analysis contained in the Final IS/MND was reviewed by Yorke Engineering, LLC (**Appendix F**) and it concluded that air quality impacts would not exceed any SCAQMD thresholds and that there would not be any significant air quality impacts due to the proposed project, Yorke Engineering also found that the NOx emissions from the Final IS/MND were overstated by approximately 3.3 pounds per day.

Comment BC2-4 – The Final MND is also revised to acknowledge that the Project will increase the number of vehicles accessing the site and the running times for off-road diesel powered equipment used at the facility. We are uncertain about the adequacy of the off-road diesel equipment CalEEMod analysis because we have not attempted to independently verify that analysis, but as we note below, it is clear that emissions will exceed the SCAQMD regional threshold for NO_x regardless. We also note that the LEA did ***not*** require the preparation of an HRA (Health Risk Assessment) relating to the off-road diesel equipment and truck use related to the Project. This is inadequate given the Project's location close to a number of sensitive residential receptors.

Response BC2-4 – The site is over 1,000 feet from residences and the nearest sensitive receptors as shown in **Figure 7.** As shown in **Table 2** on page 39, a total of approximately 109 additional truck trips are anticipated from the proposed project as follows: 58 roll-off trucks which are fueled by both diesel and Compressed Natural Gas (CNG), 15 transfer trucks which are all diesel fueled and 36 self-haul vehicles which are a mix of diesel and gas fueled trucks. The main source of toxic air contaminants (TACs) is from heavy duty diesel (HD) trucks. HD trucks release diesel particulate matter (DPM) that is regulated as a carcinogen. DPM is not regulated for any short-term (acute) non-cancer health effects.

The project is not a warehouse distribution facility, or a truck stop and would not generate over 100 new diesel truck trips per day given that a large percentage of the vehicles using the facility are CNG and gas fueled. While the project does not meet the SCAQMD criteria for a HRA, a screening level health risk assessment (HRA) has been prepared for the project and is included in **Appendix G**. The HRA conservatively estimated 109 heavy duty (HD) diesel fueled trucks per day using the facility. The results of the screening level HRA indicate that the maximum cancer risk score would be 0.46 within 100 meters (328 feet) of the project site and that the cancer risk score at the nearest homes located 1,075 feet to the North is estimated to be 0.02. A cancer risk score below 1 indicates a low level of public risk. These results indicate that exposure to toxic emissions from the Facility would not lead to significant public health risks.

Comment BC2-5 – The Final MND alters the Draft by acknowledging that the Project has the potential to lead to objectionable odors.

Response BC2-5 – The Draft and Final IS/MND included mitigation measures to reduce potential odor impacts to less than significant levels as follows:

AQ7. All incoming loads are checked for excessive odor. Loads may be rejected at the scalehouse or, if accepted, transferred out as soon as possible.

AQ8. 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.

AQ9. A misting system over tipping and transfer/load-out areas, as needed, will be used to control potential odors as well as dust emissions.

AQ10. All MSW received at the facility will be transferred out within 48 hours and within 24 hours if possible. Material will be processed on a first in, first out, basis.

AQ11. 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 for odors on site.

AQ12. The receiving/transfer area, where residue from waste transfer, recycling or material recovery operations can accumulate, will be swept and cleaned throughout the day.

AQ13. The facility shall implement the Alternative Odor Management Plan contained in the TPR included as Appendix B. Should all efforts to mitigate odor complaints fail, the facility may need to provide rapid opening/closing doors and a negative pressure air system.

AQ14. Should odor complaints go unabated, limits on the types of waste materials accepted or a reduction in the amount of incoming tonnage may be specified by the LEA.

An Alternative Odor Management Plan which is included in **Appendix E** of **Appendix H** will be implemented.

Comment BC2-6 – The Final MND differs from the Draft by correcting an apparent typographical error at page 38 indicating that the permit would allow the facility to expand to a 500 ton per day municipal solid waste facility as opposed to a 400 ton per day municipal solid waste facility. The Final MND leaves in a comment that "Facilities such as this divert material from the landfill through recycling." We are uncertain whether the proposed Project is intended to divert MSW. While that may have been the function of the facility with respect to CDI, we don't think that is the function of an MSW facility.

Response BC2-6 – The corrected tonnage was in fact a typographic error. The project is clearly defined in Section 1 as a "proposed Large Volume Solid Waste Facility Permit to operate a 500 ton per day (TPD) transfer/processing facility at 3720 Noakes Street in the City of Los Angeles." Direct Disposal will continue to operate as a construction and demolition (C&D) material recycling facility and the intent it to recover recyclable materials from the waste streams processed at the facility. For purposes of the Direct Disposal facility, material from garage cleanouts is considered MSW. Direct Disposal is a Certified C&D processor with a diversion rate of 75.91 percent per the City of Los Angeles Sanitation and Environment. MSW will not be processed over the sort line, and any material classified as MSW will be temporarily stored inside a building and transferred to a permitted landfill. It must be further noted that Title 14 of the California Code of Regulations sets the State Minimum Standards for handling all material processed at the Direct Disposal facility and these regulations are enforced by the LEA. Any MSW will be processed on a first-in, first-out basis within 48 hours or being received.

Comment BC2-7 – At page 46 of the Final MND PDF, there is trip summary information indicating that the Project will have 273.78 trips per day for six days a week, which works out to 1642.68 trips per week or 85419.36 trips per year. The CalEEMod worksheets reflect annual VMT of 1,538,699 which means a trip length of about 18 miles per trip. In the first place, we do not see that the agency has any basis for concluding that the average trip length will be this short. Additionally, and more importantly, the Draft MND conceded that the Project will operate 24 hours per day, ***seven*** days per week, not ***six*** days per week. Final MND page CM-9 discloses that the Project is just barely under the NO_x threshold at 54.54743 pounds of NO_x per day, when SCAQMD's operational significance threshold is 55 pounds per day. It is apparent that the agency or its consultant has "cooked the books" to try to reduce emissions below SCAQMD's regional significance standard.

The Final MND assumes a trip rate of 273.78 trips (average) for Saturdays and this number therefore needs to be applied to Sundays as well. When we do this, we discover that the agency and its consultant have underestimated the trip rate by 1/7, so total emissions would be as follows:

25.0742 lbs/day NO_x from on-road mobile emissions
Divided by 6 = 4.1790 lbs/day of NO_x
Added to 25.0742 = 29.2532 lbs/day of NO_x from on-road mobile emissions

With 29.2532 lbs/day of NO_x from on-road mobile emissions, the Project would have total emissions of approximately 58.72643 lbs/day of NO_x, which exceeds the SCAQMD threshold.

It's true our calculation is only relevant if CalEEMod relies on the annual VMT number to calculate NO_x, as opposed to a daily figure, but we are relatively confident that that is the case or else there would have been no reason to calculate annual VMT.

We also note that the ***Draft*** MND does not posit ***any*** construction for the Project, whereas the CalEEMod analysis in the ***Final*** MND appears to contemplate ***construction emissions*** from both demolition and construction. The construction emissions of diesel equipment, assuming there are any, and apparently there are, should have been evaluated in a construction Health Risk Assessment. Again, this was not done.

Response BC2-7 – The air quality analysis contained in the Final IS/MND was reviewed by Yorke Engineering, LLC (**Appendix F**) and concluded that air quality impacts would not exceed any SCAQMD thresholds and that there would not be any significant air quality impacts due to the proposed project. The Yorke Engineering, LLC report further concluded that the NOx emissions were overstated in the Final IS/MND by approximately 3.3 pounds per day. Daily emissions do not change due to Sunday operations and no SCAQMD thresholds will be exceeded. Annual greenhouse gas emissions have been revised to reflect Sunday operations and have been found to be less than significant (see **Appendix F**).

As previously addressed in **Response BC2-4 w**hile the project does not meet the SCAQMD criteria, a screening level health risk assessment (HRA) has been prepared for the project and is included in **Appendix G**. The HRA conservatively estimated 109 heavy duty (HD) diesel fueled trucks per day using the facility. The results of the screening level HRA indicate that the maximum cancer risk score would be 0.42 within 100 meters (328 feet) of the project site and that the cancer risk score at the nearest homes located 1,075 feet to the North is estimated to be 0.02. A cancer risk score below 1 indicates a low level of public risk. These results indicate that exposure to toxic emissions from the Facility would not lead to significant public health risks.

There is no new construction proposed. The inclusion of construction related emissions was an error and no construction related emissions would occur as a result of the proposed project.

Comment BC2-8. Responses to April Fitzpatrick Comments The LEA wholly abdicates its responsibilities to local residents in its response to April Fitzpatrick's comment that the roads are not in good condition by telling Ms. Fizpatrick that she has to contact the Bureau of Street Services to address the question herself, even though it is clearly Direct Disposal's. This is offensive. LEA is a part of LADBS which is part of the City of Los Angeles, and the responsibility is that of the City of Los Angeles. We'll probably follow up if you won't, but it probably won't be in a way you want.

Response BC2-8. Direct Disposal conducts litter patrols and street sweeping to minimize the prevent damage to vehicles from nails or debris. Maintenance of the local street system, which is also used by heavy duty on-road trucks servicing the surrounding warehouses, is the City's responsibility and outside the purview of LEA.

Comment BC2-9. Responses to April Fitzpatrick Comments Ms. Fitzpatrick has also commented that Direct Disposal customers/transporters come to the Direct Disposal Facility at an excessively high rate

of speed, and that the trucks deposit trash, nails, and metal pieces and wood which damage tires. The fact that there must be tarps on trucks does not mean that they do not deposit these items on local streets, and apparently, cleanup efforts are not adequate. It is also impossible for Ms. Fitzpatrick to develop the conclusive evidence you demand to prove that the materials on the streets came from Direct Disposal operations but it is highly likely that they do.

Response BC2-9. All drivers are required to adhere to the posted speed limits off-site or risk a traffic violation citation. Issuing such citations is outside the purview of the LEA and facility operator. The operator will continue to ensure drivers adhere to posted speed limits on-site and continue to remind drivers of local speed limits.

In response to the commentator's point regarding customers not covering their loads, it is the operator's policy to not allow use of the facility unless the incoming load is tarped, and that policy is enforced. In addition, all outbound material loads are prohibited from leaving the site unless they are tarped. Direct Disposal has a litter control plan and designated employees assigned to sweeping and picking up litter in the area and will continue to implement that plan.

Comment BC2-10. Ms. Fitzpatrick also has concerns regarding dust. The fact that SCAQMD has been called out before and has not cited the developer does not mean there is not a problem. We're sure SCAQMD gives businesses the opportunity to address identified issues.

Response BC2-10. Comment noted. The facility has not received any violation or correction notices from the SCAQMD. In addition, incorporation of a new overhead misting system included as project mitigation will reduce dust to less than significant levels. See the following mitigation measures proposed:

AQ1. All incoming material shall be tipped inside the building during periods when wind speeds are greater than 15 miles per hour (mph) averaged over a 15-minute period, or when instantaneous wind speeds exceed 25 mph. Fencing, tarping, watering, misting, wind screens and other appropriate means will also be used to prevent liter and dust from blowing around outdoor tipping and storage areas.

AQ9. A misting system over tipping and transfer/load-out areas, as needed, will be used to control potential odors as well as dust emissions.

Comment BC2-11. With respect to Ms. Fitzpatrick's suggestion that the Project's impacts be mitigated by full enclosure of Direct Disposal's operations, we note that the Municipal Code provides that there should be a concrete block wall around the facility, and a five-foot landscaped buffer, whether it is considered a "Recycling Materials Sorting Facility" or a "Recycling Materials Processing Facility," and apparently this is not presently the case for some reason.

Footnote. We also note that Los Angeles Municipal Code section 12.19A4(b) says noise cannot exceed the levels provided in section 111.03 of the Code as measured from any point on the adjacent property in an A, R, C, P, or M zone. Ms. Fitzgerald's company may have a claim against Direct Disposal under this provision. Section 12.19A4(b) further provides that the use must be conducted within an enclosed

building or within a solid fence not less than eight feet in height (this does not derogate from the more specific block wall requirement set forth in 12.19A18(e) or (f)), that there must be paved off-street parking, which apparently is not the case for all trucks visiting the Project site presently, and again that there must be landscaping.

Response BC2-11. Along Noakes Street landscaping was installed and is in place as are the required block and solid walls. The use of land issued by Los Angeles Department of Building and Safety found that the required screening and landscaping were provided as required, and a certificate of occupancy was issued (see **Appendix I** for C of O and photograph or existing block wall and landscaping.) A solid metal fence provides screening around the perimeter of the site not fronting on a public street.

Comment BC2-12. Ms. Fitzpatrick also notes that there is particulate matter (dust) coming from the fact that trucks park on the unpaved sides of the roads, and the LEA responds that this is not its problem. We're not sure the LEA's CalEEMod analysis adequately addressed this source of PM10 and PM2.5. Again, whether Direct Disposal is responsible for this paving or not, a City entity is, and nothing has been done about it.

Response BC2-12. Fugitive dust emissions from on and off-road vehicles was included in the Final IS/MND Table CM-1 as well as in **Table 1** of this errata, and it was determined that no significant impacts will occur. The project is not subject to the Highway Dedication (R-3) requirements set forth under LAMC Section 12.37 which prescribes street dedication and improvements associated with development projects.

Comment BC2-13. We also note that, with respect to Ms. Fitzpatrick's comment on dust and debris from the rail line nearby, that the LEA did not conduct a cumulative impacts analysis, contrary to CEQA.

Response BC2-13. Cumulative impacts are typically included in an EIR and account for projects that are not developed but in the permitting process. A cumulative impacts analysis was not required for the proposed MND, but, notably, project specific particulate emissions do not exceed SCAQMD thresholds, therefore cumulative impacts would not be expected to occur.

Comment BC2-14. In response to our Comment BC-3 and BC-4, the LEA asserts that the Project site is 3720 Noakes Street, but this is not fully accurate for CEQA purposes, which would include vehicle parking. The purpose of CEQA is to review "the whole of an action," which the MND does not do. The increased tonnage, traffic and increased waste and waste streams will impact local residents within 1,000 feet of both sites. It matters not whether sorting occurs at 3719 Noakes Street.

Response BC2-14. 3719 Noakes Street is not part of the proposed project and parking is currently permitted on the site. No changes are proposed under the project for the property at 3719 Noakes Street. The Draft IS/MND documented the potential impacts from the proposed increase in permitted tonnage on the environment and surrounding residents.

Comment BC2-15. As we already stated above, the ARB's Air Quality and Land Use Handbook is used and should be used in evaluating CEQA impacts. Further, the LEA has failed to prepare a Health

Risk Assessment with respect to either construction or operation of the Project. See the Handbook at 15: "Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day . . .)."

Response BC2-15. The site is over 1,000 feet from residences and the nearest sensitive receptors as shown in **Figure 7.** As shown in **Table 2** on page 39, a total of approximately 109 additional truck trips are anticipated from the proposed project as follows: 58 roll-off trucks which are fueled by both diesel and Compressed Natural Gas (CNG), 15 transfer trucks which are all diesel fueled and 36 self-haul vehicles which are a mix of diesel and gas fueled trucks. The main source of toxic air contaminants (TACs) is from heavy duty diesel (HD) trucks. HD trucks release diesel particulate matter (DPM) that is regulated as a carcinogen. DPM is not regulated for any short-term (acute) non-cancer health effects.

The project is not a warehouse distribution facility, or a truck stop and would not generate over 100 new diesel truck trips per day given that a large percentage of the vehicles using the facility are CNG and gas fueled. While the project does not meet the SCAQMD criteria for preparation of a HRA, nevertheless a screening level health risk assessment (HRA) has been prepared for the project and is included in **Appendix G** The HRA conservatively estimated 109 heavy duty (HD) diesel trucks per day. The results of the screening level HRA indicate that the maximum cancer risk score would be 0.46 within 100 meters (328 feet) of the project site and that the cancer risk score at the nearest homes located 1,075 feet to the North is estimated to be 0.02. A cancer risk score below 1 indicates a low level of public risk. These results indicate that exposure to toxic emissions from the Facility would not lead to significant public health risks.

Comment BC2-16. In Comment BC-5, we asked whether notice was given to nearby residents on Los Palos, Prada, and La Puerta Streets. The response was that it was only given to residents within 500 feet of 3720 Noakes, not 3719. Again, this is insufficient. The Public Resources Code requires notice to owners and occupants of contiguous property. Presuming that includes notice to properties contiguous to 3719 Noakes, and that that means properties on the other side of the street, notice should have gone much further than it did.

Response BC2-16. 3719 Noakes Street will not be used for refuse transfer, recyclable material sorting or processing and will not be included in the solid waste facility permit and it is not contiguous with the project site.

Public notices were mailed to all property owners and residents within 500 feet of 3720 Noakes Street. The radius map and mailing lists are included in **Appendix K**. Also, see **Figure 6** on page 11 for showing that there are no residentially zoned properties within a 1000-foot radius of the project site.

Comment BC2-17. In Comment BC-6, the MND acknowledges the need for a CUP for a Recycling Materials Sorting Facility in an M-3 Zone if the Facility is less than 1,000 feet from an A, R, C, P or PB zoned property. The Facility, as reflected in the TPR, includes 3719 Noakes Street. Also, the Facility is operating 24 hours per day and requires a CUP because it is less than 1,000 feet from an R zone. With

all due respect, whether 3719 Noakes Street involves recycling materials sorting or not, the MND should have evaluated it because it is used for some functions.

Response BC2-17. As shown in **Figure 6**, the property at 3720 Noakes Street is located more than 1,000 feet from A, R, C, P or PB zoned land, and under Los Angeles Municipal Code (LAMC) Section12.21 A 18(e) states in part that Recycling Materials Sorting Facilities shall be permitted in the M3 Zone without obtaining a conditional use permit. A certificate of occupancy has been issued by the City of LA Department of Building and Safety to allow use of 3720 Noakes Street as a recycling material sorting facility (see **Appendix I**). No change in use is proposed at 3719 Nokes Street which is permitted for parking (also see **Appendix I**).

Los Angeles Department of Building and Safety has reviewed and approved the operation of a recycling materials sorting facility at 3720 Noakes Street (see **Appendix I** for the Certificates of Occupancy) and a CUP was not required.

Comment BC2-18. In Comment BC-7, we noted that LAMC section 12.21A18(e) does not apply because it only covers Recycling Materials Sorting Facilities at which no processing is permitted. The present Facility shreds and processes recyclable materials and should have been permitted under section 12.21A18(f) instead, and it would require a CUP. While the LEA contends that the Project is more than 1,000 feet away, this excludes the 3719 Noakes Street portion of the Project site.

Response BC2-18. A certificate of occupancy was issued by the Los Angeles Department of Building and Safety to change the use at 3720 Noakes Street from a warehouse to a recycling materials sorting facility (see **Appendix I**). The Los Angeles Municipal Code (Section 12.03 defines a "RECYCLING MATERIALS SORTING FACILITY" as "a facility which accepts commingled or source-separated recyclable materials of various types, which are separated on the site using a manual or automated system. For purposes of this definition, source-separated Recyclable Materials are those which are separated from the waste stream at their point of generation for the purpose of recycling. This may include baling or crushing operations for the purposes of efficiency of storage and transfer (volume reduction), but shall not include processing activities for other than temporary storage purposes. The Los Angeles Municipal Code (Section 12.03 defines a RECYCLING MATERIALS PROCESSING FACILITY as a facility which accepts Recyclable Materials for sorting and processing on the site. For the purpose of this definition, processing shall mean the process of changing the physical characteristics of a Recyclable Material, including the shredding, smelting, grinding and crushing of cans, bottles, and other materials, for other than temporary storage purposes. Any shredding, baling or processing of recyclable materials a Direct Disposal is for temporary storage purposes and therefore permitted under LAMC Section 12.21A18(e).

Comment BC2-19. The LEA asserts that "Refuse Transfer Stations" are specifically permitted by right in the M-3 zone as set forth in the City's "Zoning Use List No. 2." We've downloaded Use List No. 2, and it says under paragraph B "Refer to appropriate section of Code for special restrictions or conditional use right applicable to many of the following uses." There is no indication as a result of that List that any use is permitted as of right. See Exhibit C.

Response BC2-19. The appropriate section of the code can be found in LAMC Section 12.20A5(b) which lists limitations on conducting a refuse transfer station use in the M3 zone. These limitations have been complied with and include:

(1) The use shall be conducted wholly within an enclosed building, or shall be completely enclosed with a solid wall or solid fence not less than eight feet in height with necessary solid gates of like height.

(2) Where a required wall or fence has been erected between the area wherein the use is conducted and a street, no material is stored to a height greater than that of such wall or fence within 50 feet thereof unless the height of the wall or fence is 10 feet or more in which case the distance within which no material may be stored above the height of the wall or fence shall be 37 feet. Provided, however, that a scrap metal processing yard that is entirely located at least 500 feet from a more restrictive zone, is exempt from the above stacking limitations.

(3) Paved off-street parking spaces have been provided as specified in Section 12.19 A.4.(b)(4).

(4) Landscaping is provided as specified in Section 12.19 A.4.(b)(5).

In obtaining the certificate of occupancy to conduct recycling material sorting operations on the 3720 Noakes Street site Direct Disposal was required to meet all the above conditions.

Comment BC2-20. In BC-11 we noted that the Draft MND stated that the Facility has been a "medium volume solid waste transfer and processing facility" since 2008. Whether or not this point was clarified in the Final MND, this is not enough. The City has hardly sent the Final MND and Responses to Comments to a wide readership.

Response BC2-20. Electronic versions of the Draft and Final IS/MND are still available on the LEA's website (https://www.ladbs.org/services/core-services/code-enforcement/lea-information) and CEQANet (https://ceqanet.opr.ca.gov/2019079096/2 and https://ceqanet.opr.ca.gov/2019079096/3). Hard copies of the Draft IS/MND were also available for review at the Robert Lois Stevenson neighborhood public branch library and LEA's office.

See **Appendix K** for the mailing list and radius map. All public notice requirements have been met. The the Draft IS/MND was also sent to the following elected officials and community organizations:

Councilmember Jose Huizar
200 N. Spring Street, Room 465
Los Angeles, CA 90012
Attn: Paul Habib, Chief of Staff

Supervisor Hilda Solis
856 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Boyle Heights Neighborhood Council
2130 East First Street, Suite 110
Los Angeles, CA 90033
Attn: Veronica Polanco, President

Senator Maria Elena Durazo
1808 W. Sunset Blvd.
Los Angeles, CA 90026

Assemblymember Miguel Santiago
320 West 4th Street, Room 1050
Los Angeles, CA 90013

Representative Jimmy Gomez
350 S. Bixel Street, #120
Los Angeles, CA 90017

Comment BC2-21. In BC-12 we noted that the Draft MND was fundamentally misleading in including the statement in the TPR that the MND was already adopted. This likely deterred (and was calculated to deter) commenters by making the public think that the Project was already approved. The LEA said in response that people came to the MND either through the notices or the newspaper notice. That's not how we got to it. And there should have been far more publication than there was.

Response BC2-21. A notice of availability and notice of intent to adopt a MND was circulated to all residents and property owners within 500 feet of 3720 Noakes Street. The notice was also sent to City Planning, the Boyle Heights Community Council, and the State Clearinghouse. Hardcopies of the Draft IS/MND were place at the Robert Louis Stevenson Branch Library and the document was uploaded to CEQA Net and the LEA website. A Public Information Meeting (PIM) was conducted by the LEA via Zoom after issuance of the Final MND. Notices were mailed to all parties commenting on the Draft IS/MND as well as property owners and occupants within 500 feet of the project site. There was no opposition to the proposed project at the PIM. The Final IS/MND was mailed to all persons that commented on the DEIR and also uploaded to CEQA Net and the LEA website. Copies of all relevant notices are included in **Appendix K**.

Comment BC2-22. We also commented that the LEA's website nowhere indicated when comments were due. This is insufficient under CEQA. Additionally, we note that the "general circulation" newspaper the LEA used hardly appears to be a "general circulation" newspaper for the area, having a minimum circulation, and this was likely intentional on the LEA's part. Providing notice to residents and occupants within 500 feet and putting a notice in a newspaper is clearly the minimum notice the LEA could have provided under law.

Response BC2-22. The notice of availability and notice of intent to adopt a MND which was posted on the LEA's website and mailed to all property owners and occupants within 500 feet included a statement that all comments were due no later than 5:00 pm on August 30, 2019.

A public notice that requested all comments by 5:00 pm on August 30, 2019, was also published in the Downtown News which per the Los Angeles County Registrar-Recorder/County Clerk, is a general circulation newspaper. See **Appendix K** for proof of publication in the newspaper.

Comment BC2-23. In Comment BC-16 we noted that the TPR and the Draft MND were apparently inconsistent, because the Draft MND notes an "additional 274 daily vehicle trips (137 inbound and 137 outbound)," whereas the TPR indicated that the total number of trips anticipated was only 224. We tried to find an explanation for this discrepancy, but the Response to Comment fails to clarify the point in any way. This calls into question both the MND's Traffic Analysis and the CalEEMod operational analysis.

Response BC2-23. The Draft IS/MND analysis is correct and is based on the additional traffic associated with the increase in permitted tonnage. The TPR provides an overview of traffic associated with the full 500 ton per day permitted capacity. It should be noted that the TPR contained an error, and Table 2 should have reflected that 225 vehicles per day are estimated to use the facility at the permitted capacity of 500 TPD (not 224 vehicles per day) which would equate to 450 daily round trips (225 inbound and 225 outbound trips). The Draft IS/MND analyzed the traffic impacts of the proposed 326 TPD increase in permitted throughput and the resulting increase in inbound and outbound trips during the AM and PM peak hours to determine potential traffic impacts (the Direct Disposal Facility is currently permitted to receive 174 tons per day of CDI material).

The following table provides a breakdown of existing and proposed traffic and is consistent with the analysis included in the Draft MND that reflects the 274 new trips associated with the proposed 326 ton per day increase in permitted throughput:

Project Trip Generation Estimates

	Daily			AM Peak Hour			PM Peak Hour		
Land Use/Vehicle Type	In	Out	Total	In	Out	Total	In	Out	Total
EXISTING CDI FACILITY (174 TPD)									
Employee Vehicles	26	26	52	0	0	0	0	0	0
Roll-Off Trucks	30	30	60	2	2	4	3	2	5
Self-Haul Vehicles	24	24	48	2	2	4	1	1	2
Transfer Trucks	8	8	16	1	1	2	0	0	0
Total	**88**	**88**	**176**	**5**	**5**	**10**	**4**	**3**	**7**
PROPOSED FACILITY EXPANSION (326 TPD)									
Employee Vehicles	28	28	56	0	0	0	0	0	0
Roll-Off Trucks	58	58	116	3	3	6	3	3	6
Self-Haul Vehicles	36	36	72	3	3	6	2	2	4
Transfer Trucks	15	15	30	1	1	2	0	0	0
Total	**137**	**137**	**274**	**7**	**7**	**14**	**5**	**5**	**10**
TOTAL SITE TRIP GENERATION (Proposed + Existing)									
Employee Vehicles	54	54	108	0	0	0	0	0	0
Roll-Off Trucks	88	88	176	5	5	10	6	5	11
Self-Haul Vehicles	60	60	120	5	5	10	3	3	6
Transfer Trucks	23	23	46	0	0	0	0	0	0
Total	**225**	**225**	**450**	**10**	**10**	**20**	**9**	**8**	**17**

Note:

Trip generation estimates provided by Direct Disposal, and is based on a typical operation.

Comment BC2-24. In Comment BC-18, we raised concerns re odors in the area from solid waste ("MSW"), organic and green wastes. The Response was that all MSW will be removed within 48 hours and an odor control plan will be implemented. The Response to Comment asserts that the odor control plan is included in Appendix E to Appendix A to the Draft IS/MND. We were unable to access that odor control plan because the Draft IS/MND was taken down by the LEA. The Response further states that there will be an overhead misting system with "odor neutralizing agents." This plan is not reflected in the TPR, which we do have. In this connection, we also note that the LEA has failed to post its updated Mitigation Monitoring and Reporting Program ("MMRP") with the Final MND, contrary to CEQA. Further, we do not see where in the MMRP that MSW will be limited to 100 tons per day.

Response BC2-24. An odor control plan can be found in **Appendix E** of the Transfer/Processing Report which is included as **Appendix H** of this document. The Mitigation Monitoring and Reporting Program ("MMRP") is included as **Appendix A**.

The 100 ton limitation on solid waste is not a mitigation measure, it is part of the project description and it is anticipated that this limitation will be included as a condition of the solid waste facility permit. MSW will be limited to 100 tons per day and will be removed from the facility within 48 hours of receipt. An odor control plan (included as **Appendix E** of the **Appendix H** of this errata) will be implemented to reduce the potential for adverse impacts, and contact information will be posted at the facility to allow neighbors to notify the facility operator and local regulators including the Local Enforcement Agency and Air Quality Management District if odors are detected in the area. An overhead misting system is being required as a mitigation measure (AQ9), and with the introduction of odor neutralizing agents, will mitigate potential impacts to less than significant levels.

Comment BC2-25. We commented in BC-20 that compliance with Best Management Practices and the Industrial Storm Water General Permit would not necessarily reduce water quality impacts from runoff to less than significant levels. The LEA responded that Direct Disposal participates in a Stormwater Multiple Application and Report Tracking System ("SMARTS") to determine sources of contamination and track that contamination. The System is not described, and it appears to involve after-the-fact measures, indicating that stormwater will be polluted regardless of tracking.

Response BC2-25. The facility has a General Industrial Storm Water Permit (NPDES) with the State Water Resources Control Board (SWRCB), WDID# 4 191019849. A Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program Plan (MPP) have been developed and implemented. In compliance with the General Industrial Storm Water Permit, stormwater testing is conducted each year, and the results are uploaded into the SMARTS system.

Comment BC2-26. We have already reiterated our concern that the Project cannot be developed "by right" and that the City's Zoning List No. 2 does not provide that authority, as Exhibit C discloses.

Response BC2-26. Comment noted. The City's Zoning Code provides development standards for recycling materials sorting and refuse transfer projects. The certificates of occupancy included in **Appendix I** show that the land use is consistent with the Zoning Code.

Comment BC2-27. California Public Utilities Commission Comments LEA's response to California Public Utilities Commission Comment C-3 is dismissive and inadequate. As the Commission states, "Traffic impact studies should analyze rail crossing safety and potential mitigation measures." Whether the Los Angeles Department of Transportation has said that a traffic study is not necessary because the Project won't generate am and pm peak trips above the DOT's threshold does not address the Commission's point that upgrading of the crossing, warning devices, warning surfaces, and edge lines on sidewalks and pedestrian channelization may be appropriate.

Response BC2-27. Comment noted. The PUC did not have any issues, comments, or concerns with the response to their comments in the Final MND.

Comment BC2-28. Thank you for your attention to these comments. We look forward to participating in the LEA's consideration of the Proposed Project via Zoom on October 22. Please keep us informed of all developments on the Project.

Response 28. Comment noted and thank you for your input.

APPENDIX F

YORKE ENGINEERING, LLC THIRD PARTY REVIEW OF FINAL IS/MND AIR QUALITY ANALYSIS AND SWAPE COMMENT LETTER

Yorke
ENGINEERING, LLC
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August 4, 2021

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Subject: Third-Party Review – Responses to SWAPE Comments on CEQA Air Quality and GHG Study and Screening HRA for Direct Disposal Solid Waste Facility Expansion in Los Angeles, CA

Dear Mr. Miner:

Yorke Engineering, LLC (Yorke) has completed its third-party review of comments provided by Soil-Water-Air Protection Enterprise (SWAPE) in its letter dated November 20, 2020 *Comments on Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project (SCH [State Clearinghouse] No. 2019079096)*. SWAPE's review concerned the August 2020 *Final Initial Study/Mitigated Negative Declaration [IS/MND] Direct Disposal Large Volume Solid Waste Transfer/Processing Facility SCH No. 2019079096.* SWAPE's letter is provided in Attachment A.

As discussed below, it was determined that the SWAPE analysis was flawed and the project would not exceed any South Coast Air Quality Management District (SCAQMD) significance thresholds, including the 55 pounds per day operational NO_X threshold.

BACKGROUND

Clements is working on the Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project located at 3720 Noakes Street in the City of Los Angeles (the City). The project proposes to expand the existing 175 tons per day (TPD) Direct Disposal Medium Volume Construction, Demolition, and Inert (CDI) Material Recovery Facility to accommodate a Large Volume Solid Waste Facility Permit that processes up to 500 TPD of CDI and solid waste. The project site is within the jurisdiction of the SCAQMD.

In its letter, SWAPE made statements suggesting that the IS/MND failed to adequately evaluate the project's air quality, health risk, and GHG impacts. The letter had specific comments related to the *California Emissions Estimator Model*® (CalEEMod) analysis included in the IS/MND. In addition, SWAPE performed a screening-level health risk assessment (HRA) using AERSCREEN and identified feasible GHG mitigation measures for the project.

PEER REVIEWS

The Draft IS/MND was released in July 2019 and the Final IS/MND was released in August 2020. The introductory paragraph in SWAPE letter states "We have reviewed the July 2019 Draft Initial Study/Mitigated Negative Declaration ("IS/MND"), as well as the August 2020 Final Initial Study/Mitigated Negative Declaration ("FIS/MND"), for the Direct Disposal Large Volume Solid

Waste Transfer/Processing Facility Project ("Project") located in the City of Los Angeles ("City")." Our peer review comments and findings are summarized below by topic.

Air Quality Analysis

Page 2:

SWAPE Comment (2020): "When reviewing the Project's CalEEMod output files, provided in the Air Quality Modeling Worksheets as Appendix CM-I to the FIS/MND, we found that several model inputs were not consistent with information disclosed in the IS/MND and FIS/MND. As a result, the Project's construction and operational emissions are underestimated. A Project-specific EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality."

Yorke Response: As discussed below, this SWAPE comment is unfounded.

SWAPE Comment (2020): "Use of an Underestimated Sunday Trip Rate" et seq

Yorke Response: SCAQMD criteria pollutant significance thresholds evaluate daily emissions (lbs/day) regardless of the day of the week. Thus, the 6-day trip rates would nevertheless apply, and daily results would be same if the facility operated 7 days a week with the same trip rates, which SWAPE insists is the correct approach. However, in obvious context, the term daily means business days (i.e., Monday – Saturday) and the facility would normally be closed on Sundays, although the facility will have the option of operating on Sundays. These operations would not exceed SCAQMD emission thresholds, including the NOx threshold of 55 pounds per day. The SWAPE comment is misleading and moot.

Pages 3 & 4:

SWAPE Comments (2020): "Underestimated Number of Pieces of Operational Off-Road Equipment" et seq; and "Unsubstantiated Changes to Operational Off-Road Equipment Horsepower Values" et seq

Yorke Response: SCAQMD-approved off-road emission factors[1] (EFs) were used in the custom worksheets in the IS/MND to calculate emissions from off-road equipment to be used during project operation[2]. The excerpted images SWAPE inserted into the letter don't show the EFs or the calculations, which is misleading, and an apparent attempt to claim that the operational off-road equipment was left out of the emissions inventory, which is not true.

Contrary to SWAPE's remarks, the results of the IS/MND emission calculations are clearly presented in the Final IS/MND Table CM-1: Project Operational Emissions (with mitigation measures incorporated) and include on-site fugitive dust (materials handling and vehicle travel), criteria pollutants, and GHGs.

[1] SCAQMD Off-Road Model Mobile Source Emission Factors (Scenario Years 2007-2025). http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors

[2] The SCAQMD EFs for each equipment type incorporate the equipment-specific load factor (LF)

Using the SCAQMD EFs and the same assumptions, i.e., potential to emit (PTE) operating data, Yorke was able to replicate (verify) the Final IS/MND operational off-road equipment emission calculation results shown in Table CM-1, as shown in Table 1.

Table 1: Verification of Operational Off-Road Emissions – Criteria

Equipment	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
SCAQMD Emission Factors	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**
Excavators Composite	0.0733	0.4042	0.5124	0.0013	0.0184	0.0182
Rubber Tired Loaders Composite	0.0753	0.4747	0.4406	0.0012	0.0235	0.0233
Other Material Handling Equipment Composite	0.0924	0.6500	0.4429	0.0015	0.0252	0.0249
Skid Steer Loaders Composite	0.0222	0.1614	0.2125	0.0004	0.0050	0.0049
IS/MND Emissions	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**
Excavators Composite (2)	1.61	8.89	11.27	0.03	0.40	0.40
Rubber Tired Loaders Composite (3)	1.81	11.39	10.58	0.03	0.56	0.56
Other Material Handling Equipment Composite (1)	1.02	7.15	4.87	0.02	0.28	0.27
Skid Steer Loaders Composite (1)	0.24	1.77	2.34	0.00	0.05	0.05
Totals	**4.68**	**29.20**	**29.06**	**0.08**	**1.29**	**1.28**

Using the CalEEMod default brake horsepower (BHP) ratings with the SCAQMD EFs (i.e., interpolated to match BHP exactly), operational off-road results shown in Table 2 are similar to those shown in Table 1:

Table 2: Specific BHP Operational Off-Road Emissions – Criteria

Equipment	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
SCAQMD Emission Factors for BHPs	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**
Excavators (158 BHP)	0.0666	0.3821	0.6125	0.0011	0.0198	0.0196
Rubber Tired Loaders (203 BHP)	0.0797	0.5065	0.5074	0.0014	0.0231	0.0229
Other Material Handling Equipment (89 BHP)	0.0588	0.3146	0.3644	0.0006	0.0202	0.0200
Skid Steer Loaders (65 BHP)	0.0227	0.1653	0.2149	0.0004	0.0048	0.0047
IS/MND Emissions for BHPs	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**
Excavators (158 BHP) (2)	1.46	8.41	13.47	0.03	0.44	0.43
Rubber Tired Loaders (203 BHP) (3)	1.91	12.16	12.18	0.03	0.55	0.55
Other Material Handling Equipment (89 BHP) (1)	0.65	3.46	4.01	0.01	0.22	0.22
Skid Steer Loaders (65 BHP) (1)	0.25	1.82	2.36	0.00	0.05	0.05
Totals	**4.27**	**25.85**	**32.02**	**0.07**	**1.26**	**1.25**

The IS/MND used CalEEMod to estimate construction emissions and operational emissions other than the off-road equipment, i.e., area sources, energy consumption, and on-road mobile sources. The CalEEMod emissions comprise criteria pollutants and GHGs.

The number of pieces of operational off-road equipment are fully accounted for in the custom worksheets and Table CM-1 for typical (composite) horsepower ratings. The SWAPE claims of "underestimated number of pieces of operational off-road equipment" and "unsubstantiated changes to operational off-road equipment horsepower values" in CalEEMod (i.e., set to zeros in CalEEMod as null values) are irrelevant because the operational off-road calculations (replicated in Table 1) were not done in CalEEMod. The SWAPE comment is maligned and erroneous.

Page 5:

SWAPE Comment (2020): "Updated Analysis Indicates a Potentially Significant Air Quality Impact" et seq

Yorke Response: SWAPE claims that by running CalEEMod "correctly", they obtained a potentially significant operational NO_X impact of 72.42 lbs/day, which would be above the SCAQMD's 55 lbs/day NO_X threshold. SWAPE states that "In our updated models, we corrected the Sunday trip rate [which is moot, see above], included the correct number of pieces of operational off-road equipment, and omitted the unsubstantiated reductions to the operational off-road equipment horsepower values." For the operational off-road equipment, SWAPE's assumptions for CalEEMod input are reproduced below from the SWAPE CalEEMod run:

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	3	8.00	312	203	0.95	Diesel
Forklifts	1	11.00	312	89	0.20	Diesel
Skid Steer Loaders	1	11.00	312	65	0.95	Diesel
Excavators	2	11.00	312	158	0.38	Diesel

What SWAPE doesn't say is that <u>they themselves made unsubstantiated changes</u> to two of the off-road engine load factors[3] in their CalEEMod run. This was apparently done to inflate NO_X emissions to above the threshold in order to make the proposed project appear to have a significant impact when it would otherwise not. SWAPE changes to the CalEEMod load factors (LFs) are documented below:

- Excavators (2 @ 158 BHP): 38% default used
- Rubber Tired Loaders (3 @ 203 BHP): changed to 95%; default is 36%
- Forklifts (1 @ 89 BHP): 20% default used
- Skid Steer Loaders (1 @ 65 BHP): changed to 95%; default is 37%

In particular, for the 3 largest engines (Rubber Tired Loaders, 203 BHP each) SWAPE arbitrarily inflated emissions by a factor of 2.639 (i.e., 95/36). For the 65 BHP Skid Steer Loader, emissions were similarly inflated by a factor of 2.568 (i.e. 95/37). However, consistent with the CalEEMod default engine BHPs used by SWAPE, when the default LFs are correctly applied, the operational off-road NO_X emissions decrease by 23.97 lbs/day, which, in turn, decreases overall operation NO_X emissions from SWAPE's claim of 72.4 lbs/day to 48.4 lbs/day, which is below the 55 lbs/day threshold. These corrective calculations are shown in Table 3 (emissions are linear with respect to load factor).

[3] CalEEMod 2016.3.2 Appendix D, Table 3.3 – Offroad Default Horsepower and Load Factors

Table 3: SWAPE CalEEMod Results and Corrections

Equipment	ROG	NO_X	CO	DPM	DPM	Load Factor
As Modeled by SWAPE	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/yr)**	**(modeled)**
Excavators (158 BHP) (2)	0.67	6.63	8.99	0.32	100.28	38%
Rubber Tired Loaders (203 BHP) (3)	2.96	34.91	12.95	1.16	361.58	95%
Forklifts (89 BHP) (1)	0.20	1.78	1.62	0.13	41.46	20%
Skid Steer Loaders (65 BHP) (1)	0.28	3.75	4.91	0.16	50.67	95%
Totals	**4.12**	**47.08**	**28.46**	**1.78**	**553.99**	
Corrected to All Defaults	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/yr)**	**(default)**
Excavators (158 BHP) (2)	0.67	6.63	8.99	0.32	100.28	38%
Rubber Tired Loaders (203 BHP) (3)	1.12	13.23	4.91	0.44	137.02	36%
Forklifts (89 BHP) (1)	0.20	1.78	1.62	0.13	41.46	20%
Skid Steer Loaders (65 BHP) (1)	0.11	1.46	1.91	0.06	19.73	37%
Totals	**2.10**	**23.11**	**17.43**	**0.96**	**298.49**	
Change (default less modeled)	**-2.01**	**-23.97**	**-11.04**	**-0.82**	**-255.49**	

As shown in Table 3, when CalEEMod defaults are consistently applied, computed operational off-road NO_X emissions are in the same range as determined in the Final IS/MND and in this evaluation:

- IS/MND composite: 29.2 lbs/day (off-road upper bound)
- IS/MND specific BHP: 25.9 lbs/day (off-road mid-value)
- SWAPE CalEEMod all defaults: 23.1 lbs/day (off-road lower bound)

With Reference to Final IS/MND Table CM-1, per the above off-road results, total operational NO_X emissions would be:

- IS/MND composite: 54.5 lbs/day (total upper bound, Final Table CM-1)
- IS/MND specific BHP: 51.2 lbs/day (total mid-value)
- SWAPE CalEEMod all defaults: 48.4 lbs/day (total lower bound)

As shown above, in all cases where operational off-road emissions are correctly computed, total operation NO_X emissions would be below the SCAQMD threshold of 55 lbs/day for project operation and no additional mitigation would be required.

For the above reasons, SWAPE's conclusion that "…when modeled correctly, the NO_X emissions increase by 186% and exceed the SCAQMD threshold of 55 lbs/day. Thus, our model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the FIS/MND. As a result, an EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the surrounding environment" is objectively false because SWAPE, by arbitrarily overriding CalEEMod default load factors to inflate NO_X emissions, did not model correctly.

The Final IS/MND accurately estimated the potential air quality impacts of the proposed project, and no emissions thresholds would be exceeded, including NO_X. The SWAPE comment is egregious.

Health Risk Analysis

Page 7:

SWAPE Comment (2020): "SWAPE's updated operational CalEEMod emissions indicate that operational activities will generate 632 pounds of DPM per year throughout operation."

Yorke Response: This annual emission value (0.316 tons/yr per the SWAPE CalEEMod run) would decrease by 256 lbs/yr to 376 lbs/yr with application of CalEEMod default load factors shown in Table 3, which would lower computed risk by 40% (for any age bin, risk is proportional to exposure). Although SWAPE inflated emissions, thus casting doubt on its HRA results, reducing the 180 in million lifetime cancer risk by 40% would bring it down to approximately 100 in a million, which would still be above the 10 in million threshold for the screening-level analysis. Thus, refined-level HRA dispersion modeling using AERMOD would otherwise be indicated.

Page 8:

SWAPE Comment (2020): "Consistent with OEHHA, as recommended by the SCAQMD, BAAQMD, and SJVAPCD guidance"

Yorke Response: Since the project is located in the SCAQMD, the HRA should be conducted per OEHHA and SCAQMD guidelines only.

Pages 8-9:

Yorke Comment: Only the cancer risk calculated with the Age Sensitivity Factors (ASF) should be presented. The calculations without the ASFs are incorrect and do not represent the 2003 methodologies.

AERSCREEN setup:

Yorke Comment: The minimum temperature of -9.7 °F is too cold for Los Angeles; however, this would not affect an area source as much as a point source where hot plume buoyancy is greater at lower ambient temperatures. The area source would be less affected by the lower ambient temperature, and risks would be about the same for warmer temperatures. The area source seems a little large to fit on the site, but is acceptable for screening a receptor 1,000 feet (305 meters) away from the site.

General:

Yorke Comment: Assuming that Tier 4 engines would be used in all offroad equipment, and with sensitive receptors more than 1,000 feet (305 meters) away from the site (i.e., residential to the north, with interceding buildings), no operational HRA for offroad DPM emissions should be necessary. Note that of the 137 additional truck trips, 50% are estimated to be compressed or liquified natural gas (CNG or LNG) fueled, which eliminates DPM emissions from those trucks, thus mitigating overall risk.

Greenhouse Gas Analysis

SWAPE Comment (2019): "Failure to Evaluate Greenhouse Gas Impacts" et seq, in particular "The IS/MND and FIS/MND fail to quantify the Project's potential greenhouse gas ("GHG") impacts whatsoever."

Yorke Response: SWAPE's comment was true for the Draft IS/MND (2019), which did not address GHG emissions. However, the Final IS/MND Table CM-1 (2020) clearly shows estimated GHG emissions calculated in worksheets for the operational off-road equipment (i.e., 2 excavators, 3 loaders, 1 telehandler, and 1 skid steer loader) and the other operational sources computed in CalEEMod (i.e., area, energy, and on-road mobile). Total operational CO_2e emissions in Table CM-1 are 26,234 lbs/day. For 312 days/year operation, this is equivalent to 3,713 MT/year CO_2e, which is below the SCAQMD's 10,000 MT/year threshold for industrial sources. The SWAPE comment no longer applies because the Final IS/MND does quantify GHG impacts.

In the same manner as verifying criteria emissions using the SCAQMD off-road EFs (Table 1), Yorke also calculated GHG emissions, as shown in Table 4 using IPCC AR4 GWPs (CO_2 = 1, CH_4 = 25). The SCAQMD off-road EFs do not include N_2O because emissions of N_2O (GWP = 298) are essentially negligible, less than 1% of total CO_2e. [4]

Table 4: Verification of Operational Off-Road Emissions – GHG

Equipment	CO_2	CH_4	AR4 CO_2e	AR4 CO_2e
SCAQMD Emission Factors	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**	—
Excavators Composite	119.5795	0.0066	119.7448	—
Rubber Tired Loaders Composite	108.6109	0.0068	108.7807	—
Other Material Handling Equipment Composite	141.1941	0.0083	141.4026	—
Skid Steer Loaders Composite	30.2770	0.0020	30.3271	—
IS/MND Emissions	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(MT/yr)**
Excavators Composite (2)	2,631	0.15	2,634	373
Rubber Tired Loaders Composite (3)	2,607	0.16	2,611	369
Other Material Handling Equipment Composite (1)	1,553	0.09	1,555	220
Skid Steer Loaders Composite (1)	333	0.02	334	47
Totals (verification)	**7,124**	**0.42**	**7,134**	**1,010**
IS/MND Table CM-1 GHG	**7,140**	**0.42**	**15,962**	**2,259**

The results shown in Table 4 for daily emissions of CO_2 and CH_4 are virtually the same as shown in Table CM-1 (prior to application of GWPs). However, the daily CO_2e value in Table CM-1 is over twice the verification value, an error that overstates CO_2e emissions in the Final IS/MND.

The IS/MND used CalEEMod to compute operational emissions other than the off-road equipment listed in Table 4. Table 5 summarizes GHG emissions for 7 days per week operation.

Table 5: Operational Sources Emissions Summary – GHGs

Operational Sources	CO_2	CH_4	N_2O	AR4 CO_2e	AR4 CO_2e
IS/MND Emissions (CalEEMod)	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(lb/day)**	**(MT/yr)**
Area Emissions	0.0118	0.00003	—	0.0126	—
Energy Emissions	315.0363	0.00604	0.00578	316.9097	—
On-Road Mobile Emissions	9,946.1609	0.38680	—	9,955.8309	—
IS/MND CalEEMod Total	—	—	—	**10,273**	**1,701**
IS/MND Off-Road Total (Table 4 verification)	—	—	—	**7,134**	**1,181**
Project Operational Total	—	—	—	**17,407**	**2,882**

[4] Intergovernmental Panel on Climate Change Fourth Assessment Report (2007) Global Warning Potentials

As shown in Table 5, total operational GHG emissions would be approximately 2,900 MT/year CO_2e. This value is below the SCAQMD's 10,000 MT/year threshold for industrial sources[5], and below the SCAQMD's proposed threshold of 3,000 MT/year for general land use projects[6]. Thus, GHG emissions from the proposed project would be less than significant and no additional mitigation would be required.

SWAPE Comment (2020): "Feasible Mitigation Measures Available to Reduce Emissions" et seq

Yorke Response: Since project GHG impacts are less than significant, no additional mitigation measures are required. The SWAPE comment about additional mitigation measures is not applicable to the proposed project.

CLOSING

Thank you very much for the opportunity to be of assistance to Clements Environmental. Should you have any questions, please contact us at (805) 217-4947 (Brad's mobile) or (619) 375-9142 (Julie's mobile).

Sincerely,

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[5] SCAQMD 2019. Air Quality Significance Thresholds. Website (http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2)

[6] SCAQMD 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. Website (http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2)

ATTACHMENT A

SWAPE Letter, November 20, 2020

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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November 20, 2020

Hannah Bentley
Blum Collins Ho LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: **Comments on Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project (SCH No. 2019079096)**

Dear Ms. Bentley,

We have reviewed the July 2019 Draft Initial Study/Mitigated Negative Declaration ("IS/MND"), as well as the August 2020 Final Initial Study/Mitigated Negative Declaration ("FIS/MND"), for the Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project ("Project") located in the City of Los Angeles ("City"). The Project proposes to expand the existing 175 ton per day ("TPD") Direct Disposal Medium Volume Construction, Demolition and Inert ("CDI) Material Recovery Facility to accommodate a Large Volume Solid Waste Facility Permit that processes up to 500 TPD of CDI and solid waste. The Project would not include the construction of any additional floor area on the 1.24-acre site.

Our review concludes that the IS/MND and FIS/MND fail to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An EIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The FIS/MND's air quality analysis relies on emissions calculated with CalEEMod.2016.3.2 (p. CM-8).[1] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are utilized in calculating the Project's air pollutant emissions and make known which default values are changed as well as provide justification for the values selected.

When reviewing the Project's CalEEMod output files, provided in the Air Quality Modeling Worksheets as Appendix CM-I to the FIS/MND, we found that several model inputs were not consistent with information disclosed in the IS/MND and FIS/MND. As a result, the Project's construction and operational emissions are underestimated. A Project-specific EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Use of an Underestimated Sunday Trip Rate

According to the FIS/MND:

> "The increase in permitted throughput from the 175 TPD to 500 TPD would generate an additional 274 daily vehicle trips, the Project will generate 274 daily vehicle trips" (p. RTC-29).

As such, the Project's CalEEMod model should have included 274 average daily vehicle trips. However, review of the Project's CalEEMod output files demonstrates that the model includes zero Sunday vehicle trips (see excerpt below) (Appendix CM-I, pp. 46).

	Average Daily Trip Rate		
Land Use	Weekday	Saturday	Sunday
General Heavy Industry	273.78	273.78	0.00
Total	273.78	273.78	0.00

As you can see in the excerpt above, the average number of Sunday vehicle trips was underestimated by 274 trips in the model. Thus, the model is inconsistent with the information provided by the FIS/MND and estimates the Project's mobile-source operational emissions assuming an underestimated Sunday trip rate. This underestimation presents an issue, as CalEEMod uses the operational vehicle trip rates to

[1] CAPCOA (November 2017) CalEEMod User's Guide, http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4.

calculate the emissions associated with operational on-road vehicles.[2] Thus, by including an underestimated operational vehicle trip rate, the model underestimates the Project's mobile-source operational emissions and should not be relied upon to determine Project significance.

Underestimated Number of Pieces of Operational Off-Road Equipment

According to the FIS/MND:

> "The proposed project will increase the number of vehicles using the facility as well as the running times for *off-road diesel-powered equipment* used to process material at the facility" (emphasis added) (pp. 12).

As the above excerpt demonstrates, the Project proposes to use off-road diesel-powered equipment throughout operation to process material at the facility. Furthermore, the Air Quality Modeling Worksheets provide an operational off-road equipment list indicating the number, hours of operation, days per year, vehicle speed, and total daily miles of the anticipated operational equipment (see excerpts below) (Appendix CM-I, pp. 20-22).

Emissions Calculations - Loaders

Hp	2020 Composite
Hours of Operaton per Day	8
Number	3
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

Emissions Calculations - Bobcat (skid steer loader)

Hp	2020 Composite
Hours of Operaton per Day	11
Number	1
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

[2] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.caleemod.com/, p. 35.

Emissions Calculations - Telehandler

Hp	(2020 Other Material Handling Equipment Composite)
Hours of Operaton per Day	11
Number	1
Vehicle Speed (mph)	0.5
Total Daily Miles	5
Days/year	312

Emissions Calculations - Excavators

Hp	2020 Composite
Hours of Operaton per Day	11
Number	2
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

As you can see in the excerpts above, the Project operational is anticipated to utilize three loaders, one bobcat (skid steer loader), one telehandler (forklift), and two excavators. However, review of the Project's CalEEMod output files demonstrates that the model fails to include any pieces of operational off-road equipment (see excerpt below) (Appendix CM-1, pp. 50).

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	0	8.00	300	0	0.95	Diesel
Skid Steer Loaders	0	8.00	300	0	0.95	Diesel

As you can see if the excerpt above, the model fails to include any operational off-road equipment. By failing to include any number of operational off-road equipment, the model is inconsistent with the information provided in the IS/MND and FIS/MND and underestimates the Project's operational emissions related to off-road equipment.

Unsubstantiated Changes to Operational Off-Road Equipment Horsepower Values

Review of the Project's CalEEMod output files demonstrates that the model includes manual reductions to the Project's anticipated operational off-road equipment horsepower values (see excerpt below) (Appendix CM-1, pp. 25).

Table Name	Column Name	Default Value	New Value
tblOperationalOffRoadEquipment	OperHorsePower	203.00	0.00
tblOperationalOffRoadEquipment	OperHorsePower	65.00	0.00

As you can see in the excerpt above, the operational off-road equipment horsepower values were reduced to zero in the model. As previously mentioned, the CalEEMod User's Guide requires any

changes to model defaults be justified.[3] According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Solid waste facility permit" (Appendix CM-I, pp. 24). However, the FIS/MND and IS/MND fail to mention or justify any numerical values for operational off-road equipment horsepower values whatsoever. Thus, we cannot verify the revised values in the model. By incorrectly reducing the Project's anticipated operational off-road construction equipment horsepower values to zero, the model underestimates the Project's operational emissions related to off-road equipment and should not be relied upon to determine Project significance.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to determine the operational emissions associated with Project, we prepared updated CalEEMod models, using the Project-specific information provided by the FIS/MND. In our updated models, we corrected the Sunday trip rate, included the correct number of pieces of operational off-road equipment, and omitted the unsubstantiated reductions to the operational off-road equipment horsepower values.

Our updated analysis demonstrates that, when modeled using corrected input parameters, the nitrogen oxides ("NO_x") emissions associated with operation of the Project exceed the 55 pounds per day ("lbs/day") threshold set by the SCAQMD.[4]

Model	NO_X
Operation (FIS/MND)	25.34
Operation (SWAPE)	72.42
% Change	186%
SCAQMD Regional Threshold (lbs/day)	**55**
Threshold Exceeded?	***Yes***

As demonstrated above, when modeled correctly, the NO_x emissions increase by 186% and exceed the SCAQMD threshold of 55 lbs/day. Thus, our model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the FIS/MND. As a result, an EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the surrounding environment.

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The FIS/MND and IS/MND conclude that the Project's health risk impacts would be less than significant as a result of a localized significance threshold ("LST") analysis, without conducting a quantified operational health risk assessment ("HRA"). Specifically, regarding the Project's LST analysis, the FIS/MND states:

[3] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 2, 9
[4] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, Revised April 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf

> "[O]perational emissions would not exceed LSTs significance thresholds for NOx, CO, PM10, and PM2.5 emissions. Therefore, the proposed project's operational impacts on LSTs are considered less than significant" (p. CM-8).

Furthermore, regarding the Project's potential health risk impacts, the IS/MND concludes the project will not expose sensitive receptors to substantial pollutant concentrations because "[t]he site is over 1,000 feet from residences" (p. 19). However, the Project's health risk analysis, as well as the subsequent less-than-significant impact conclusion, are incorrect for three reasons.

First, the use of the LST method to determine the significance of the health risk impacts posed to nearby, existing sensitive receptors is incorrect. While the LST method assesses the impact of pollutants at a local level, it only evaluates impacts from criteria air pollutants. According to the *Final Localized Significance Threshold Methodology* document prepared by the SCAQMD, the LST analysis is only applicable to NO_x, CO, PM_{10}, and $PM_{2.5}$ emissions, which are collectively referred to as criteria air pollutants.[5] Because the LST method can only be applied to criteria air pollutants, this method cannot be used to determine whether emissions from toxic air contaminants ("TACs"), specifically diesel particulate matter ("DPM"), a known human carcinogen, will result in a significant health risk impact to nearby sensitive receptors. As a result, health impacts from exposure to TACs, such as DPM, were not analyzed, thus leaving a gap in the IS/MND and FIS/MND's analyses.

Second, the FIS/MND fails to prepare a quantified operational HRA. This is incorrect, as the FIS/MND indicates that Project operation would generate 274 daily vehicle trips, which will generate additional exhaust emissions and continue to expose nearby sensitive receptors to DPM emissions (p. RTC-29). Simply because the Project site is located over 1,000 feet from residences does not justify the omission of a quantified operational HRA. By failing to prepare a quantified operational HRA, the Project is inconsistent with the most recent guidance published by the Office of Environmental Health Hazard Assessment ("OEHHA"). The OEHHA document recommends that exposure from projects lasting more than 6 months be evaluated for the duration of the project, and recommends that an exposure duration of 30 years be used to estimate individual cancer risk for the maximally exposed individual resident ("MEIR").[6] Even though we were not provided with the expected lifetime of the Project, we can reasonably assume that the Project will operate for at least 30 years, if not more. Therefore, we recommend that health risk impacts from Project operation also be evaluated, as a 30-year exposure duration vastly exceeds the 6-month requirement set forth by OEHHA. These recommendations reflect the most recent state health risk policies, and as such, we recommend that an updated assessment of health risk impacts posed to nearby sensitive receptors from Project operation be included in an EIR for the Project.

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[5] "Final Localized Significance Threshold Methodology." SCAQMD, Revised July 2008, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

[6] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf, p. 8-6, 8-15

Third, by claiming a less than significant impact without conducting a quantified HRA to disclose the exposure levels to nearby, existing sensitive receptors as a result of Project operation, the FIS/MND fails to compare the excess health risk to the SCAQMD's specific numeric threshold of 10 in one million.[7] Thus, the FIS/MND cannot conclude less than significant health risk impacts resulting from Project operation without quantifying emissions to compare to the proper threshold.

Screening-Level Analysis Demonstrates Significant Impacts

In an effort to demonstrate the potential health risk posed by Project operation to nearby, existing sensitive receptors utilizing a site-specific emissions estimates, we prepared a simple screening-level HRA. The results of our assessment as described below, demonstrate that the proposed Project may result in a significant impact not previously identified or addressed in the IS/MND.

In order to conduct our screening-level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.[8] The model replaced SCREEN3, and AERSCREEN is included in the OEHHA[9] and the California Air Pollution Control Officers Associated ("CAPCOA")[10] guidance as the appropriate air dispersion model for Level 2 health risk screening assessments ("HRSAs"). A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

We prepared a preliminary HRA to quantify the health risk impact posed to residential sensitive receptors by Project operation using the annual PM_{10} exhaust estimates from SWAPE's updated CalEEMod output files. Consistent with recommendations set forth by OEHHA, we assumed residential exposure begins during the third trimester stage of life. As the proposed Project does not include the construction of any additional floor area, we assumed that the sensitive receptor would be exposed to the Project's operational DPM for the total residential duration of 30 years. SWAPE's updated operational CalEEMod emissions indicate that operational activities will generate 632 pounds of DPM per year throughout operation. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project operation, we calculated an average DPM emission rate by the following equation:

$$Emission\ Rate\ \left(\frac{grams}{second}\right) = \frac{632\ lbs}{365\ days} \times \frac{453.6\ grams}{lbs} \times \frac{1\ day}{24\ hours} \times \frac{1\ hour}{3{,}600\ seconds} = \mathbf{0.00909\ g/s}$$

[7] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[8] U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model, http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf
[9] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf
[10] CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

Using this equation, we estimated an operational emission rate of 0.00909 g/s. Operational activity was simulated as a 1.24-acre rectangular area source in AERSCREEN with dimensions of 88 by 57 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.[11] According to the IS/MND, the nearest sensitive receptors are located approximately 1,000 feet, or 305 meters, from the Project boundary (p. 19). Thus, the single-hour concentration estimated by AERSCREEN for Project operation is approximately 2.406 $\mu g/m^3$ DPM at approximately 300 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.2406 $\mu g/m^3$ for Project operation at the nearest sensitive receptor.

We calculated the excess cancer risk to the nearest sensitive receptor using applicable HRA methodologies prescribed by OEHHA. Because the Project would not include the construction of any additional floor area, the annualized average concentration for Project operation was used for the entire 30-year exposure period, including the entire third trimester of pregnancy (0.25 years), infantile stage of life (0 – 2 years), child stage of life (2 – 16 years), and adult stage of life (16 – 30 years).

Consistent with OEHHA, as recommended by the SCAQMD, BAAQMD, and SJVAPCD guidance, we used Age Sensitivity Factors ("ASF") to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.[12, 13, 14] According to this guidance, the quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant) as well as multiplied by a factor of three during the child stage of life (2 – 16 years). We also included the quantified cancer risk without adjusting for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution in accordance with older OEHHA guidance from 2003. This

[11] "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised." EPA, 1992, *available at*: http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf; *see also* "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 4-36.

[12] "Draft Environmental Impact Report (DEIR) for the Proposed The Exchange (SCH No. 2018071058)." SCAQMD, March 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/march/RVC190115-03.pdf?sfvrsn=8, p. 4.

[13] "California Environmental Quality Act Air Quality Guidelines." BAAQMD, May 2017, *available at:* http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, p. 56; see also "Recommended Methods for Screening and Modeling Local Risks and Hazards." BAAQMD, May 2011, *available at:* http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx, p. 65, 86.

[14] "Update to District's Risk Management Policy to Address OEHHA's Revised Risk Assessment Guidance Document." SJVAPCD, May 2015, *available at:* https://www.valleyair.org/busind/pto/staff-report-5-28-15.pdf, p. 8, 20, 24.

guidance utilizes a less health protective scenario than what is currently recommended by SCAQMD, the air quality district with jurisdiction over the City, and several other air districts in the state. Furthermore, in accordance with the guidance set forth by OEHHA, we used the 95th percentile breathing rates for infants.[15] Finally, according to SCAQMD guidance, we used a Fraction of Time At Home ("FAH") Value of 1 for the 3rd trimester and infant receptors.[16] We used a cancer potency factor of 1.1 $(mg/kg\text{-}day)^{-1}$ and an averaging time of 25,550 days. The results of our calculations are shown below.

The Closest Exposed Individual at an Existing Residential Receptor

Activity	Duration (years)	Concentration (ug/m3)	Breathing Rate (L/kg-day)	Cancer Risk without ASFs*	ASF	Cancer Risk with ASFs*
Operation	0.25	0.2406	361	3.3E-07	10	3.3E-06
3rd Trimester Duration	***0.25***			***3.3E-07***	***3rd Trimester Exposure***	***3.3E-06***
Operation	2.00	0.2406	1090	7.9E-06	10	7.9E-05
Infant Exposure Duration	***2.00***			***7.9E-06***	***Infant Exposure***	***7.9E-05***
Operation	14.00	0.2406	572	2.9E-05	3	8.7E-05
Child Exposure Duration	***14.00***			***2.9E-05***	***Child Exposure***	***8.7E-05***
Operation	14.00	0.2406	261	9.7E-06	1	9.7E-06
Adult Exposure Duration	***14.00***			***9.7E-06***	***Adult Exposure***	***9.7E-06***
Lifetime Exposure Duration	**30.00**			**4.7E-05**	**Lifetime Exposure**	**1.8E-04**

* We, along with CARB and SCAQMD, recommend using the more updated and health protective 2015 OEHHA guidance, which includes ASFs.

As demonstrated in the table above, the excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the nearest sensitive receptor, located approximately 300 meters away, over the course of Project operation, utilizing age sensitivity factors, are approximately 9.7, 87, 79, and 3.3 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), utilizing age sensitivity factors, is approximately 180 in one million. The infant, child, and lifetime cancer

[15] "Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act," July 2018, *available at:* http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588supplementalguidelines.pdf, p. 16.
"Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf
[16] "Risk Assessment Procedures for Rules 1401, 1401.1, and 212." SCAQMD, August 2017, *available at:* http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

risks all exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the IS/MND or FIS/MND. Utilizing age sensitivity factors is the most conservative, health-protective analysis according to the most recent guidance by OEHHA and reflects recommendations from the air district. Results without age sensitivity factors are presented in the table above, although we **do not** recommend utilizing these values for health risk analysis. Regardless, the excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the nearest sensitive receptor located approximately 300 meters away, over the course of Project operation, without age sensitivity factors, are approximately 9.7, 29, 7.9, and 0.33 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), without age sensitivity factors, is approximately 47 in one million. The child and lifetime cancer risks, without age sensitivity factors, exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the IS/MND or FIS/MND. While we recommend the use of age sensitivity factors, health risk impacts exceed the SCAQMD threshold regardless.

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection. [17] The purpose of the screening-level operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. Our screening-level HRA demonstrates that operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. Therefore, since our screening-level HRA indicates a potentially significant impact, the City should prepare a Project-specific EIR with an HRA which makes a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors.

Greenhouse Gas

Failure to Evaluate Greenhouse Gas Impacts

The IS/MND and FIS/MND fail to quantify the Project's potential greenhouse gas ("GHG") impacts whatsoever. According to the IS/MND:

> "The proposed project, will allow increased CDI, greenwaste and organics processing within the project site and assist in the City's waste diversion objectives which will have a beneficial impact with respect to energy conservation and GHG reduction. Finally, *the proposed project's operational emissions*, and the use of natural gas-powered collection and processing vehicles, *will result in GHG levels below those considered by the SCAQMD to represent a significant impact*. As a result, the impacts related to additional greenhouse gas emissions will be less than significant" (p. 38).

As you can see in the excerpt above, the IS/MND concludes the Project's GHG emissions would not exceed the SCAQMD thresholds of significance, without quantifying the Project's GHG emissions to

[17] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 1-5

compare to the proper threshold. However, the IS/MND and FIS/MND's analyses of the Project's GHG emissions, as well as the subsequent less-than-significant GHG impact conclusion, are incorrect for two reasons.

First, by failing to evaluate the Project's potential GHG emissions, the Project is inconsistent with CEQA. Specifically, according to CEQA Guidelines § 15064.4(a):

> "A lead agency should make a good-faith effort, based on available information, to *describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project*" (emphasis added).[18]

As you can see in the excerpt above, lead agencies are obligated under CEQA to evaluate the potential GHG emissions resulting from a proposed project. Here, however, the IS/MND and FIS/MND fail to provide any quantitative analysis of the Project's GHG emissions. As such, we recommend that an EIR be prepared to adequately assess and mitigate the potential GHG impacts that the project may have on the surrounding environment.

Second, the Project's emissions, as modeled by SWAPE using project-specific information available in the IS/MND and FIS/MND, indicate a potentially significant impact when applying the relevant SCAQMD efficiency threshold of 3.0 metric tons of carbon dioxide equivalents per service population per year ("MT CO_2e/SP/year") for the year 2035.[19] Specifically, SWAPE's CalEEMod output files disclose approximately 3,189.86 MT CO_2e/year of annual operational emissions (sum of area, energy, mobile, off-road, waste, and water-related emissions). Furthermore, according to CAPCOA's *CEQA & Climate Change* report, service population is defined as "the sum of the number of residents and the number of jobs supported by the project."[20] However, the FIS/MND fails to provide the estimated number of jobs supported by the Project. As such, we estimated the proposed Project's service population based on SCAG's *Employment Density Study Summary Report*. According to SCAG's *Employment Density Study Summary Report*, the average Square Feet/Employee ("SF/Employee") value for "Heavy Manufactoring" in Los Angeles County is 602 SF/Employee.[21] As such, we estimate that the Project would create approximately 90 new employees.[22] As the Project does not include any residential land uses, we estimate a service population of approximately 90 people.[23] Dividing the Project's GHG emissions,

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[18] "CEQA and Climate Change." Governor's Office of Planning and Research ("OPR"), *available at:* https://opr.ca.gov/ceqa/climate-change.html.
[19] "Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15." SCAQMD, September 2010, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf, p. 2.
[20] CAPCOA (Jan. 2008) CEQA & Climate Change, p. 71-72, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf.
[21] "EMPLOYMENT DENSITY STUDY SUMMARY REPORT." Southern California Association of Governments ("SCAG"), October 2001, *available at:* http://www.mwcog.org/file.aspx?A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D, p. 18, Table 4B.
[22] Calculated: (54,000-SF) / (602 SF/employee) = 90 employees.
[23] Calculated: 90 employees + 0 residents = 90 people.

estimated by SWAPE's updated CalEEMod model, by a service population value of 90 people, we find that the Project would emit approximately 35.4 MT CO_2e/SP/year (see table below).[24]

SWAPE Service Population Efficiency	
Project Phase	**Proposed Project (MT CO_2e/year)**
Area	0.00
Energy	386.99
Mobile	1,651.89
Off-road	1,009.55
Waste	33.67
Water	107.74
Total	**3,189.86**
Service Population	90.00
Service Population Efficiency	**35.4**
Threshold	3
Consistent?	***No***

When we compare the Project's per service population GHG emissions to the SCAQMD 2035 efficiency target of 3.0 MT CO_2e/SP/year, we find that the Project would result in a significant GHG impact not previously identified or addressed by the IS/MND or FIS/MND. According to CEQA Guidelines § 15064.4(b), if there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, a full CEQA analysis must be prepared for the project. Therefore, a Project-specific EIR should be prepared and recirculated for the Project, and mitigation should be implemented where necessary, per CEQA Guidelines.

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project's air quality, health risk, and GHG emissions may result in significant impacts and may mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*.[25] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

[24] Calculated: (3,189.86 MT CO_2e/year) / (90 service population) = (35.4 MT CO_2e/SP/year).
[25] http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*[26]
Measures – Energy
Building Energy Use
Exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code)
Install Programmable Thermostat Timers
Obtain Third-party HVAC Commissioning and Verification of Energy Savings
Install Energy Efficient Appliances
Install Energy Efficient Boilers
Lighting
Limit Outdoor Lighting Requirements
Alternative Energy Generation
Establish Onsite Renewable or Carbon-Neutral Energy Systems
Establish Onsite Renewable Energy System – Solar Power
Establish Onsite Renewable Energy System – Wind Power
Measures – Transportation
Land Use/Location
Increase Density
Increase Location Efficiency
Increase Destination Accessibility
Increase Transit Accessibility
Orient Project Toward Non-Auto Corridor
Locate Project near Bike Path/Bike Lane
Neighborhood/Site Enhancements
Provide Pedestrian Network Improvements, such as: • Compact, mixed-use communities • Interconnected street network • Narrower roadways and shorter block lengths • Sidewalks • Accessibility to transit and transit shelters • Traffic calming measures and street trees • Parks and public spaces • Minimize pedestrian barriers
Provide Traffic Calming Measures, such as: • Marked crosswalks • Count-down signal timers • Curb extensions

[26] "Quantifying Greenhouse Gas Mitigation Measures." California Air Pollution Control Officers Association (CAPCOA), August 2010, *available at:* http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, p.

• Speed tables • Raised crosswalks • Raised intersections • Median islands • Tight corner radii • Roundabouts or mini-circles • On-street parking • Planter strips with trees • Chicanes/chokers
Implement a Neighborhood Electric Vehicle (NEV) Network.
Incorporate Bike Lane Street Design (on-site)
Provide Bike Parking in Non-Residential Projects
Provide Electric Vehicle Parking
Dedicate Land for Bike Trails
Parking Policy/Pricing
Limit Parking Supply through: • Elimination (or reduction) of minimum parking requirements • Creation of maximum parking requirements • Provision of shared parking
Unbundle Parking Costs from Property Cost
Implement Market Price Public Parking (On-Street)
Require Residential Area Parking Permits
Commute Trip Reduction Programs
Implement Commute Trip Reduction (CTR) Program – Voluntary • Carpooling encouragement • Ride-matching assistance • Preferential carpool parking • Flexible work schedules for carpools • Half time transportation coordinator • Vanpool assistance • Bicycle end-trip facilities (parking, showers and lockers) • New employee orientation of trip reduction and alternative mode options • Event promotions and publications • Flexible work schedule for employees • Transit subsidies • Parking cash-out or priced parking • Shuttles • Emergency ride home
Implement Commute Trip Reduction (CTR) Program – Required Implementation/Monitoring • Established performance standards (e.g. trip reduction requirements) • Required implementation • Regular monitoring and reporting

Provide Ride-Sharing Programs • Designate a certain percentage of parking spaces for ride sharing vehicles • Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles • Providing a web site or messaging board for coordinating rides • Permanent transportation management association membership and funding requirement.
Implement Subsidized or Discounted Transit Program
Provide Ent of Trip Facilities, including: • Showers • Secure bicycle lockers • Changing spaces
Encourage Telecommuting and Alternative Work Schedules, such as: • Staggered starting times • Flexible schedules • Compressed work weeks
Implement Commute Trip Reduction Marketing, such as: • New employee orientation of trip reduction and alternative mode options • Event promotions • Publications
Implement Preferential Parking Permit Program
Implement Car-Sharing Program
Implement School Pool Program
Provide Employer-Sponsored Vanpool/Shuttle
Implement Bike-Sharing Programs
Price Workplace Parking, such as: • Explicitly charging for parking for its employees; • Implementing above market rate pricing; • Validating parking only for invited guests; • Not providing employee parking and transportation allowances; and • Educating employees about available alternatives.
Implement Employee Parking “Cash-Out”
Transit System Improvements
Transit System Improvements, including: • Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route. • Frequent, high-capacity service • High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride. • Pre-paid fare collection to minimize boarding delays. • Integrated fare systems, allowing free or discounted transfers between routes and modes. • Convenient user information and marketing programs. • High quality bus stations with Transit Oriented Development in nearby areas.

• Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.
Implement Transit Access Improvements, such as: • Sidewalk/crosswalk safety enhancements • Bus shelter improvements
Expand Transit Network
Increase Transit Service Frequency/Speed
Provide Bike Parking Near Transit
Provide Local Shuttles
Road Pricing/Management
Implement Area or Cordon Pricing
Improve Traffic Flow, such as: • Signalization improvements to reduce delay; • Incident management to increase response time to breakdowns and collisions; • Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and • Speed management to reduce high free-flow speeds.
Required Project Contributions to Transportation Infrastructure Improvement Projects
Install Park-and-Ride Lots
Vehicles
Electrify Loading Docs and/or Require Idling-Reduction Systems
Utilize Alternative Fueled Vehicles, such as: • Biodiesel (B20) • Liquefied Natural Gas (LNG) • Compressed Natural Gas (CNG)
Utilize Electric or Hybrid Vehicles
Measures – Water
Water Supply
Use Reclaimed Water
Use Gray Water
Use Locally Sourced Water Supply
Water Use
Install Low-Flow Water Fixtures
Adopt a Water Conservation strategy
Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as: • Reducing lawn sizes; • Planting vegetation with minimal water needs, such as native species;

• Choosing vegetation appropriate for the climate of the project site; • Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water.
Use Water-Efficient Landscape Irrigation Systems (“Smart” irrigation control systems)
Reduce Turf in Landscapes and Lawns
Plant Native or Drought-Resistant Trees and Vegetation
Measures – Area Landscaping
Landscaping Equipment
Prohibit Gas Powered Landscape Equipment
Implement Lawnmower Exchange Program
Electric Yard Equipment Compatibility
Measures – Solid Waste
Solid Waste
Institute Recycling and Composting Services
Measures – Vegetation
Vegetation
Urban Tree Planting
Create New Vegetated Open Space
Measures – Miscellaneous
Miscellaneous
Establish a Carbon Sequestration Project, such as: • Geologic sequestration or carbon capture and storage techniques, in which CO_2 from point sources is captured and injected underground; • Terrestrial sequestration in which ecosystems are established or preserved to serve as CO_2 sinks; • Novel techniques involving advanced chemical or biological pathways; or • Technologies yet to be discovered.
Establish Off-Site Mitigation
Use Local and Sustainable Building Materials
Require best Management Practices in Agriculture and Animal Operations
Require Environmentally Responsible Purchasing, such as: • Purchasing products with sustainable packaging; • Purchasing post-consumer recycled copier paper, paper towels, and stationary; • Purchasing and stocking communal kitchens with reusable dishes and utensils; • Choosing sustainable cleaning supplies; • Leasing equipment from manufacturers who will recycle the components at their end of life; • Choosing ENERGY STAR appliances and Water Sense-certified water fixtures; • Choosing electronic appliances with built in sleep-mode timers; • Purchasing ‘green power’ (e.g. electricity generated from renewable or hydropower) from the utility; and • Choosing locally-made and distributed products.

Implement an Innovative Strategy for GHG Mitigation
Measures – General Plans
General Plans
Fund Incentives for Energy Efficiency, such as: • Retrofitting or designing new buildings, parking lots, streets, and public areas with energy-efficient lighting; • Retrofitting or designing new buildings with low-flow water fixtures and high-efficiency appliances; • Retrofitting or purchasing new low-emissions equipment; • Purchasing electric or hybrid vehicles; • Investing in renewable energy systems
Establish a Local Farmer's Market
Establish Community Gardens
Plant Urban Shade Trees
Implement Strategies to Reduce Urban Heat-Island Effect, such as: • Planting urban shade trees; • Installing reflective roofs; and • Using light-colored or high-albedo pavements and surfaces.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project operation. An EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

APPENDIX G

ENVIRONMENTAL PERMITTING SPECIALISTS SCREENING LEVEL HEALTH RISK ASSESSMENT

TECHNICAL MEMORANDUM

To: Larry Miner
Clements Environmental

Date: August 05, 2021

From: Ray Kapahi RK
Tel: 916-687-8352
E-Mail: ray.kapahi@gmail.com

Subject: Results of Screening Level Health Risk Analysis in Support of Draft Initial Study for Direct Disposal Large Volume Solid Waste Transfer/Processing Facility, Los Angeles, CA

INTRODUCTION AND SUMMARY

Environmental Permitting Specialists (EPS) has completed a screening level health risk assessment (HRA) in support of the proposed solid waste transfer station and processing facility (Facility) in Los Angeles. The Facility is located at 3720 Noakes Street in Los Angeles. This is an industrial area surrounded by other industrial buildings and warehouses (Figure 1). The Facility would process 500 tons per day of solid waste. The purpose of preparing the HRA is to determine if operations at the Facility would lead to significant public health risks.

"Screening Level" health risk analysis refers to a simplified, conservative estimate of potential health risks. The analysis yields a "Risk Score" that can be used to characterize risks as being high, medium or low. A risk score below 1 indicates low risk. A score above 10 indicated high risk. If significant public health risks are projected, then a refined HRA is prepared.

A review of the July 2019 Draft Initial Study /Mitigated Negative Declaration (IS/MND) indicated that the main source of toxic air contaminants (TACs) is heavy duty diesel heavy duty (HD) trucks. HD trucks release diesel particulate matter (DPM) that is regulated as a carcinogen. DPM is not regulated for any short-term (acute) non-cancer health effects. The results of the screening level HRA indicate that if the Facility generates an additional 109 HD trucks per day, then the maximum cancer risk score would be 0.46 within 100 meters (328 feet) of the project

site. The cancer risk score at the nearest homes located 1,075 feet to the North is estimated to be 0.02. These results indicate that exposure to toxic emissions from the Facility would not lead to significant public health risks.

SCOPE AND METHODOLOGY

The screening level HRS consists of two main steps:

1) Quantify the emission rates of toxic air contaminants
2) Calculated screening level risk based on conservative exposure to the identified TAC.

Estimate of Emissions

A review of the IS/MND (July 2019) indicated that the main source of TACs is vehicular traffic (cars, light and heavy duty trucks). There are no fuel combustion sources or emergency electric generators. EPS reviewed the daily traffic volumes expected for the Facility (provided in Attachment 1) and conservatively estimated daily HD truck volume to equal 109 trucks per day. EPS expects the actual volume of HD diesel trucks to be lower as many trucks are being converted to CNG.

TAC emissions from gasoline fuelled autos and light trucks is expected to be much lower as the toxicity of TACs such as benzene, 1,3 butadiene is an order of magnitude lower than DPM (ARB /OEHHA 2020). As a result, the contribution from automobiles and light duty trucks to the overall health risk is expected to be negligible.

DPM emissions from HD trucks occur while the vehicles are idling inside the yard as well as offsite emissions as the trucks approach the facility. For the current analysis, EPS assumed an idle time of 10 minutes per truck while in the yard. Off-site emissions within ¼ mile were also calculated and the total of on-site idle and off-site emissions was used to determine the screening level cancer risk.

The EMFAC 2021 emissions model (ARB 2021) was used to calculate emissions of fine particulate (PM-2.5) from HD trucks idling and truck travel. PM-2.5 serves as a surrogate for DPM. This model provides off-site emissions in terms of grams per mile. On-site (truck idle) emissions are calculated in terms of pounds per 8-hour day. It was estimated that 0.895 pounds of PM 2.5 would be released annually from 109 HD diesel trucks. See Table 1 for a summary of the calculations and excerpts of the EMFAC 2021 emissions model.

Calculate Screening Level Risk

EPS used the toxicity and exposure data as summarized in the Air Toxics "Hot Spots" Information and Assessment Act of 1987 Facility Prioritization methodology (AB-2588 2021) to calculate the cancer risk score for various distances from the Facility. This procedure uses the unit risk factor for DPM along with a conservative estimate of lifetime exposure to calculate the risk score. The detailed calculations appear in Attachment 2.

RESULTS

The screening level cancer risk scores are shown below. The risk score at the nearest home is highlighted.

Receptor Proximity & Proximity Factors (Meters)		Emissions Potency Method			Dispersion Adjustment Method		
		Carc Scores	Non-Carc Scores	Facility Ranking	Carc Scores	Non-Carc Scores	Facility Ranking
0< R<100	1.000	0.46	0.01	Low Priority	0.45108	0.01074	Low Priority
100≤R<250	0.250	0.11	0.00	Low Priority	0.11277	0.00269	Low Priority
250≤R<500	0.040	0.02	0.00	Low Priority	0.01804	0.00043	Low Priority
500≤R<1000	0.011	0.01	0.00	Low Priority	0.00496	0.00012	Low Priority
1000≤R<1500	0.003	0.00	0.00	Low Priority	0.00135	0.00003	Low Priority
1500≤R<2000	0.002	0.00	0.00	Low Priority	0.00090	0.00002	Low Priority
2000<R	0.001	0.00	0.00	Low Priority	0.00045	0.00001	Low Priority

A cancer risk score below 1 indicates a low level of public risk. Overall, the analysis shows that the operation of the Facility would not lead to excessive public health risk.

References

AB-2588 2021 – “Toxics Hot-Spots” Prioritization: Information available at: https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-prioritization

ARB/OEHHA 2020: “Consolidated Table of OEHHA / CARB Approved Risk Assessment Health Values”. Available at: https://ww2.arb.ca.gov/resources/documents/consolidated-table-oehha-carb-approved-risk-assessment-health-values

ARB 2021: Emission Factor Model. Information available at: https://arb.ca.gov/emfac/

Figure 1


Nearest Homes
1,075 feet from
Project Site
VENATOR AMERICAS
Michael Jacksons
[Thriller] MV shooting...
Los Palos St
Morenita
N&M Body Shop
S Alma Ave
Union Pacific Ave
Mary's Stand!
Temp closed re open...
Takeout
CR Creative Services
Calada St
Cajona St
Los Palos St
S Indiana St
S Hicks Ave
Antaky Quilting
Lineage Logistics
99 Only
Distribution Center
Zen-noh Wagyu
Takeout
3720 Noakes St, Los
Angeles, CA 90023
Dorsett & Jackson
Noakes St
Taylor Farms
E Washington Blvd

Attachment 1

Traffic Data

Project Trip Generation Estimates

Land Use/Vehicle Type	Daily			AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
EXISTING CDI FACILITY (174 TPD)									
Employee Vehicles	26	26	52	0	0	0	0	0	0
Roll-Off Trucks	30	30	60	2	2	4	3	2	5
Self-Haul Vehicles	24	24	48	2	2	4	1	1	2
Transfer Trucks	8	8	16	1	1	2	0	0	0
Total	**88**	**88**	**176**	**5**	**5**	**10**	**4**	**3**	**7**
PROPOSED FACILITY EXPANSION (326 TPD)									
Employee Vehicles	28	28	56	0	0	0	0	0	0
Roll-Off Trucks	58	58	116	3	3	6	3	3	6
Self-Haul Vehicles	36	36	72	3	3	6	2	2	4
Transfer Trucks	15	15	30	1	1	2	0	0	0
Total	**137**	**137**	**274**	**7**	**7**	**14**	**5**	**5**	**10**
TOTAL SITE TRIP GENERATION (Proposed + Existing)									
Employee Vehicles	54	54	108	0	0	0	0	0	0
Roll-Off Trucks	88	88	176	5	5	10	6	5	11
Self-Haul Vehicles	60	60	120	5	5	10	3	3	6
Transfer Trucks	23	23	46	0	0	0	0	0	0
Total	**225**	**225**	**450**	**10**	**10**	**20**	**9**	**8**	**17**

Note:

Trip generation estimates provided by Direct Disposal, and is based on a typical operation.

Employee vehicles are typically passenger cars (gas) or light duty pick up trucks (gas).

Roll-Off Trucks are a mix of diesel and CNG

Self-Haul Vehicles can include light duty gas pick up trucks and heavy duty diesel pick up trucks

Transfer trucks are semi-tractor trailers (diesel).

Attachment 2

Emission Calculations
Detailed Cancer Risk Score Calculation

Calculation of Diesel Particulate Matter Emissions from On-Site Truck Idle and Off-Site Movement

BASIS		
Daily Volume of HD Diesel Trucks	109	trucks/day

Emissions from Idling		
Idle time per truck	10	min/truck
Idle time all trucks	1,090	min/day
	18	hrs/day
Emission factor	1.23E-02	grams/hr per truck
Ref: EMFAC 2021 for SCAQMD Region For CY 2021.		
Emissions per day all trucks	2.23E-01	grams/day
	4.91E-04	lbs/day
Annual emissions all trucks	0.1791	lbs/year

Emissions from Truck Movement		
Travel per truck	0.25	mile/truck
Travel Distance All Trucks	27	miles/day
Emission factor	3.27E-02	grams/mile
Ref: EMFAC 2017 for SCAQMD Region For CY 2021.		
Emissions per day all trucks	8.91E-01	grams/day
	1.96E-03	lbs/day
Annual emissions all trucks	0.716	lbs/year

Total Annual Emissions		lbs/yr
Emissions from Truck Idle		0.1791
Emissions from Truck Movement		0.716
	TOTAL	0.895

File: LA Disposal Project Rev 2
Sheet: Emissions

	A	B	C	D	E	F	G	H	I
1	Source: EMFAC2021 (v1.0.1) Emission Rates								
2	Region Type: Statewide								
3	Region: California								
4	Calendar Year: 2021								
5	Season: Annual								
6	Vehicle Classification: EMFAC202x Categories								
7	Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, g/mile for RUNEX, PMBW and								
8									
9	Region	Calendar Y	Vehicle Category	Model Yea	Speed	Fuel	PM2.5_RUNEX	PM2.5_IDLEX	PM2.5_
10	Statewide	2021	T6 Instate Delivery Class 6	Aggregate	Aggregate	Diesel	0.020629872	0.030976412	
11	Statewide	2021	T6 Instate Other Class 4	Aggregate	Aggregate	Diesel	0.039134628	0.095777323	
12	Statewide	2021	T6 Instate Other Class 5	Aggregate	Aggregate	Diesel	0.009249951	0.015402368	
13	Statewide	2021	T6 Instate Other Class 6	Aggregate	Aggregate	Diesel	0.026120169	0.069381343	
14	Statewide	2021	T6 Instate Tractor Class 6	Aggregate	Aggregate	Diesel	0.032696	0.0980916	
15	Statewide	2021	T6 Public Class 4	Aggregate	Aggregate	Diesel	0.030070449	0.058810614	
16	Statewide	2021	T6 Public Class 5	Aggregate	Aggregate	Diesel	0.015908525	0.02899469	
17	Statewide	2021	T6 Public Class 6	Aggregate	Aggregate	Diesel	0.040533659	0.107403922	
18	Statewide	2021	T6 Public Class 7	Aggregate	Aggregate	Diesel	0.045411454	0.133321466	
19	Statewide	2021	T6 Utility Class 5	Aggregate	Aggregate	Diesel	0.005025751	0.002217572	
20	Statewide	2021	T6 Utility Class 6	Aggregate	Aggregate	Diesel	0.005357166	0.002597661	
21	Statewide	2021	T6 Utility Class 7	Aggregate	Aggregate	Diesel	0.004036407	0.002013236	

Name

Air Toxics "Hot Spots" Information and Assessment Act of 1987 Facility Prioritization Scores Prioritization 2.0 SJVAPCD

Applicability	Use this spreadsheet to generate a Prioritization when emission rates of HAPs are known. Entries required in yellow areas, output in grey areas.
Author or updater	R Kapahi
Last Update	August 4, 2021
Facility:	LA Disposal
ID#:	Based on 109 HD Diesel Trucks/day, 365 days/year
Project #:	
Data Entered by:	Ray Kapahi
	EPS Consulting
Location	

Inputs	Operating Hours hr/yr	Release Height (m)
	2500	5

Receptor Proximity & Proximity Factors (Meters)		**Emissions Potency Method** Carc Scores	Non-Carc Scores	Facility Ranking	**Dispersion Adjustment Method** Carc Scores	Non-Carc Scores	Facility Ranking		
0< R<100	1.000	0.46	0.01	**Low Priority**	0.45108	0.01074	**Low Priority**		**Low Priority**
100≤R<250	0.250	0.11	0.00	**Low Priority**	0.11277	0.00269	**Low Priority**		**Low Priority**
250≤R<500	0.040	0.02	0.00	**Low Priority**	0.01804	0.00043	**Low Priority**		**Low Priority**
500≤R<1000	0.011	0.01	0.00	**Low Priority**	0.00496	0.00012	**Low Priority**		**Low Priority**
1000≤R<1500	0.003	0.00	0.00	**Low Priority**	0.00135	0.00003	**Low Priority**		**Low Priority**
1500≤R<2000	0.002	0.00	0.00	**Low Priority**	0.00090	0.00002	**Low Priority**		**Low Priority**

	2000<R 0.001	0.00	0.00	**Low Priority**	0.00045	0.00001	**Low Priority**		**Low Priority**	
Height Adjustment		<100m	<250m	<500m	<1000m	<1500m	<2000m	>=2000m		
<20m	60	1	0.25	0.04	0.011	0.003	0.002	0.001		
20m<= <45m	9	1	0.85	0.22	0.064	0.018	0.009	0.006		
=>45m	1	1	1	0.9	0.4	0.13	0.066	0.042		

CAS#	Substance	Annual Emissions	Maximum Hourly	Average Hourly	Disp Adj Method Carc	EP Method Carc	EP Method Chronic	EP Method Acute	EP Max of Chronic and Acute	Disp Adj Method Chronic
79345	1,1,2,2-Tetrachloroethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
79005	1,1,2-Trichloroethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75343	1,1-Dichloroethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0	1,2,3,4,5,6,78-OctaD			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0	1,2,3,4,5,6,78-OctaF			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
39001020	1,2,3,4,6,7,8,9-Octachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3268879	1,2,3,4,6,7,8,9-Octachlorodibenzo-P-dioxin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
67562394	1,2,3,4,6,7,8-Heptachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
35822469	1,2,3,4,6,7,8-Heptachlorodibenzo-P-dioxin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
55673897	1,2,3,4,7,8,9-Heptachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
70648269	1,2,3,4,7,8-Hexachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
39227286	1,2,3,4,7,8-Hexachlorodibenzo-P-dioxin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57117449	1,2,3,6,7,8-Hexachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57653857	1,2,3,6,7,8-Hexachlorodibenzo-P-dioxin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
72918219	1,2,3,7,8,9-Hexachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
19408743	1,2,3,7,8,9-Hexachlorodibenzo-P-dioxin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57117416	1,2,3,7,8-Pentachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
40321764	1,2,3,7,8-Pentachlorodibenzo-P-dioxin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
96128	1,2-Dibromo-3-chloropropane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

78875	1,2-Dichloropropane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
122667	1,2-Diphenylhydrazine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
106887	1,2-Epoxybutane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
106990	1,3-Butadiene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
542756	1,3-Dichloropropene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1120714	1,3-Propane sultone			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
123911	1,4-Dioxane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
42397648	1,6-Dinitropyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
42397659	1,8-Dinitropyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
5522430	1-Nitropyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
39635319	2,3,3',4,4',5,5'-HEPTACHLORBIPHENYL (PCB 189)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
38380084	2,3,3',4,4',5-HEXACHLOROBIPHENYL (PCB 156)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
69782907	2,3,3',4,4',5'-HEXACHLOROBIPHENYL (PCB 157)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
32598144	2,3,3',4,4'-Pentachlorobiphenyl {PCB 105}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
52663726	2,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 167)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
74472370	2,3,4,4',5-PENTACHLOBIPHENYL (PCB114)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
31508006	2,3',4,4',5-PENTACHLOROBIPHENYL (PCB 118)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
65510443	2,3',4,4',5'-PENTACHOROBIPHENYL (PCB 123)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
60851345	2,3,4,6,7,8-Hexachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

57117314	2,3,4,7,8-Pentachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
51207319	2,3,7,8-Tetrachlorodibenzofuran			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1746016	2,3,7,8-Tetrachlorodibenzo-P-Dioxin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
88062	2,4,6-Trichlorophenol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
615054	2,4-Diaminoanisole			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
95807	2,4-Diaminotoluene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
121142	2,4-Dinitrotoluene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
53963	2-Acetylaminofluorene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
117793	2-Aminoanthraquinone			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
607578	2-Nitrofluorene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
32774166	3,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 169)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57465288	3,3',4,4',5-PENTACHLOROBIPHENYL (PCB 126)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
32598133	3,3',4,4'-TETRACHLORBIPHENYL (PCB77)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
91941	3,3'-Dichlorobenzidine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
70362504	3,4,4',5-TETRACHLOROBIPHENYL (PCB 81)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
56495	3-Methylcholanthrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
101144	4,4'-Methylene bis(2 Chloroaniline) (MOCA)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
101779	4,4'-Methylenedianiline			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
92671	4-Aminobiphenyl			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
95830	4-Chloro-o-phenylenediamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
60117	4-Dimethylaminoazobenzene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57835924	4-Nitropyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3697243	5-Methylchrysene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

602879	5-Nitroacenaphthene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7496028	6-Nitrochrysene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57976	7,12-Dimethylbenz[a]anthracene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
194592	7H-Dibenzo[c,g]carbazole			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75070	Acetaldehyde			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
60355	Acetamide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
107028	Acrolein			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
79061	Acrylamide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
79107	Acrylic acid			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
107131	Acrylonitrile			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
107051	Allyl chloride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
319846	alpha-Hexachlorocyclohexane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
61825	Amitrole			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7664417	Ammonia			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
62533	Aniline			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7440382	Arsenic			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1016	Arsenic compounds (inorganic)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7784421	Arsine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1332214	Asbestos			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
10294403	Barium chromate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
56553	Benz[a]anthracene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
71432	Benzene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
92875	Benzidine (and its salts)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1020	Benzidine-based dyes			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
50328	Benzo[a]pyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
205992	Benzo[b]fluoranthene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
205823	Benzo[j]fluoranthene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
207089	Benzo[k]fluoranthene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
100447	Benzyl chloride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7440417	Beryllium			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
319857	beta-Hexachlorocyclohexane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57578	beta-Propiolactone			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
111444	Bis(2-chloroethyl) ether {DCEE}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
542881	Bis(chloromethyl) ether			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7440439	Cadmium			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

13765190	Calcium chromate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2425061	Captafol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
133062	Captan			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75150	Carbon disulfide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
630080	Carbon monoxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
56235	Carbon tetrachloride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57749	Chlordane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108171262	Chlorinated paraffin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7782505	Chlorine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
10049044	Chlorine dioxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108907	Chlorobenzene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
510156	Chlorobenzilate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0	Chlorodifluoromethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
67663	Chloroform			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
107302	Chloromethyl methyl			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
76062	Chloropicrin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1333820	Chromium trioxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
18540299	Chromium, hexavalent			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
218019	Chrysene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1066	Coke oven emissions			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7440508	Copper			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1319773	Cresols (mixtures of) {Cresylic acid}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
135206	Cupferron			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1073	Cyanide compounds			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57125	CYANIDE COMPOUNDS [Inorganic]			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
117817	Di(2-ethylhexyl) phthalate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
226368	Dibenz[a,h]acridine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2263680	Dibenz[a,h]acridine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
53703	Dibenz[a,h]anthracene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
224420	Dibenz[a,j]acridine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
192645	Dibenzo[a,e]pyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
189640	Dibenzo[a,h]pyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
189559	Dibenzo[a,i]pyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
191300	Dibenzo[a,l]pyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

1080	Dibenzofurans (chlorinated) {PCDFs} [Treated as 2378TCDD for HRA]			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0	Dichlorodifluoromethene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
72559	Dichlorodiphenyldichloroethylene {DDE}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
73354	Dichloroethylene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
62737	Dichlorovos {DDVP}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
9901	Diesel engine exhaust, particulate matter (Diesel PM)	8.95E-01		3.58E-04	7.52E-03	4.56E-01	1.07E-02	0.00E+00	1.07E-02	1.79E-04
111422	Diethanolamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
79447	Dimethyl carbamoyl chloride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
68122	Dimethyl formamide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
124403	Dimethylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1086	Dioxins, total, w/o individ. isomers reported {PCDDs} [Treat as 2378TCDD for HRA			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1937377	Direct Black 38			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2602462	Direct Blue 6			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
16071866	Direct Brown 95 (technical grade)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
106898	Epichlorohydrin			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
100414	Ethyl benzene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75003	Ethyl chloride {Chlorethane)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
106934	Ethylene dibromide {EDB}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
107062	Ethylene dichloride {EDC}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
107211	Ethylene glycol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
111762	Ethylene glycol monobutyl ether			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
110805	Ethylene glycol monoethyl ether			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
111159	Ethylene glycol monoethyl ether acetate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
109864	Ethylene glycol monomethyl ether			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

110496	Ethylene glycol monomethyl ether acetate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75218	Ethylene oxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
96457	Ethylene thiourea			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
151564	Ethyleneimine {Aziridine}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1101	Fluorides			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
50000	Formaldehyde			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
111308	Glutaraldehyde			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
76448	Heptachlor			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
118741	Hexachlorobenzene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1120	Hexachlorocyclohexane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
608731	Hexachlorocyclohexanes (mixed or technical grade)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
67721	Hexachloroethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
110543	Hexane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
302012	Hydrazine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7647010	Hydrochloric acid			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
74908	Hydrocyanic acid			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7664393	Hydrogen fluoride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7783075	Hydrogen Selenide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7783075	HYDROGEN SELENIDE			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7783064	Hydrogen sulfide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
193395	Indeno[1,2,3-cd]pyrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
78591	Isophorone			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
67630	Isopropyl alcohol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7439921	Lead			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
301042	Lead acetate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7758976	Lead chromate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1128	Lead compounds (inorganic)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7446277	Lead phosphate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1335326	Lead subacetate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
58899	Lindane {gamma-Hexachlorocyclohexane}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108316	Maleic anhydride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7439965	Manganese			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108394	m-Cresol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7487947	Mercuric chloride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

7439976	Mercury			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
67561	Methanol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
74839	Methyl bromide {Bromomethane}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
71556	Methyl chloroform {1,1,1-Trichloroethane}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
78933	Methyl ethyl ketone			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
624839	Methyl isocyanate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1634044	Methyl tert-butyl ether			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75092	Methylene chloride {Dichloromethane}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
101688	Methylene diphenyl diisocyanate {MDI}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
90948	Michler's ketone			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108383	m-Xylene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
91203	Naphthalene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7440020	Nickel			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
373024	Nickel acetate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3333673	Nickel carbonate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3333393	Nickel carbonate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
13463393	Nickel carbonyl			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
12054487	Nickel hydroxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1313991	Nickel oxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1146	Nickel refinery dust			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
12035722	Nickel subsulfide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1271289	Nickelocene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7697372	Nitric acid			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
139139	Nitrilotriacetic acid			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
10102440	NITROGEN DIOXIDE			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1116547	N-Nitrosodiethanolamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
55185	N-Nitrosodiethylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
62759	N-Nitrosodimethylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
924163	N-Nitrosodi-n-butylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
621647	N-Nitrosodi-n-propylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
86306	N-Nitrosodiphenylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
10595956	N-Nitrosomethylethylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
59892	N-Nitrosomorpholine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

684935	N-Nitroso-N-methylurea			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
100754	N-Nitrosopiperidine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
930552	N-Nitrosopyrrolidine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
90040	o-Anisidine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
95487	o-Cresol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
8014957	OLEUM			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
95534	o-Toluidine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
95476	o-Xylene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
10028156	OZONE			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1151	PAHs, total, w/o individ. components reported [Treated as B(a)P for HRA]			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1336363	PCBs {Polychlorinated biphenyls}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
95692	p-Chloro-o-toluidine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
120718	p-Cresidine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
106445	p-Cresol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
106467	p-Dichlorobenzene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
87865	Pentachlorophenol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
127184	Perchloroethylene {Tetrachloroethene}			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108952	Phenol			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75445	Phosgene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7803512	Phosphine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7664382	Phosphoric acid			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
85449	Phthalic anhydride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
156105	p-Nitrosodiphenylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7758012	Potassium bromate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
115071	Propylene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
107982	Propylene glycol monomethyl ether			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75569	Propylene oxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75569	Propylene oxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
106423	p-Xylene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
50555	Reserpine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7782492	Selenium			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7446346	Selenium sulfide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

1175	Silica, crystalline			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7631869	Silica, crystalline			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
10588019	Sodium dichromate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1310732	Sodium hydroxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7789062	Strontium chromate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
100425	Styrene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
9960	Sulfates			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
9960	SULFATES			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7446095	Sulfur Dioxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7446719	Sulfur Trioxide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7664939	Sulfuric acid			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0	Tetrachlorophenols			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
62555	Thioacetamide			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
62566	Thiourea			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108883	Toluene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1204	Toluene diisocyanate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
26471625	TOLUENE DIISOCYANATE			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
584849	Toluene-2,4-diisocyanate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
91087	Toluene-2,6-diisocyanate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
8001352	Toxaphene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
79016	Trichloroethylene			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0	Trichlororfluormethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0	Trichlorotrifluormethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
121448	Triethylamine			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
51796	Urethane			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7440622	Vanadium (fume or dust)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1314621	VANADIUM PENTOXIDE			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
108054	Vinyl acetate			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75014	Vinyl chloride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
75354	Vinylidene chloride			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1330207	XYLENES (mixed xylenes)			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

APPENDIX H

DRAFT TRANSFER/PROCESSING REPORT

DIRECT DISPOSAL MATERIAL RECOVERY FACILITY AND TRANSFER STATION

TRANSFER/PROCESSING REPORT

Prepared for:

Direct Disposal, Inc.
3720 Noakes St.
Los Angeles, CA. 90023
(323) 262-1604

Prepared by:

Clements Environmental LLC
15230 Burbank Blvd., Suite 103
Sherman Oaks, CA 91411
(818) 267-5100

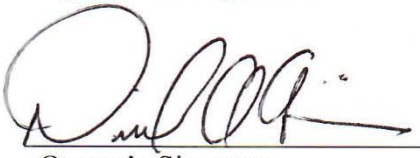
July 2020

OWNER/APPLICANT CERTIFICATION STATEMENT

FOR

DIRECT DISPOSAL
MATERIAL RECOVERY FACILITY
AND TRANSFER STATION

In accordance with California Code of Regulations Title 27, Section 21570(e), the undersigned, as owner/applicant of the Direct Disposal Material Recovery Facility and Transfer Station, and as the applicant for a solid waste permit to operate said facility, hereby attest that all information in the application package, and Transfer Processing Report (TPR), are true and accurate to their best knowledge and belief.

Dan Agajanian		7/15/2020
Applicant's Name (Print)	Applicant's Signature	Date
Dan Agajanian		7/15/2020
Owner's Name (Print)	Owner's Signature	Date

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1.0 FACILITY OVERVIEW

1.1 INTRODUCTION

This Transfer/Processing Report (TPR) has been prepared for, and at the request of, Direct Disposal for their operations at 3720 Noakes Street, in the City of Los Angeles. This TPR has also been prepared in accordance with Title 14, Section 18221.6 of the California Code of Regulations (CCR), which lists the specific requirements for inclusion in a TPR and describes the design and operation of Direct Disposal Material Recovery Facility (MRF) and Transfer Station.

Direct Disposal has operated a construction, demolition and inert (CDI) material processing facility on the property located at 3720 Noakes Street in the City of Los Angeles since July of 2004. The facility was initially permitted as a small volume CDI processing facility (<25 tons per day) and has been operating as a medium volume CDI material processing facility (<175 tons per day) since November of 2008. Direct Disposal is certified by the City of Los Angeles to process construction and demolition (C&D) material and has a diversion rate of over 70 percent.

The Direct Disposal operations include a fully enclosed material recovery facility (MRF) and transfer station building on approximately 1.2-acres (54,136 sq. ft.) of land located at 3720 Noakes Street and a 0.77-acre (33,550 sq. ft.) parcel of land directly across the street at 3719 Noakes Street that is used for parking and storage.

The purpose of this TPR and Solid Waste Facility Permit (SWFP) is to allow Direct Disposal to operate a Large Volume Solid Waste Facility at 3720 Noakes Street and accept up to 500 tons per day of CDI material and municipal solid waste (MSW) for processing and transfer. Of the 500 TPD, no more than 100 TPD of MSW will be accepted for transfer at the facility. No hazardous wastes will be accepted or processed at the facility.

Summary of Facility Information

Name of Facility:	Direct Disposal MRF and Transfer Station
Facility Address:	3720 Noakes Street Los Angeles, CA 90023
Permitted Capacity/Design Capacity:	500 TPD/600 TPD for CDI (1,000 TPD solid waste transfer design capacity)
Land Owner/Operator/Address Where Legal Notice May Be Served [14CCR § 18221.6(a)]	Daniel A. Agajanian Direct Disposal, Inc. 3720 Noakes Street Los Angeles, CA 90023

1.2 SITE LOCATION

The Direct Disposal MRF and Transfer Station is located at 3720 Noakes Street, Los Angeles, CA, 90023, within Los Angeles County. The site is zoned M3-1-CUGU (heavy industrial) by the City of Los Angeles. The site is within Rancho Laguna and, because it was in private ownership prior to California becoming part of the United States is not part of the Township and Range system.

Major roads providing access to the facility include Noakes Street, Calzona Street, Los Palos Street, Indiana Street, and East Olympic Boulevard. Regional access to the site is available from the 5, 60 and 710 Freeways. **Figure 1**, Vicinity Map, shows the general location of the facility.

Figure 2 shows the zoning of all properties within a 1,000-foot radius of the Direct Disposal transfer/processing facility. All properties within the City of Los Angeles are zoned M3-1, heavy industrial, except for one property that is zoned MR1-1, restricted light industrial. All properties within a 1,000-foot radius located in the City of Vernon are zoned industrial with a truck and freight overlay.

Surrounding properties include a mix of heavy industrial and warehouse uses. A mill, garment manufacturing facility, and a warehouse are located to north of the site across Noakes Street, a Union Pacific Railway freight yard is located to the south within the City of Vernon, a printing facility occupies the property to the east, and a wholesale distribution warehouse is located to the west.

1.3 SITE PLAN DESCRIPTION

1.3.1 Site Plan (Schematic Drawing)

The Direct Disposal facility includes a 12,160 square foot material recovery facility (MRF) and transfer station building with mechanical processing equipment and an elevated sort line, a 40-foot long truck scale, modular scale-house/office, outdoor storage and surface parking on slightly approximately 1.2 acres (54,136 sq. ft.) of land located at 3720 Noakes Street. The parcel of land at 3719 Noakes Street is approximately 35,550 sq. ft. in area and is used for storage and parking. **Figure 3**, Overall Site Plan and **Figure 4**, Site Plan show the location of the building and associated improvements on the property.

1.3.2 Service Area

The facility services the City of Los Angeles, other local cities, and County Unincorporated areas.

FIGURE 1 - VICINITY MAP

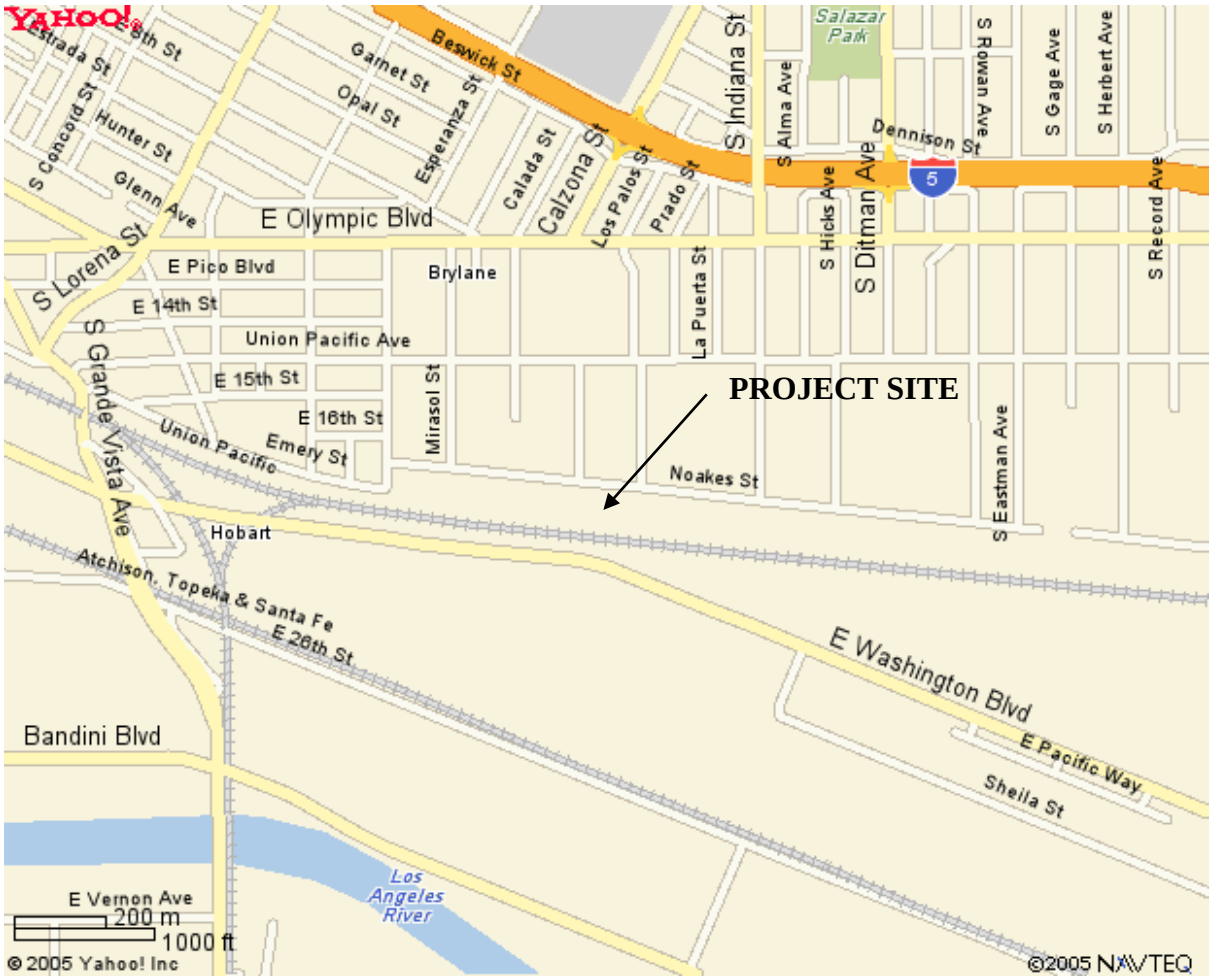


FIGURE 2 - 1,000 FOOT RADIUS MAP

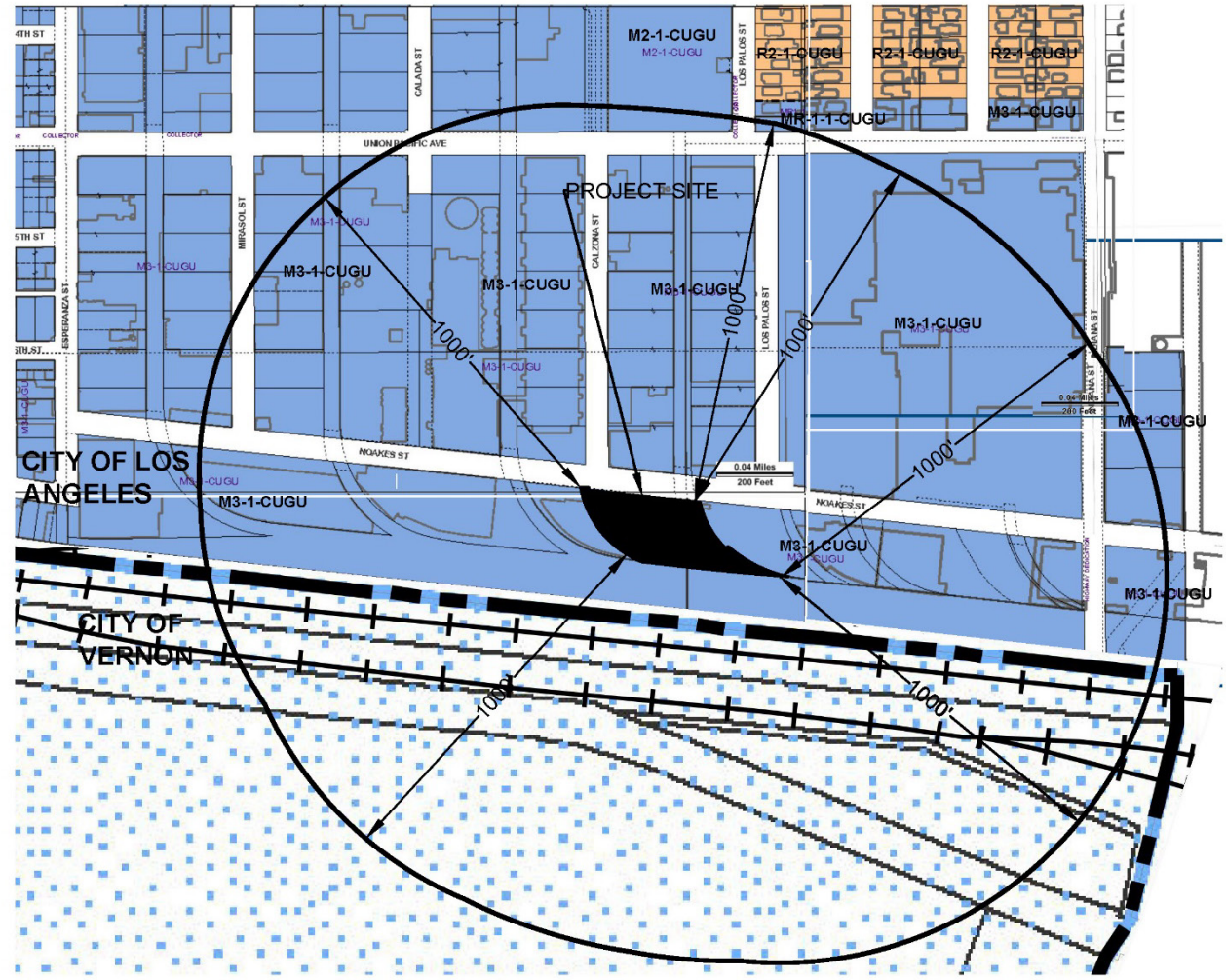


FIGURE 3 - OVERALL SITE PLAN

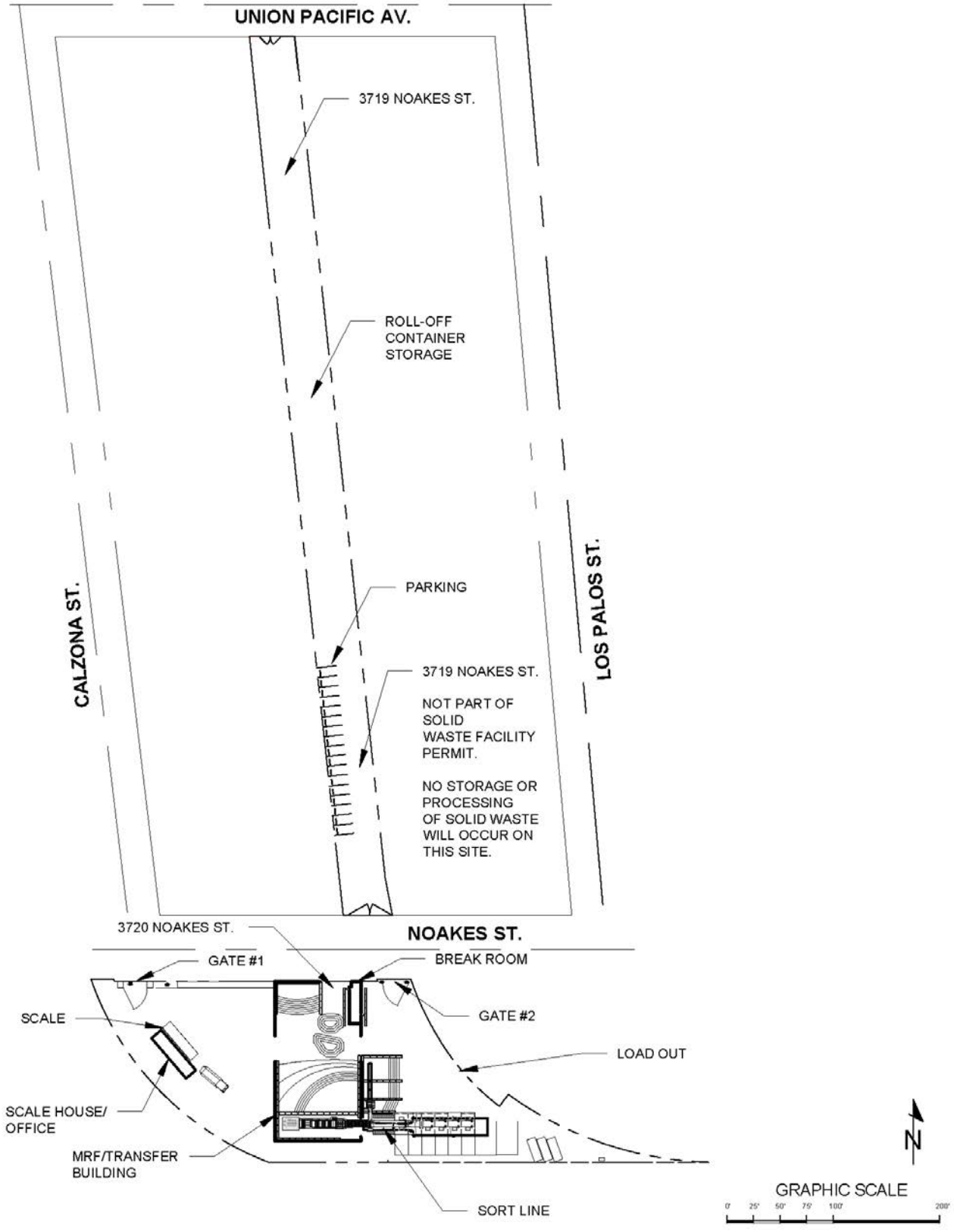
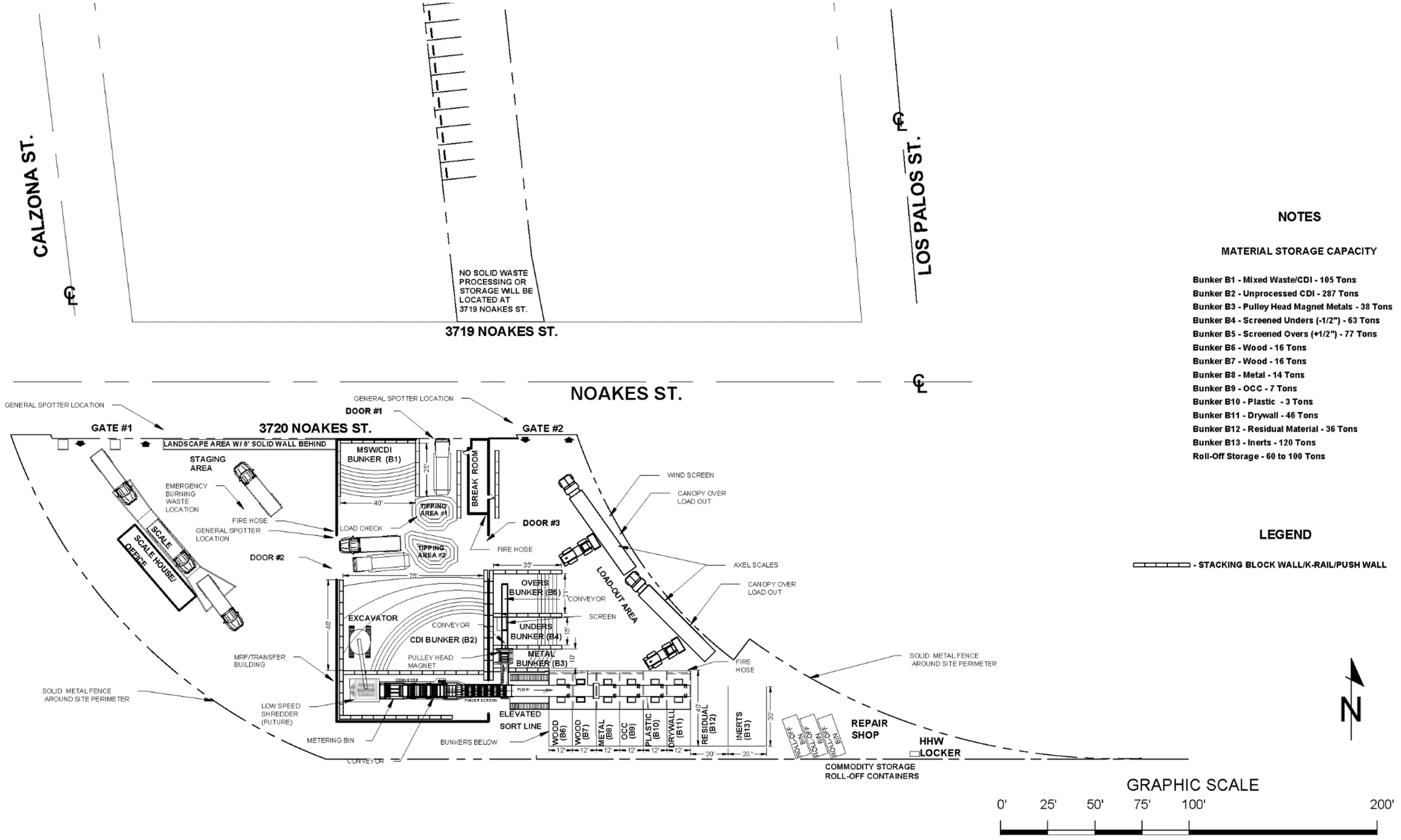


FIGURE 4 - SITE PLAN



NOTES

MATERIAL STORAGE CAPACITY

Bunker B1 - Mixed Waste/CDI - 105 Tons
Bunker B2 - Unprocessed CDI - 287 Tons
Bunker B3 - Pulley Head Magnet Metals - 38 Tons
Bunker B4 - Screened Unders (-1/2") - 63 Tons
Bunker B5 - Screened Overs (+1/2") - 77 Tons
Bunker B6 - Wood - 16 Tons
Bunker B7 - Wood - 16 Tons
Bunker B8 - Metal - 14 Tons
Bunker B9 - OCC - 7 Tons
Bunker B10 - Plastic - 3 Tons
Bunker B11 - Drywall - 46 Tons
Bunker B12 - Residual Material - 36 Tons
Bunker B13 - Inerts - 120 Tons
Roll-Off Storage - 60 to 100 Tons

LEGEND

- STACKING BLOCK WALL/K-RAIL/PUSH WALL

1.4 NATURE AND QUANTITY OF WASTES

1.4.1 Waste Types

This facility will only accept up to 500 tons per day of non-hazardous MSW and construction/demolition-inert (CDI) materials. No high liquid content wastes, no designated wastes, no hazardous wastes, and no wastes requiring special handling are accepted by this facility.

A Hazardous Waste Load Checking Program has been implemented to enforce this policy. A copy of this policy is included as **Appendix B**.

1.4.2 Waste Quantities

The facility will be permitted for a maximum throughput of 500 TPD and will have a 600 TPD design capacity. The anticipated average annual throughput over the first five years is 145,600 tons of solid waste, as shown in **Table 1**. This annual projection is an estimate, and actual tonnages may differ as a result of new or revised waste hauling contracts, legislative mandates, or changes in available landfill disposal capacity and tipping fees.

Weekly and seasonal variations may affect the averages shown in **Table 1**, but the maximum daily tonnage of 500 TPD will not be exceeded. Unusual peak loading or emergencies will be handled at the facility by adding manpower and equipment, and/or extending the length of shifts.

TABLE 1
ANTICIPATED AVERAGE ANNUAL TONNAGE

YEAR	TONS/DAY	TONS/YEAR*
2018	300	109,500
2019	350	127,750
2020	400	146,000
2021	450	164,250
2022	500	182,500
5-YEAR AVERAGE	**400**	**145,600**

* Based on 365 days per year operation

1.5 TYPES AND NUMBERS OF VEHICLES

The following types of vehicles will use the facility:

- **Inbound Vehicles**: collection trucks, roll-off trucks, and public self-haul vehicles
- **Outbound Vehicles**: transfer trucks, end-dump trucks, 10-wheel dump trucks, roll-off trucks, flatbed trucks, or stake bed trucks.
- **Employee and Visitor Vehicles**: cars, trucks and vans.

Table 2 summarizes facility traffic projected at the peak permitted capacity of 500 TPD based on our understanding of the existing and future operations at the Direct Disposal facility as well as our experience designing and permitting with other similar facilities.

TABLE 2
FACILITY TRAFFIC

VEHICLE TYPE	VEHICLES PER DAY (@500 TPD)[1]
Inbound Vehicles	
Commercial Vehicles	88
Self-Haul	60
Outbound Vehicles	
Transfer Trucks/End Dumps	23
Employee Vehicles[2]	54
TOTAL VEHICLES PER DAY	**225**

[1] Inbound Commercial Vehicles: 5 tons per load; Inbound Self-Haul Vehicles – 1 ton per load; Outbound Trucks: 23 tons per load.

[2] Total employees over two shifts. Some employees carpool, take mass-transit, or ride bikes to work

The facility design includes adequate parking space for employee and visitor vehicles.

2.0 REGULATORY REQUIREMENTS

2.1 PERMITS AND APPROVALS

The following regulatory requirements apply to the FACILITY:

- **Land Use Permit –** The facility has Certificates of Occupancy from the City of Los Angeles for a recycling materials sorting facility with outdoor storage of materials and parking at 3720 and 3719 Noakes Street. Reference Use of Land Permits 16016-20000-24736, 16020-20001-03077 and 16020-20001-03078.

- **Environmental Documentation** – An environmental Initial Study/Mitigated Negative Declaration was completed on September 7, 2020, and no significant adverse impacts were identified that could not be mitigated to a level of significance. The Mitigated Negative Declaration and a Notice of Determination was adopted by the Local Enforcement Agency on PENDING.

- **City Non-Disposal Facility Element (NDFE)** – In July 2006, the City Council of Los Angeles, CA added the Direct Disposal C&D facility to the City of Los Angeles's NDFE. The Direct Disposal NDFE was amended in June of 2018 to allow transfer and processing of up to 1,000 TPD of solid waste (reference NDFE Facility #85), a copy of which is included in Appendix I.

- **Storm Water Permit** - The facility has a General Industrial Storm Water Permit (NPDES) with the State Water Resources Control Board (SWRCB), WDID# 4 191019849. A Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program Plan (MPP) have been developed.

- **Hazardous Waste Generator ID Number** - The facility has obtained a State Site Specific Identification number from the Department of Toxic Substances Control: CAL000284659. This number is used for all manifesting, record keeping, and reporting required for materials discovered through the load-checking program.

- **Solid Waste Facilities Permit** – The facility has a Large Volume Transfer Processing Solid Waste Facility Permit from the LEA and CalRecyle a copy of which is kept on file at the facility.

3.0 FACILITY DESIGN

3.1 OPERATIONS

3.1.1 Site Plan

The Direct Disposal MRF and Transfer Station is designed to receive, process and transfer CDI and MSW.

The Direct Disposal MRF and Transfer Station includes the following features:

- Incoming truck queuing area
- Scale house & scale
- Material Recycling Facility (MRF) Transfer Station Building
- Exterior stockpiles, bunkers and material storage areas
- Parking areas
- Processing equipment
- Elevated Sort Line
- Load out area

3.1.2 Circulation

Regional access to and from the project site is available from the 5 (Santa Ana) Freeway via Calzona Street, the 60 (Ponoma) Freeway via s. Indiana Street, E. 3rd Street, S. Downey Road, or the 710 (Long Beach) Freeway via S. Eastern Avenue and E. Olympic Boulevard. Local access to the site is available via S. Indiana Street, S. Downey Street, E. Olympic Boulevard, Union Pacific Avenue, Calzona Street, Los Palos Street and Noakes Street which are all designated local streets that serve industrial businesses in the area.

Most vehicles delivering material to the facility enter the site through Gate #1 and proceed to the scale to obtain a weight ticket. After weighing in, vehicles will make a 180 degree turn and backup through Door #2 into Tipping Area #2 to unload or pull back onto Noakes Street and back into Tipping Area #1 through Door #1. Noakes Street will be used for queuing. After unloading, vehicles without TARE weights will proceed back to the scale and then exit the site through Gate #1. Vehicles with TARE weights will not need to weigh-out.

Wheel loaders and/or excavators will be used to load CDI material into the screen hopper for processing over the sort line, as well as to load outgoing recyclables, MSW, and CDI waste residue.

All outgoing recyclable materials and transfer trucks enter and exit the facility from Gate #2 located on the east side of the MRF/transfer building. Empty trucks will back into the load-out area which can accommodate two trucks at a time. Axel scales will be used to

maximize outgoing material loads. During waste receiving hours, facility personnel in the scale house monitor incoming traffic. During non-waste receiving hours, fences, walls, and gates secure the site at all entry and exit points.

Figure 5 shows vehicle circulation patterns at the facility.

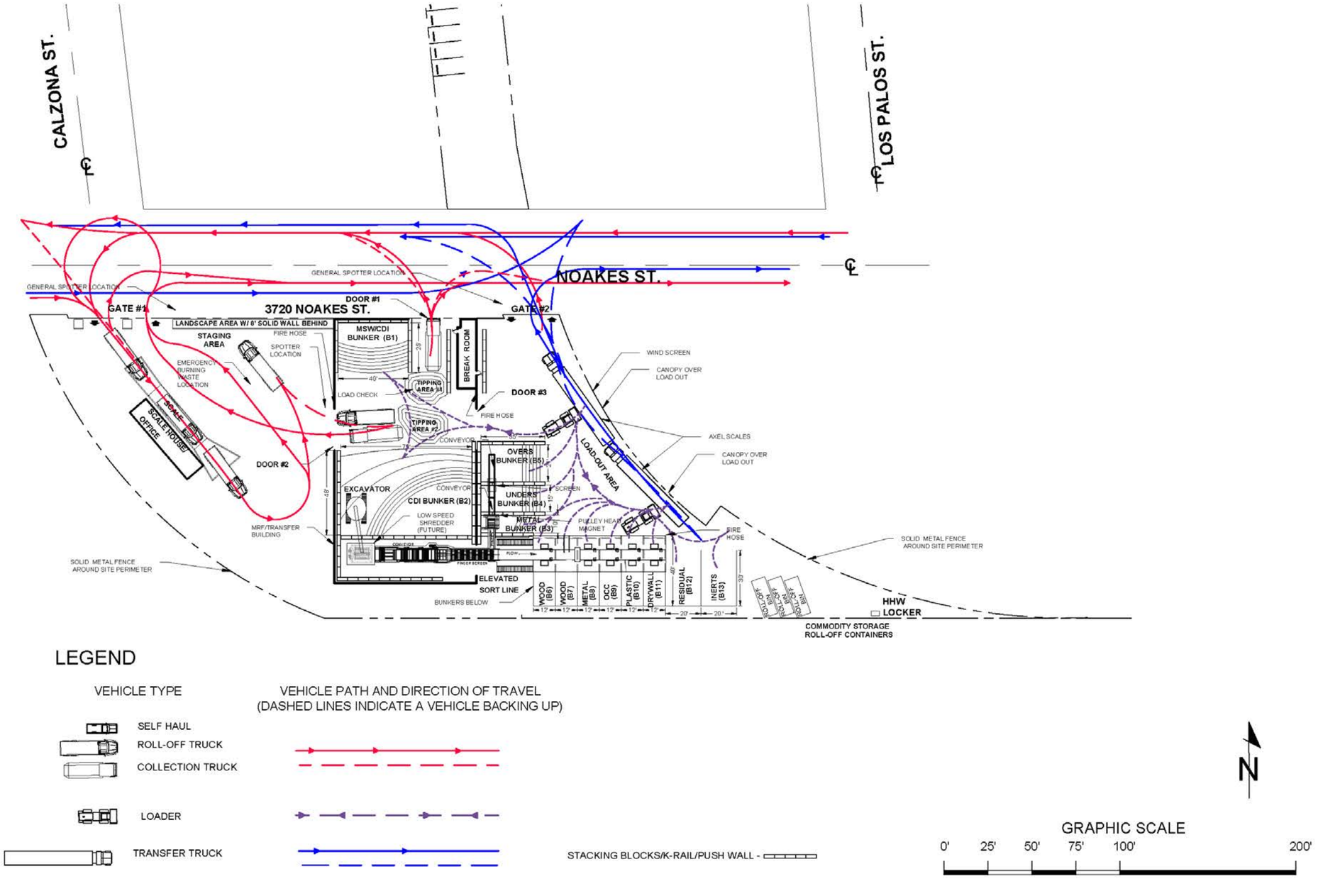
Employees park on the west side of the main building and on company-owned property at 3719 Noakes Street. All traffic within the facility is organized in such a manner to reduce the possibility of accidents. Outgoing material transfers are staged during non-peak hours. In case of delays in the tipping area, trucks can queue on and to the north of the truck scale, and along Noakes Street.

All first-time incoming trucks weigh the truck and container separately to get their TARE weights. All TARE weights are stored in the Direct Disposal computer system for future use. In case of equipment breakdown, or when the tipping areas gets filled up, the facility will not accept any additional material until the equipment is fixed and space is cleared. The facility never accepts more than the permitted tonnage. The facility typically processes all C&D material within 10-15 days of receipt. All MSW and residual material will be removed from the facility within 48 hours of receipt and/or processing.

3.1.3 Tipping Areas

The Direct Disposal facility includes two tipping areas inside the MRF/transfer building that can accommodate up to three vehicles (Tipping Area #1 and Tipping Area #2).

FIGURE 5 - CIRCULATION PLAN



3.1.4 Storage Areas

Once a load is tipped inside the MRF/transfer building, the material will be pushed by a loader to the appropriate bunker based on material type. When accepted, MSW will be pushed into Bunker #1 and loaded out within 48 hours of receipt. Initially, no more than 100 TPD of MSW will be accepted at the facility. LEA approval will be required to process more than 100 TPD of MSW.

CDI material will be pushed by loaders into Bunker #2 and loaded onto the sort line for screening and processing with an excavator. A shredder may be added to the front of the sort line in the future. If no MSW is being delivered to the facility, both interior bunkers will be used for storage of CDI material. All bunkers will be delineated with stacking blocks, k-rails or other similar means of physical separation to allow easy identification of material type. Stacking blocks or push walls will also be used to provide a barrier between material piles and building walls. The LEA will be notified of any changes in bunker configurations as well as to any changes in the material type stored in the bunkers.

Waste and commodity storage are minimized by maintaining a list of on-call haulers that can respond in a timely manner and keeping all stored material within designated bunkers or in roll-off containers. In accordance with State law, MSW and residual CDI material are removed within 48 hours of receipt or generation, and CDI material is processed within 15 days of receipt. Generally, all MSW and residual CDI material will be transferred from the facility within 24 hours of receipt, and by the end of daily operations all material will be transferred from the facility or containerized. Containerized material will be stored within the project site boundaries in transfer trucks.

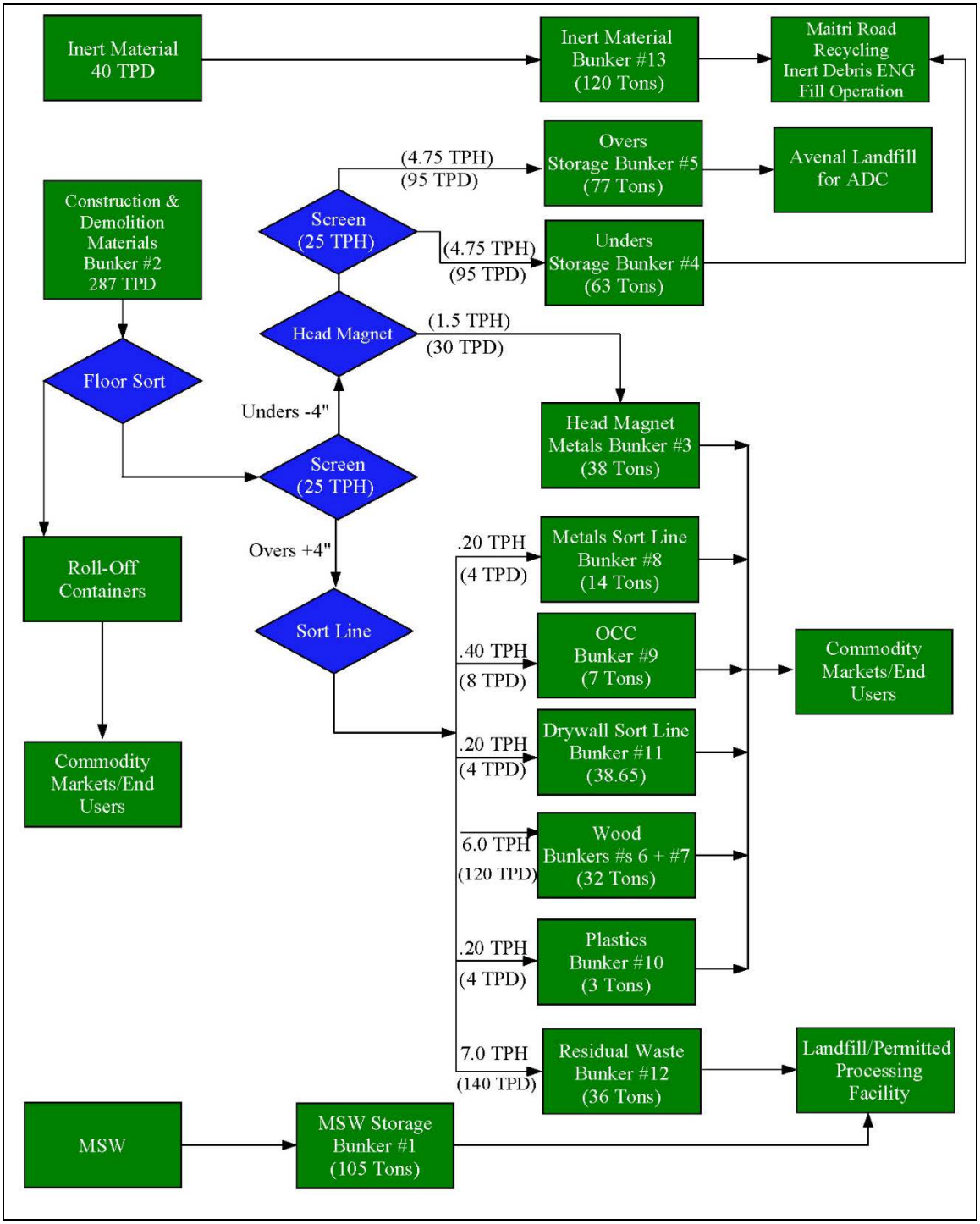
3.1.5 Parking Areas

Direct Disposal will park company collection and transfer trucks onsite and at 3719 Noakes Street and has a "Collection Vehicle Yard Permit" with the City of Los Angeles. On-site parking is also provided for employees and visitors.

3.1.6 Waste Flow and Mass Balance

Figure 6, Waste Flow Diagram, presents an approximate flow of materials through the facility from unloading through processing, sorting, and load out. This may vary substantially depending on the types and composition of materials received in the future. Material handling activities involved in this waste flow are discussed in **Section 5**, Operations.

FIGURE 6 - WASTE FLOW DIAGRAM



3.1.7 Surface Drainage and Runoff Control Plan

A Stormwater Pollution Prevention Plan which includes drainage and runoff control plan is included as part of the Stormwater NPDES Permit. The purpose is to ensure that runoff does not contain solids or other contaminants; that flooding does not occur, and that erosion is avoided. Being able to tip CDI material and MSW inside a building during periods of inclement weather minimizes the potential for adverse stormwater impacts. Proposed non-structural Best Management Practices include: 1) Turning away any leaking truck; 2) Regularly scheduled preventative maintenance of facility vehicles; 3) Use of absorbent material to soak-up spots of leaked fluids; 4) Implementing a litter control plan as contained in **Appendix C**; and 5) Regular cleaning of all areas.

3.1.8 Industrial Wastewater Discharge

No process or quench water is used as part of the site operations and no industrial wastewater will be discharged from the site. Most of the water used as dust control in the tipping area is absorbed into the unprocessed material pile or evaporates. No contact runoff leaves the site.

3.1.9 Utilities

The Los Angeles Department of Water and Power provides both power and water to the facility. Sewer services are provided by Los Angeles Department of Public Works.

The facility will be permitted to operate 24/7, with schedules adjusted based on the amount of material being received.

3.1.10 Hours of Operation

The facility will be permitted to operate 24/7, with schedules adjusted based on the amount of material being received.

The C&D sort line will operate between 16 to 20 hours each day which should provide an adequate amount of time for maintenance and repair of sorting equipment as well as facility cleaning. It is estimated that the sort-line shifts would be from 5:00 a.m. to 2:00 p.m. and from 2:00 p.m. to 11:00 p.m.

The start of the operating day for purposes of calculating daily amounts of waste received is 12:00 a.m. (midnight). The following are the proposed hours of operation by activity:

Operating Schedule

Open to the Public: 5:30 a.m. to 7:30 p.m. (Monday through Sunday)
Transfer/Processing Operations: 24 hours a day, 7 days a week

Maintenance Schedule

Personnel will be assigned to general facility cleaning and equipment maintenance during all operating hours.

Cleaning Schedule – Operations, facilities, and equipment, boxes, bins, pits and other types of containers shall be cleaned daily between 1:00 a.m. and 5:00 a.m., in order to prevent the propagation or attraction of flies, rodents, or other vectors.) The entrance and exit shall be cleaned as needed during the operating day to prevent the tracking or off-site migration of waste materials. Cleaning and maintenance schedules can limit operations and have been considered in calculating the facilities throughput and capacity. As the facility increases its throughput and adds new waste steams it may be necessary to revisit the maintenance schedule in the future. The LEA will be informed prior to making any changes to the facility maintenance or cleaning schedule.

The facility is closed on the following holidays: New Year's Day, Memorial Day, 4th of July, Labor Day, Thanksgiving and Christmas.

3.1.11 Station Equipment

Table 3 lists the type of equipment and estimated number of units anticipated at the peak throughput of 500 TPD:

- Roll-Off and Collection Trucks: These trucks and drivers will be provided by outside contractors as well as Direct Disposal with Direct Disposal parking company trucks onsite at the FACILITY.
- Material Marketing Trucks: These trucks and drivers will be provided by outside contractors and will not be based at the FACILITY.
- Transfer Trucks: These trucks and drivers will be provided by outside contractors and will not be based at the FACILITY.
- Self-Haul Vehicles: These vehicles and drivers are from the local community and will not be based at the FACILITY.
- Elevated sort line and associated conveyors.
- Vibrating Finger Screen (-4") and trommel screen (-1/2")
- Pulley Head Magnet

C&D material received at the facility is processed over a minus four-inch (-4") vibrating finger screen with the "overs" being conveyed to an elevated 10-person sort line and the "unders" conveyed to a bunker for temporary storage. A pulley head magnet removes metal from the "unders" which is also temporarily stored in a bunker/pile. **Appendix H** contains diagrams of sorting equipment used at the Direct Disposal MRF and Transfer Station.

TABLE 3
ESTIMATED STATION EQUIPMENT

Equipment Type	At 500 TPD
Loaders	2-3
Excavator	1-2
Forklifts	1
Electronic Axle Scales	1-2
Electronic Truck Scales	1-2
Screens	2
Conveyor w/ pulley head magnet	1
Elevated Sort Line	1
Shredder (Future)	1
Trommel Screen (Future)	1

3.1.12 Preventative Maintenance Program

An equipment preventative maintenance program has been implemented at the facility to ensure the reliability of all equipment and vehicles.

The site is cleaned daily to collect loose litter and dust. At the end of each day, travel-ways as well as any exposed portions of the tipping floor are cleaned using dry clean-up methods. The entrance and exit are cleaned as needed to prevent the tracking or off-site migration of waste materials. All areas of the site including the areas south of the transfer building and the eastern portion of the site will be monitored for litter and debris and kept in a clean, neat and orderly manner.

3.1.13 Standby Equipment

To assure ongoing operations, the following back-up equipment, beyond that listed in **Table 3**, will be maintained at the facility, or will be available from off-site sources on an on-call basis:

- One (1) loader
- One (1) forklift

To assure fast repair, adequate parts and supplies are kept on-site and maintenance contracts are established with local equipment vendors. For the quick replacement of mobile equipment, local equipment rental companies in Los Angeles can provide same day delivery of loaders and forklifts.

3.1.14 Hazardous Waste Handling Equipment

Hazardous waste discovered on the tipping floor will be handled by property trained employees. The equipment used to handle hazardous waste may consist of the following Personal Protective Equipment (PPE):

- *Eye protection*: safety glasses or goggles
- *Body protection*: hard hats, disposal coveralls or Tyvec sleeve, Nitryl gloves, neoprene aprons and steel-toed boots
- *Respiratory Protection*: Dust masks or respirators (if needed)

For the storage of hazardous wastes, at a minimum, EPA-approved 55-gallon drums will be used, along with overpack drums, and a portable hazardous waste storage locker with secondary containment and lockable doors.

3.1.15 Hazardous Waste Load Checking Program

In accordance with CCR Title 22, a hazardous waste load checking program will be implemented at the facility to detect and properly handle liquid, hazardous, radioactive, eWaste and/or special wastes (infectious wastes, dead animals, and sludge) that have been inadvertently received. **Appendix B** contains a copy of the program. Hazardous wastes are manifested and transported off-site to a permitted disposal facility in accordance with local, state, and federal laws. e-Waste, if applicable, is hauled to an e-waste processor for recycling.

3.1.16 Hazardous Waste Storage

Hazardous wastes discovered as part of the hazardous waste load-checking program are properly containerized, inventoried, and temporarily stored in a Hazardous Waste Locker located outside the tipping building and away from on-site traffic patterns (see **Figure 4**, Site Plan, for hazardous waste locker location). All Federal, state and local hazardous waste

laws and regulations are followed. For the storage of hazardous wastes, at a minimum, approved containers will be used, along with overpack drums, and a portable hazardous waste storage locker with secondary containment and lockable doors. Storage containers with flammable, poisonous or corrosive substances (bases) must be separated from drums with corrosive (acids) and oxidizers. Hazardous waste discovered on the tipping floor or on the sorting platforms will be handled by properly trained employees. The equipment used to handle hazardous waste may consist of the following Personal Protective Equipment (PPE):

- Eye protection: safety glasses or goggles
- Body protection: hard hats, disposal coveralls or disposable sleeve, PVC or Nitrile gloves, PVC or poly-coated aprons and steel-toed boots
- Respiratory Protection: Dust masks or respirators (if deemed necessary by the Safety Manager)

3.1.17 Water Supply and Sanitary Facilities

City of Los Angeles provides the potable water supply. Water fountains or other potable water dispensers and sanitary facilities will be located in the new building breakroom for operations employees.

3.1.18 Communications

The facility has a communications network between the scale house, loaders and office to ensure smooth operation. The scale house is equipped with an intercom phone system, outside phone line, and paging system. Supervisors, key management and loader operators are equipped with two-way radios which will be used as the primary means of communication. Unnecessary use and noise from the exterior loudspeakers will be minimized.

3.1.19 Lighting

The facility has outdoor lighting sufficient to conduct operations during non-daylight hours. Outdoor lighting consists of structure-mounted fixtures directed to the interior of the site to reduce glare. Outdoor lights are shielded to limit light and glare on adjacent properties.

3.1.20 Fire

Fire extinguishers are located per the requirements of the Fire Marshal. Existing fire hydrants are located throughout the site. The site will be maintained in a manner that allows fire department access to all areas in the event of an emergency.

3.1.21 Safety Equipment

The facility requires that employees directly involved in waste handling operations be properly outfitted with Personal Protective Equipment (PPE). At a minimum, these employees are required to wear hard hats, safety glasses or goggles, safety vests, gloves, and safety boots. In addition, ear protection will be provided as necessary for all employees. Employees involved in hazardous waste handling are required to wear specialized safety equipment.

The facility has operational controls and safety devices for equipment to protect employees. Railings, curbs, grates, fences and other controls have been designed to meet OSHA standards in order to ensure the safety of each employee.

Supervisors are responsible for the following:

- monitoring and evaluating safety equipment at the facility to ensure that it is in good condition and adequate stock
- inspecting the (PPE) daily while touring the facility
- issuing new PPE as needed, or at the request of employees
- inspecting hazardous waste response equipment on a monthly basis, any items will be replaced as needed
- checking fire extinguishers, first aid kits, and eye wash kits monthly.

3.1.22 Emergency Provisions for Power Failure

If electrical power to the site is temporarily lost, the sort line will not operate but top loading of waste can continue. If power is lost for an extended period, collection trucks and self-haul vehicles may be instructed to bypass the facility and deliver their loads directly to permitted landfills. The operator will notify the LEA of such an event, the expected duration and the MRFs and/or landfill(s)/location(s) being used.

3.2 DESIGN CALCULATIONS

3.2.1 Station Capacity

This section substantiates the facility's ability to handle the proposed permit design capacity of 500 TPD and the design capacity of 600 TPD without causing environmental harm or safety problems.

3.2.2 Vehicle Loading and Unloading

The following assumptions and calculations support the facility design with respect to vehicle loading and unloading.

- Queuing

  As shown on the site and circulation plans, up to five inbound vehicles can queue in the scale area and multiple vehicles can queue off-site. Traffic control spotters will be used to ensure safe and efficient traffic flows both on and off-site.

- Weigh-in/Off-loading

  At a maximum throughput of 500 TPD, a total of 148 inbound vehicles are anticipated to use the facility daily. Based on 12 hours of material receiving, an average of approximately 12 trucks per hour are anticipated to use the facility. Peak periods could result in traffic surges that are double the hourly average, or up to 24 inbound vehicles per hour.

  Based on a 90-second weigh-in time, up to 40 vehicles could weigh-in each hour which would exceed the 24 vehicles anticipated during peak traffic surge periods.

  Up to three vehicles can tip their loads simultaneously onsite. Assuming a truck can back in, tip, and pull out in 10 minutes, 18 trucks per hour could unload per hour which should be sufficient to accommodate peak traffic surge periods.

- Allocation of Incoming/Outgoing Materials

  As each vehicle weighs in, the scale operator will ask the driver for the origin of the load and note it on the weigh ticket. Direct Disposal will report total diversion and disposal tonnages for each jurisdiction using the facility per the requirements of CalRecycle's Disposal Reporting System for transfer stations, and as legally required by any other State or local agencies.

3.2.3 Material Tipping and Storage

The Direct Disposal site can accommodate approximately 860 tons of pre- and post-processed material which will be stored in piles, bunkers and roll-off containers as shown in **Figure 4**, and summarized in and **Table 4** below. Total site capacity will vary depending on the types of materials received. Detailed material storage capacity calculations are included in **Appendix A**.

TABLE 4
SITE MATERIAL STORAGE

Bunker/Pile #	Material	Capacity (in tons)
Bunker #1[1]	CDI/ MSW	105
Bunker #2	CDI	287
Bunker #3	Metal from Pulley Head Magnet	60
Bunker #4	Screened Unders (-1/2")	63
Bunker #5	Screened Overs (+1/2")	30
Bunker #6	Wood Waste	16
Bunker #7	Wood Waste	16
Bunker #8	Metal	14
Bunker #9	OCC	7
Bunker #10	Plastic	3
Bunker #11	Drywall	46
Bunker #12	Residual Material	36
Bunker #13	Inerts	120
Commodities Storage Roll-Off Bins	Recovered Materials	60
TOTAL STORAGE CAPACITY		**863**

[1] Bunker B1 will be used for storage of MSW if and when it is accepted at the facility. If MSW is not being accepted at the facility Bunker #1 will be used for CDI material.

3.2.4 Material Processing

The sorting system is capable of processing between 20 and 25 tons per hour of CDI material with 10-12 sorters manning the picking stations. With a 20-hour operating day, a total of 500 tons per day of CDI material could be processed. Inert materials that do not require processing over the sort line will be tipped in designated areas and loaded directly into 10-wheel dump trucks or end-dump trucks.

The C&D sorting system is comprised of variable size screens, transfer conveyors, a sort-line conveyor, picking station platform and bunkers. An excavator loads C&D material onto an infeed conveyor with an initial screen of 4". The larger fraction (+4") from the screen will be transferred to the picking station conveyor. The picking station can accommodate up to 12 laborers per shift, with the actual number based on the tonnage received, the composition of incoming material, and other factors. Laborers pick recyclable materials and throw them down the chute to the respective bunker below. Waste residue is carried to the end of the conveyor and dropped to the area designated for accumulation. Bunkers under the picking stations provide storage for recovered wood, metal, old corrugated cardboard (OCC), plastic, and drywall. Additional material will be available in roll-off containers located at the rear of the site.

The unders fraction (-4") will be conveyed over a pulley head magnet to remove ferrous metals which will be stored in Bunker B3, and non-ferrous material conveyed to a screen that will remove fines (-1/2") for storage in the Inerts Bunker B4) and convey the overs (+1/2") to ADC Bunker B5.

A shredder and metering bin may be added to the front end of the sort line in the future to size material for improved material sorting and recovery efficiency, and the picking station may be modified to increase storage bunker capacity.

MSW will be tipped inside the transfer station building, pushed into the appropriate bunker and loaded-out directly into transfer trucks for delivery to permitted landfill or solid waste processing facilities.

3.2.5 Outgoing Waste

Outgoing MSW and sort-line residual material is not stored onsite for more than 48 hours, by implementing a "first in, first out" method, and most of these materials are shipped within 24 hours. Waste residue is transported to the Sunshine Canyon, or Chiquita Canyon landfills.

3.2.6 Outgoing Recyclables

All recyclables recovered at the C&D facility are removed from their respective bunkers, loaded into various transfer and commodities trucks, and sent to the facilities that accept recycled materials. Recovered C&D material sorted for reuse or resale is removed from the site within one month. All outgoing recyclables except inerts and wood are stored in material storage bunkers or stockpiles located on-site. These materials are shipped either early in the morning, at the end of the workday or as a back-haul.

3.2.7 Waste Transfer

The following formula, which is based on the rate transfer trucks are loaded, is used to calculate maximum transfer capacity:

Capacity = (Pt x N x 60 x Ht)/(Tt + B) [1]

Where:

Pt = Transfer trailer capacity (tons)
N = Number of transfer trailers loading simultaneously
Ht = Hours per day used to load trailers (empty trailers must be available)
Tt = Time to load each transfer trailer (minutes)
B = Time to remove and replace each loaded trailer (minutes)

Using the EPA formula, and as shown in **Table 5**, the facility could transfer over 1,104 tons of material per day over an 8-hour operating day, with payloads of 23 tons. Each truck would need to be loaded within ten minutes and removed and replaced within ten minutes.

TABLE 5
TRANSFER CAPACITY

Pt = Transfer trailer capacity (tons)	23
N = Number of transfer trailers loading simultaneously	2
Ht = Hours per day used to load trailers (empty trailers must be available)	8
Tt = Time to load each transfer trailer (minutes)	10
B = Time to remove and replace each loaded trailer (minutes)	10
TOTAL TRANSFER CAPACITY	**1,104**

[1] United States Environmental Protection, Office of Solid Waste. *Waste Transfer Stations: A Manual for Decision-Making.* June 2002. United States Environmental Protection Agency Solid Waste and Emergency Response (5306W) EPA530-R-02-002, pg. 9.

4.0 STATION IMPROVEMENTS

4.1 SIGNAGE

A signage plan, conforming to City of Los Angeles planning standards, ensures safe operations. Signs are maintained and replaced as needed to ensure easy readability and maintain aesthetics. At a minimum, the following signs are posted with the following information:

Sign Located at the Entrance of the Facility
Hours of Operation, Days of Week
Name of Facility and Operator
Materials Accepted/Not Accepted
Speed Limit
Facility Telephone Number

Sign Located at the Scale House
Rates and Fee Schedule
Transfer Station Rules (stay in truck, etc.)
Tarping Requirements

4.2 SECURITY

During waste receiving hours, facility personnel stationed in the scale house monitor all incoming traffic. During non-waste receiving hours, a combination of walls and gates secure the site at all entry and exit points.

4.3 ROADS

The entire site is paved except for a landscaping strip along Noakes Street. Daily sweeping is conducted to remove litter and provide dust control and periodic inspections are conducted to maintain the integrity of the paved surfaces. The site is accessible during dry and wet weather periods.

4.4 VISUAL SCREENING

A solid 8-foot tall fence surrounds the site and screens operations from offsite views. The MRF and transfer station building itself also screens site activities from off-site views.

5.0 MANAGEMENT, STAFFING AND TRAINING

5.1 Management and Staffing

The Facility is fully staffed with trained personnel to accommodate the level of operations at all times during operation hours, including daily and seasonal fluctuations in material load deliveries.

Figure 6 shows an organizational chart for the operation of the facility. Facility management is selected based on their proven experience in the waste management and recycling industry. **Appendix D** contains capsule resumes of key people.

Table 6 lists the facility positions and number of personnel anticipated at the facility at the 500 TPD operation. The number and assignments may change to some extent depending on operational requirements. The operation is typically conducted over 1 shift, but could be extended to a second shift, if needed.

Table 7 and **Table 8** contain emergency contact information.

All employees receive training including, but not limited to safety, health, environmental controls, and emergency procedures. The training programs offer standardized training for all employees in company operations, policies and procedures, as well as additional training based on the specific job description and responsibilities of the employee. For example, sorters are trained to recognize the types of hazardous or special waste that may be inadvertently included in the loads brought to the facility. Employees receive regular safety briefings.

Direct Disposal was founded by Daniel and Tamara Agajanian in 1999. Daniel Agajanian is the President and Tamara is the Secretary Treasurer. See **Figure 7** for the Direct Disposal, Inc. Organization Chart.

FIGURE 7 - ORGANIZATION CHART

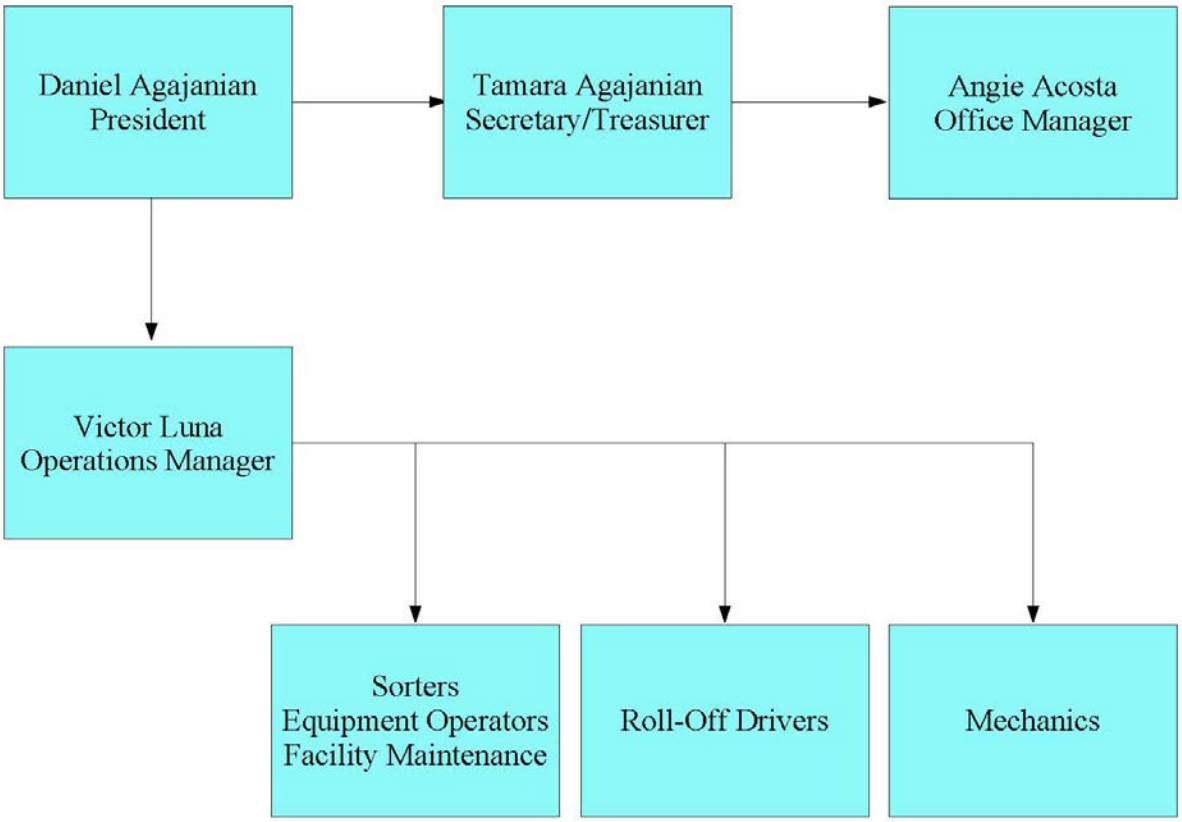


TABLE 6
FACILITY STAFFING

Position	Employees (At 500 TPD)
Facility Management	
Manager	1
Operations	
Supervisor/Foreman	2
Sorters	10-12
Floor	2
Equipment Operators	
Forklift Operators	1
Loader Operators	3
Sweeper Operator	1
Spotters	2
Scale house Attendants	2
Maintenance	
Mechanics	2
TOTAL	**26-28**

TABLE 7

CORPORATE EMERGENCY CONTACT LIST

Name	Phone Number
Dan Agajanian - Manager	Office: (323) 262-1604 Cell: (714) 936-8548
Angie Acosta – Office Manager	(323) 262-1604
Victor Luna –Manager	(323) 262-1604

TABLE 8
OUTSIDE AGENCY EMERGENCY CONTACT LIST

TYPE OF EMERGENCY	AGENCY	PHONE NUMBER
General Emergency	Emergency Dispatch	911
Fire or Haz. Waste Spill	City Fire Department	911 or (213) 485-5971
Explosives	LAFD and City Fire Department	911 (877) 275-5273 (Police) (818) 756-8677 (Fire)
Security	LAPD	911 or (877) 275-5273
Hazardous/Suspected Hazardous Waste, Unknown Sludges, Slurries and Liquids	City of Los Angeles Fire Or County of Los Angeles Hazardous Waste Material Disposal	(818) 756-8677
Medical Waste	City of Los Angeles Fire Department or Los Angeles Environmental Health Division	(818) 756-8677 (213) 580-1070
Injuries/Non-Emergency Medical Assistance	.	(213) 747-7667
Radiation	LA County Health Services Radiation Management Program	(213) 351-7897
Any of the above, also contact	Los Angeles Dept., of Building & Safety, Local Enforcement Agency (LEA)	(213) 252-3939

5.2 Health and Safety Training

A comprehensive Safety Compliance Program has been implemented at the facility. The Safety Compliance Program entails the monitoring and training of the facility's maintenance and safety procedures. Elements of the Safety Compliance Program are monitored on a daily, weekly, or monthly basis. The program features a Safety Inspection Report, which is completed on a regular basis. Items found to need maintenance are brought to the attention of the Operations Manager. See **Appendix F** for an example of the Safety Inspection Report.

A health and safety program has been implemented at the facility to ensure the health and safety of employees and the public visiting the facility. It includes the following programs:

- Employee Safety Training Program
- Injury and Illness Prevention Program (IIPP)
- Emergency Procedures and Contingency Plan
- Hazard Communication Program
- Energy Control (Lockout/Tagout) Program
- Respiratory Protection and Hearing Conservation Programs

6.0 STATION CONTROLS

This section discusses how the facility will be designed and operated to meet State Minimum Standards relating to transfer stations, Title 14, Section 17406.1 et. seq.

This section describes the methods used by the facility to comply with each state minimum standard required by CCR, Title 1, Division 7, Chapter 3.0 Article 5.9 commencing at Section 17380, and specifically, Article 6.2; and sections 17406.1, 17406.2, of article 6.1; 17414 of Article 6.3; and Article 6.35

ARTICLE 6.1

6.1 SITING ON LANDFILLS

The Direct Disposal Facility is not located on a landfill.

6.2 GENERAL DESIGN REQUIREMENTS [§ 17406.2]

The design of the facility was completed by Dan Agajanian of Direct Disposal and Clements Environmental.

The design was based on appropriate data regarding the expected service area, the nature and quantity of waste to be received, physical setting, adjacent land use, types and numbers of vehicles anticipated, adequate off-street parking, drainage control, the hours of operation and other pertinent information. Since the facility is open to the public, additional safety features have been incorporated.

The majority of incoming material is tipped inside the MRF/transfer station building with exterior tipping areas on the east and west side of the building used when necessary. The MRF/transfer station building as well as the solid 8-foot tall perimeter fence will minimize the potential for windblown material. Vectors are minimized by processing all material on a first-in first-out basis and always as quickly as possible. See following sections for dust control, noise control, public health, etc.

6.3 BURNING WASTES AND OPEN BURNING

Should the facility accidentally receive burning wastes or experience accidental ignition of wastes on the tipping floor, the following will occur:

- If the fire is small and manageable, the floor workers and loader operators will separate the burning waste from other wastes and deposit it outside the transfer

building on paved ground, and then put it out with water hoses and portable extinguishers (see **Figure 4** for location).

- If the fire appears to be a greater threat, 911 will be called immediately for assistance from the Fire Department. Loader operators may be able to isolate the burning material as described above, to minimize spread of the fire and danger to structures until help arrives.

In either, case, the facility will backtrack the waste to alert the generator and eliminate future occurrences. The operator will also notify the LEA within 24 hours of the fire and note the event in the Special Occurrences Log Book.

Open burning of any material at this facility is prohibited.

6.4 CLEANING

Operations, facilities, and their equipment, boxes, bins, pits and other types of containers are cleaned using the following schedule, or at a lesser frequency approved by the LEA, in order to prevent the propagation or attraction of flies, rodents, or other vectors:

- all operations and facilities are cleaned once each operating day of all loose materials and litter; and,

- the entrance and exit are cleaned throughout the day and when the facility closes to the public at 7:30 p.m. to prevent incoming traffic tracking or off-site migration of waste materials.

Dry sweeping and mechanical sweeping are used to clean and remove litter from the operating and surrounding area. Entrances and exits are cleaned as needed to remove litter that could blow offsite. In addition, the operation area and stationary equipment are cleaned by hand of accumulated dirt and debris on an “as needed” basis. This is typically done using dry sweeping methods but may also include water sprays. The minimal amount of water produced is absorbed in the residue material going to landfill, or simply evaporates.

Periodically the floor is steam cleaned with a disinfectant and odor control products.

Operations, facilities, and equipment, boxes, bins, pits and other types of containers shall be cleaned daily between 4:00 a.m. and 6:00 a.m. (or at lea, in order to prevent the propagation or attraction of flies, rodents, or other vectors.) The entrance and exit shall be cleaned as needed during the operating day to prevent the tracking or off-site migration of waste materials. Documentation of facility cleaning shall be maintained onsite that includes the responsible employee(s), time of cleaning and supervisor verification that cleaning as occurred.

6.5 DRAINAGE CONTROL

The facility has filed a Notice of Intent for the General Industrial Storm Water Permit and developed a Storm Water Pollution Prevention Plan (SWPPP), which describes best management practices to be employed at the facility.

Drainage at the facility is controlled to:

- Minimize the creation of contact water.
- Prevent to the greatest extent possible given existing weather conditions, the uncontrolled off-site migration of contact water.
- Protect the integrity of roads and structures.
- Protect the public health.
- Prevent safety hazards and interference with operations.

6.6 DUST and ODOR CONTROL

Dust will be controlled by limiting the tipping and processing of waste and recyclable material to the within the site which is surrounded by a solid fence and includes an overhead misting system as well as a tarps and screens. The misting system will be designed based on the dust generating activity to be mitigated such as tipping, processing or load-out as well as the material being processed, and take into account the height and location of the spray nozzles, coverage requirements and spray patterns. The misting system will be designed to provide adequate dust suppression over all dust generating activities onsite as well as to prevent dust migration offsite, to the satisfaction of the LEA. Employees working in the tipping, processing and load out areas may be required to wear dust masks. The paved surfaces are cleaned daily to minimize accumulation of dust and dirt, and therefore reduce dust kicked up by vehicles. Speed limits for trucks are set at 5 MPH to minimize dust. Spare parts for the misting system will be maintained onsite and broken or clogged nozzles will be replaced within 48 hours. All such repairs will be noted in the special occurrences log. If the misting system will be inoperable for more than 48 hour the LEA will be notified and alternative methods of dust control provided. The LEA will also be provided with a timeline for making any repairs and when the misting system is back online.

All incoming loads are checked for excessive odor. Odiferous loads will be transferred offsite as soon as possible, or they may be rejected at the scale-house. Should odiferous material be found in the tipping areas, it will be immediately sprayed with a handheld deodorizer and loaded out in the next transfer truck leaving the site.

6.7 HAZARDOUS, LIQUID, SPECIAL, RADIOACTIVE and e-WASTES

This facility will not intentionally accept hazardous materials including batteries, oil, paint, and special wastes. The facility has implemented a load-checking program, and procedures to handle hazardous material discovered on the tipping floor. The facility will not accept liquid waste or sludges.

In the unlikely event that such a load is detected, it will be moved away from all personnel and the LEA notified immediately. Asbury Environmental has been hired to be available on an emergency basis to clean up any major spills and to haul all hazardous material to a permitted disposal site.

A scale mounted radiation detector unit is located on site for detecting radioactive loads. In the unlikely event that such a load is detected, it will be moved away from all personnel and the LEA and County of Los Angeles Radiation Management Program will be notified immediately for further guidance and control actions.

e-Waste is not accepted at the facility. However, if it is discovered in the loads, it will be stored in a dumpster or on a pallet and then hauled to another facility certified as an e-Waste processor.

6.8 LITTER CONTROL

Litter will be controlled at the site in several ways:

- All unloading, processing and loading of material occurs within the site.
- A litter crew polices the site once per day, or as needed, picking up litter from the site perimeter, driveways, and within a 100-foot radius from the property boundary,
- Paved surfaces, driveways and the frontage along Noakes Street are swept daily and more often if necessary.
- A mandatory tarping policy is enforced requiring all incoming loads to be covered. Measures for enforcement include warnings, refusal of loads, and possible banning from the facility. See **Appendix C** for a copy of the Litter Control Program.

6.9 MEDICAL WASTES

The facility will not knowingly accept any medical waste. If medical waste arrives at the facility, the LEA, and the Los Angeles County Department of Health Services or Medical Waste Division will be notified. The material will be isolated, and all contact with employees or users of the facility will be eliminated. Red bag waste found in a load will be properly containerized, inventoried, and temporarily stored in a secure container/location until removed by permitted medical waste hauling/disposal company.

6.10 NOISE CONTROL

The site is located an industrial area. The primary adjacent land uses are a railroad yard and manufacturing/warehouse uses. There are no residential uses within 1,000 feet of the site.

Hearing protection is provided to equipment operators and others subject to excessive noise levels from operations, in compliance with OSHA. Employees are trained in the proper use and types of hearing protection, mobile equipment meets OSHA requirements and is maintained to operate in a clean, quiet, and safe manner.

6.11 NON-SALVAGEABLE ITEMS

Drugs, cosmetics, foods, beverages, hazardous wastes, poisons, medical supplies or syringes, needles, pesticides and other materials capable of causing health or safety problems will not be salvaged. All employees will be trained in this regard.

6.12 NUISANCE CONTROL

Strict operating practices, such as daily cleaning and prompt removal of waste material will be continued to ensure that the facility poses no nuisance to the community. The location of the facility in an industrial area also mitigates potential nuisances.

Dust will be controlled by limiting the tipping and sorting of waste and recyclable material to within the enclosed site. (See the **Dust and Odor Control Section** for additional nuisance control measures.)

6.13 MAINTENANCE PROGRAM

All aspects of the operation or facility are maintained in a state of good repair. The operator has implemented a preventative maintenance program to monitor and promptly repair or correct deteriorated or defective conditions.

6.14 PERSONNEL HEALTH AND SAFETY

The Injury, Illness, and Prevention Program (IIPP) is available for review by local and state inspectors during normal business hours. Nothing in this section is intended to make the LEA responsible for enforcing the IIPP. The Direct Disposal IIPP is maintained on the scale house onsite.

6.15 PROTECTION OF USERS

Loads delivered by the public in their own vehicles are tipping in a designated area of the tipping floor, separated from the commercial trucks. Traffic cones will be used to isolate this area, which may periodically be relocated from one area of the tipping floor to another.

Commercial haulers will also be directed by the scale house operator to a certain area of each tipping floor depending on the type of material in the load. The commercial haulers will typically be repeat customers and will therefore be familiar with onsite traffic circulation, tipping areas and procedure.

Spotters will help direct traffic to the appropriate tipping areas.

6.16 ROADS

The entire site is paved within the perimeter fence. This paving is kept clean by sweeping to keep dust down and prevent trucks from tracking dirt onto adjacent public roads.

6.17 SANITARY FACILITIES

The operator maintains all sanitary and hand-washing facilities in a reasonably clean and adequately supplied condition. Also, see **Section 5**.

6.18 SCAVENGING AND SALVAGING

The facility meets the following requirements:

(a) scavenging is prohibited.

(b) salvaging of materials, such as metal, paper, glass and cardboard is permitted as an integral part of the operation, subject to conditions established by the LEA, the local land use authority, or other approving agencies.

(c) salvaging activities are conducted in a planned and controlled manner as not to interfere with other aspects of site operation. Activities are conducted so as not to interfere with expeditious entry and exit of vehicles delivering waste to the transfer or processing operation or facility. Salvaging activities are confined to specified, clearly identified areas of the operation or facility, and controlled to prevent health, safety or nuisance problems.

(d) storage of materials salvaged from solid wastes is ancillary to the activities of the operation or facility unless such storage is planned as an integral part of the operation. Materials salvaged on-site are stored away from other activity areas in specified, clearly identifiable areas as noted in the Facility Plan or Transfer/Processing Report. They are arranged to minimize risk of fire, health and safety hazard, vector harborage, or other hazard or nuisance, and limited to a specified volume and/or duration as described in the Enforcement Agency Notification, Facility Plan, or Transfer/Processing Report.

Scavenging at the facility is not permitted and all facility employees are personally informed about the restriction. Only facility employees are allowed to carry out sorting/recycling activities in designated areas. Salvaging is allowed for specific items

depending on usefulness to the company. All salvaging activities are conducted in a planned manner so as not to interfere with other aspects of site operation. Salvaging activities are controlled to prevent health, safety and nuisance problems. Salvaged materials are stored in the designated containers and locations as depicted on the proposed site plan.

6.19 SIGNS

Because this operation is open to the public, there are easily visible sign at all public entrances indicating the name of the operator, the operator's telephone number, schedule of charges, hours of operation, and a listing of the general types of materials which either (1) WILL be accepted, or (2) WILL NOT be accepted.

6.20 LOAD CHECKING

The operator has implemented a load checking program to prevent the acceptance of waste which is prohibited by this Article. This program includes at a minimum:

(1) one random load check will be performed each day waste is received.

(2) storage of prohibited wastes removed during the load checking process will be in a hazardous waste locker as shown in **Figure 4**.

(3) records of load checks and the training of personnel in the recognition, proper handling, and disposition of prohibited waste. A copy of the load checking program and copies of the load checking records for the last year are maintained in the operating record and are available for review by the appropriate regulatory agencies.

6.21 PARKING

Onsite parking is provided for all employees, company vehicles and all users of the site. All collection and transfer trucks are provided by others and park off-site at other facilities.

6.22 SOLID WASTE REMOVAL

Solid waste is removed continually from the site on a first-in first-out policy and in all cases within 48 hours of receipt per State regulation. Generally, waste will be transferred from the facility within 24 hours.

6.23 SUPERVISION AND PERSONNEL

The operator provides adequate supervision and a sufficient number of qualified personnel to ensure proper operation of the facility in compliance with all applicable laws, regulations, permit conditions and other requirements. The operator will notify the LEA in writing of the name, address and telephone number of the operator or other person responsible for the operation. A copy of the written notification is placed in the operating record.

6.24 TRAINING

Personnel are adequately trained on subjects pertinent to site solid waste operations and maintenance, hazardous materials recognition and screening, use of mechanized equipment, environmental controls, emergency procedures and other requirements of the Minimum Standards for Solid Waste handling and Disposal. Training records are available for inspection.

6.25 VECTOR, BIRD, AND ANIMAL CONTROL

The facility takes adequate steps to control and prevent propagation, harborage and attraction of flies, rodents, and other vectors. Exterior litter is removed regularly from the site as part of standard facility housekeeping. Also, boxes, bins or other containers are cleaned regularly.

If there is a vector nuisance, appropriate measures are implemented, including the use of Western Exterminator, a licensed vector control contractor who comes monthly and on-call to inspect the facility.

6.26 RECORD KEEPING

The operator has and will continue to meet the following requirements:

a. Maintains records of incoming weights or volumes and outgoing salvage or residual weights or volumes in a form and manner approved by the LEA. Such records will be submitted to the LEA or CalRecycle upon request; will be adequate for overall planning and control purposes; and, will be as current and accurate as practicable.

b. All records required by this Article are kept by the operator in one location and accessible for three (3) years and will be available for inspection by the LEA and other duly authorized regulatory agencies during normal working hours.;

c. Submits copies of specified records to the LEA upon request or at a frequency approved by the LEA.

d. Maintains a daily log book or file of special occurrences encountered during operations and methods used to resolve problems arising from these events,

including details of all incidents that required implementing emergency procedures. Special occurrences shall include but are not limited to fires, injury and property damage, accidents, explosions, receipt or rejection of prohibited wastes, lack of sufficient number of personnel pursuant to section 17410.2, flooding, earthquake damage and other unusual occurrences. In addition, the operator will notify the LEA by telephone within 24 hours of all incidents requiring the implementation of emergency procedures, unless the LEA determines that a less immediate form of notification will be sufficient to protect public health and safety and the environment;

e. records any written public complaints received by the operator, including:

(1) the nature of the complaint,

(2) the date the complaint was received,

(3) if available, the name, address, and telephone number of the person or persons making the complaint, and

(4) any actions taken to respond to the complaint.

f. maintains a copy of the written notification to the LEA and local health agency of the name, address and telephone number of the operator or other person(s) responsible for the operations as required by section 17410.2.

g. maintains records of employee training as required by section 17410.3.

h. maintains records as required by section 18809 et seq.

Also see **Section 7**.

6.27 DOCUMENTATION OF LEA ACTIONS

The operator will maintain a record of LEA approvals, determinations, and other requirements.

6.28 COMMUNICATIONS EQUIPMENT

The facility has adequate communication equipment available to site personnel including 2-way radios and cell phones to allow quick response to emergencies. Also, see **Section 5**.

6.29 FIRE FIGHTING EQUIPMENT

The Facility has fire suppression equipment continuously available, properly maintained and located as required by the local fire authority. Also see **Section 5**.

6.30 HOUSEKEEPING

The operator provides adequate housekeeping for the maintenance of facility equipment and shall minimize accumulations of fuel drums, inoperable equipment, parts, tires, scrap, and similar items. Also, see the Station Maintenance portion of **Section 5**, as well as the earlier Litter Control portion of this section.

6.31 LIGHTING

The facility and/or equipment is equipped with adequate lighting, either through natural or artificial means, to ensure the ability to monitor incoming loads, effectiveness of operations, and public health, safety and the environment. Also see **Section 5**.

6.32 EQUIPMENT

The station will maintain the proper type, capacity, and number of equipment units to efficiently run the station according to the controls stipulated in this document and comply with the standards set forth in Articles 6.3 and 6.35. Also see **Section 5**.

6.33 SITE SECURITY

The facility is designed to discourage unauthorized access by persons and vehicles using fencing, walls and a security camera system.

6.34 SITE ATTENDANT

An attendant will be on duty during the hours the facility is open to the public.

6.35 TRAFFIC CONTROL

Traffic flow through the facility is controlled by the scale attendant, spotters, and facility supervisor to prevent the following:

(1) interference with or creation of a safety hazard on adjacent public streets or roads,
(2) on-site safety hazards, and
(3) interference with operations.

On-site traffic will be controlled by the following means:

- enforced speed limit of 5 mph
- tipping directions from scale house operator and spotters
- sufficient queuing space
- the controlled metering of trucks into the tipping areas as necessary by the site supervisor, traffic controller, or lead floor man

6.36 VISUAL SCREENING

An 8-ft foot tall solid wall surrounds the entire site and an eight-foot tall concrete block wall with a five-foot wide landscape strip is located along the Noakes Street. The MRF/transfer building provides additional screening of onsite operations from offsite views.

6.37 WATER SUPPLY

Potable water and sanitary sewer service are provided via the City of Los Angeles Department of Water and Power.

6.38 UNUSUAL PEAK LOADS

In the event of unusual peak loading, such as after a natural disaster, operations will be extended to a second or third shift, and stand-by equipment will be brought on-line, including loaders, forklifts, and transfer trailers. However, the maximum daily capacity of 500 tons will not be exceeded, unless given specific emergency approvals by the City and the LEA.

6.39 FINAL DISPOSAL

All waste material leaving the site will be sent to a permitted solid waste facility for further processing, transformation or disposal. If any waste transported from the site is denied at a landfill, the LEA shall be notified immediately

There is a rail spur on site, and it is possible that future operations may include rail haul of residual waste to distant landfills. However, this is not planned at the present.

7.0 RECORDS AND REPORTING

7.1 WEIGHT RECORDS

The facility records solid waste tonnage and number of hauling vehicles entering the facility per day. This includes daily averages and daily peaks for each calendar month. This information is reported per LEA instructions.

7.2 SPECIAL OCCURRENCES

A Special Occurrences Log is kept on a daily basis with a summary provided in the quarterly tonnage report. The log includes records of fires, explosions, injury and property damage accidents, flooding, and other unusual events, such as facility closure, with a brief description of the response to and resolution of each incident. The log also includes a record of loads rejected and visits by regulatory agencies.

Special occurrences are reported to the LEA within 24 hours.

7.3 HAZARDOUS WASTE LOAD CHECKING PROGRAM

A record is maintained of the results of the hazardous waste load checking program, including the quantities and types of hazardous wastes, medical wastes or otherwise prohibited wastes found in the waste stream and the disposition of these materials. Reports identifying loads rejected are included with the load check reports. See **Appendix B** for the complete Load Check Program and forms. This information is reported per LEA instructions.

7.4 COMPLAINTS

A record of all complaints regarding this facility is maintained along with the operator's actions taken to resolve these complaints. The LEA will be notified within 24 hours of any complaint received.

7.5 INSPECTION OF RECORDS

Facility records are kept in the Corporate office at 3720 Noakes Street and are available for inspection by contacting the facility operator between the hours of 9:00 a.m. and 4:45 p.m., Monday through Friday.

APPENDIX A

MATERIAL STORAGE CAPACITY CALCULATIONS

Material storage capacity calculations for each pile and bunker assume 1:1 side slopes and are based on the following formula:

$$Volume = \left(\text{Base Area} + \text{Top Area} + \sqrt{(\text{Base Area x Top Area})}\right) \text{x Height}/3$$

"Volume-to-Weight Conversion Factors" published by the U.S. Environmental Protection Agency Office of Resource Conversation and Recovery in April 2016, were used as the basis for these material storage capacity calculations and can be found at https://www.epa.gov/sites/production/files/2016-04/documents/volume_to_weight_conversion_factors_memorandum_04192016_508fnl.pdf. It is anticipated that if and when MSW is delivered to the facility it will be in compactor trucks and the material density can range between 400 lbs/cy to 700 lbs/cy per the EPA's conversion factors. Per the EPA, unprocessed CDI material has a density of 484 lbs/cy. All incoming material, with the exception of inert material loads (dirt, rock and concrete) will based on a density of 400 lbs/cy to reflect a worst-case scenario. Residual material density is based on the 300 lb/cy upper limit of the EPA's conversion factors.

DIRECT DISPOSAL CAPACITY CALCULATIONS - VERSION 3
CDI WITH 100 TPD MSW

$$Volume = \left(\text{Base Area} + \text{Top Area} + \sqrt{(\text{Base Area x Top Area})}\right) \text{x Height}/3$$

	MIXED WASTE BUNKER			CDI BUNKER	
B1	Pile Base Area (SF)	1,100.00	**B2**	Pile Base Area (SF)	3,600.00
	Pile Top Area (SF)	600.00		Pile Top Area (SF)	1,200.00
	Pile Height	14.00		Pile Height	14.00
	Base + Top	1700		Base + Top	4800
	Base x Top	660,000.00		Base x Top	4,320,000.00
	SQRT	812.40		SQRT	2,078.46
	Base + Top + SQRT	2512.4038404636		Base + Top + SQRT	6878.46096908265
	Pile Volume CF	11,724.55		Pile Volume CF	32,099.48
	Pile Volume CY	434.24		Pile Volume CY	1,188.87
	Material Density (Lbs/CY	484.00		Material Density (Lbs/CY)	484.00
	Material Storage (Tons)	105.09		Material Storage (Tons)	287.71

	PULLEY HEAD METAL BUNKER			SCREENED UNDERS BUNKER - 1/2"	
B3	Pile Base Area (SF)	310.00	**B4**	Pile Base Area (SF)	500.00
	Pile Top Area (SF)	120.00		Pile Top Area (SF)	360.00
	Pile Height	10.00		Pile Height	8.00
	Base + Top	430		Base + Top	860
	Base x Top	37,200.00		Base x Top	180,000.00
	SQRT	192.87		SQRT	424.26
	Base + Top + SQRT	622.873015219859		Base + Top + SQRT	1284.26406871193
	Pile Volume CF	2,076.24		Pile Volume CF	3,424.70
	Pile Volume CY	76.90		Pile Volume CY	126.84
	Material Density (Lbs/CY	1,000.00		Material Density (Lbs/CY)	1,000.00
	Material Storage (Tons)	38.45		Material Storage (Tons)	63.42

	SCREENED OVERS BUNKER (ADC) + 1/2"			Sort Line Bunker - Wood	
B5	Pile Base Area (SF)	700.00	**B6**	Pile Base Area (SF)	450.00
	Pile Top Area (SF)	360.00		Pile Top Area (SF)	430.00
	Pile Height	8.00		Pile Height	12.00
	Base + Top	1060		Base + Top	880
	Base x Top	252,000.00		Base x Top	193,500.00
	SQRT	502.00		SQRT	439.89
	Base + Top + SQRT	1561.99601592045		Base + Top + SQRT	1319.88634895846
	Pile Volume CF	4,165.32		Pile Volume CF	5,279.55
	Pile Volume CY	154.27		Pile Volume CY	195.54
	Material Density (Lbs/CY	1,000.00		Material Density (Lbs/CY)	169.00
	Material Storage (Tons)	77.14		Material Storage (Tons)	16.52

DIRECT DISPOSAL CAPACITY CALCULATIONS - VERSION 3
CDI WITH 100 TPD MSW

	Sort Line Bunker - Wood			Sort Line Bunker - Metal	
B7	Pile Base Area (SF)	450.00	**B8**	Pile Base Area (SF)	450.00
	Pile Top Area (SF)	430.00		Pile Top Area (SF)	430.00
	Pile Height	12.00		Pile Height	12.00
	Base + Top	880		Base + Top	880
	Base x Top	193,500.00		Base x Top	193,500.00
	SQRT	439.89		SQRT	439.89
	Base + Top + SQRT	1319.88634895846		Base + Top + SQRT	1319.88634895846
	Pile Volume CF	5,279.55		Pile Volume CF	5,279.55
	Pile Volume CY	195.54		Pile Volume CY	195.54
	Material Density (Lbs/CY	169.00		Material Density (Lbs/CY)	143.00
	Material Storage (Tons)	16.52		Material Storage (Tons)	13.98

	Sort Line Bunker - OCC			Sort Line Bunker - Plastic	
B9	Pile Base Area (SF)	450.00	**B10**	Pile Base Area (SF)	450.00
	Pile Top Area (SF)	430.00		Pile Top Area (SF)	430.00
	Pile Height	12.00		Pile Height	12.00
	Base + Top	880		Base + Top	880
	Base x Top	193,500.00		Base x Top	193,500.00
	SQRT	439.89		SQRT	439.89
	Base + Top + SQRT	1319.88634895846		Base + Top + SQRT	1319.88634895846
	Pile Volume CF	5,279.55		Pile Volume CF	5,279.55
	Pile Volume CY	195.54		Pile Volume CY	195.54
	Material Density (Lbs/CY	74.54		Material Density (Lbs/CY)	32.00
	Material Storage (Tons)	7.29		Material Storage (Tons)	3.13

	Sort Line Bunker - Drywall			RESIDUAL MATERIAL BUNKER	
B11	Pile Base Area (SF)	450.00	**B12**	Pile Base Area (SF)	600.00
	Pile Top Area (SF)	430.00		Pile Top Area (SF)	480.00
	Pile Height	12.00		Pile Height	12.00
	Base + Top	880		Base + Top	1080
	Base x Top	193,500.00		Base x Top	288,000.00
	SQRT	439.89		SQRT	536.66
	Base + Top + SQRT	1319.88634895846		Base + Top + SQRT	1616.65631459995
	Pile Volume CF	5,279.55		Pile Volume CF	6,466.63
	Pile Volume CY	195.54		Pile Volume CY	239.50
	Material Density (Lbs/CY	467.00		Material Density (Lbs/CY)	300.00
	Material Storage (Tons)	45.66		Material Storage (Tons)	35.93

DIRECT DISPOSAL CAPACITY CALCULATIONS - VERSION 3
CDI WITH 100 TPD MSW

	Inerts Bunker	
B13	Pile Base Area (SF)	600.00
	Pile Top Area (SF)	480.00
	Pile Height	12.00
	Base + Top	1080
	Base x Top	288,000.00
	SQRT	536.66
	Base + Top + SQRT	1616.65631459995
	Pile Volume CF	6,466.63
	Pile Volume CY	239.50
	Material Density (Lbs/CY	1,000.00
	Material Storage (Tons)	119.75

APPENDIX B

LOAD CHECK PROGRAM

DIRECT DISPOSAL MRF AND TRANSFER STATION

LOAD CHECK PROGRAM

A hazardous waste screening program will be implemented at the facility to make sure that no hazardous waste is brought to the facility, and to ensure that no hazardous waste is transferred to the landfill. The program will consist of the following elements:

I. Signage

Bi-lingual signs will be posted at the entrance of the facility stating that delivery of hazardous material is prohibited at the facility.

II. General Visual Inspection

As each load of waste is unloaded on the tipping floor, trained spotters will visually inspect each load for the presence of hazardous or suspicious materials to prevent and discourage disposal at the facility. A minimum of one trained spotter will be on duty at all times. Supervisors, equipment operators and sorters will also be trained and will perform continuous visual inspection to remove any suspicious materials. Discovered materials will be managed as described in Section VI.

The trained spotter working with the hazardous waste screening program will be HAZWHOPPER trained/certified. Training records are documented and kept onsite for review.

III. Random/Focused Load Inspection

A. Select a least one (1) loads per day.

B. Select them at different times during the day (Randomize selections for each inspection, for example Monday at 1:00 pm and Thursday at 9:00 am)

C. Select an equal share of roll-off and packer trucks.

D. Record date, time, truck and route number of selected load on the Load Check Inspection Record, **Attachment A**.

IV. Dumping Procedure

A. Dump selected trucks apart from the other haulers in a clean area of the tipping area.

B. Dumping area must be separated from the other site operations.

V. Sorting Procedure

A. Each load will be visually inspected by a trained spotter. The spotter is trained in the detection, handling, removal and storage of household hazardous wastes and known hazardous waste from the waste stream.

B. Loads will be spread out with loaders and hand rakes. Particular items such as drums, 5-gallon containers, electronic and universal wastes, wastes with DOT or other descriptive labels, sludges and liquids, soils and rags, and unidentifiable wastes suspected of being hazardous will be inspected and evaluated to determine whether the item is hazardous.

C. All containers large enough to contain other objects must be opened.

VI. Handling Suspected Hazardous Waste

A. If hazardous waste is found:

1. Questionable wastes are inspected by supervisory personnel, identified if possible, and verified as hazardous. Any questionable wastes which cannot be identified are assumed to be hazardous.

2. If the waste can be identified and it can safely be moved, it is transported to the Hazardous Waste Storage Area (HWSA) and placed in metal containers.

3. If the waste cannot be identified, but it can safely be moved, it is transported to the HWSA and segregated to await identification by trained agency personnel.

4. The driver of the vehicle delivering the waste will report to station management the collection route number or customer if the load was from a single generator. Every effort will be made to identify the generator of hazardous waste and any information regarding the generator of hazardous waste will be forwarded to the Los Angeles County District Attorney and the Highway Patrol.

5. Spills of hazardous waste will be contained as rapidly as possible with absorbent material and the area cordoned off. If this interferes with normal operations, all incoming vehicles will be directed away from the site.

6. If the spilled material is recognizable and is judged to be relatively non-toxic (e.g., motor oil) the absorbent material will be containerized and transported to the HWSA. Any employee engaged in clean-up operations will wear appropriate safety equipment.

7. If the spilled material cannot be immediately identified, the area will remain cordoned off until positive identification is made, thus ensuring safe handling and disposal. Asbury Environmental has been hired to be available on an emergency basis to clean up any major spills and to haul all hazardous material to a permitted disposal site.

B. Procedure for Handling Hazardous Waste

1. The person discovering the incident will immediately report the situation to their supervisor or the Site Manager.
2. If work area or building evacuation is necessary to ensure worker health and safety, the person discovering the incident, his/her supervisor, or the Site Manger will initiate evacuation procedures:
   a. Notify area personnel via intercom or loudspeaker to proceed to the nearest exit. Evacuation plans will be reviewed periodically.
   b. Personnel will proceed to the regrouping area at the entrance to the Direct Disposal storage and parking lot site at 3719 Noakes Street.
3. The Site Manger will designate an individual to interface with the emergency response agencies and an individual to assess personnel injures, if any, and conduct a head-count.
4. As soon as possible, the Site Manager, or his designee, will contact the Local Fire Department, Asbury Environmental, County HazMat Team, and/or the Police Department by **dialing 911**.
5. Only personnel who have received proper emergency response training will be allowed into the incident area, and only after donning appropriate personal protective equipment (PPE).
6. Personnel who are trained in spill control and fire response and who have the appropriate PPE will try to contain the incident under the direction of the Site Manager.
   a. If a large quantity of a hazardous chemical (>5 gallons) has been spilled, or a dangerous fire situation erupts, site personnel will <u>not</u> try to contain or control the situation. Site personnel will wait for local emergency response agencies to arrive.
      1. If a reportable quantity of material has been spilled, the Site Manger will also notify the:
         * DOT/EPA National Response Center at (800) 424-8802
           and
         * California Office of Emergency services at (800) 852-7550.
   b. If quantity of a hazardous chemical is less than 5 gallons and waste can be easily moved to storage area, the material will be temporarily set aside identifiable materials according to the following categories:
      * flammable and combustible
      * oxidizers
      * poisons
      * poisons containing heavy metals
      * corrosives (acids)
      * corrosives (bases)
7. Following containment and control of the incident, the Site Manager will complete the Special/Unusual Occurrence Report Form, Attachment B of this document.
8. Any hazardous material remaining on site overnight must be stored in the hazardous waste storage area.

C. Notification

Every hazardous waste occurrence will be documented. The following local agencies will be notified when any reportable quantity of hazardous or unidentifiable material is discovered at the facility.

Department of Building and Safety, Local Enforcement Agency Program, City of Los Angeles
(213) 252-3939

State Department of Health Services, Toxic Substances Control Program
(818) 567-3000

Health & HazMat Division, Los Angeles County
(323) 890-4045

If an investigation of the hazardous material generator seems warranted, call the Hazardous Material Investigative Unit of the California Highway Patrol at (916) 327-3310, and the County Department of Public Health.

D. Repeat offenders of hazardous waste from the same source will result in the termination of collection service for that business.

V. Packaging Procedures

A. Small containers of the same hazardous class can be packed in the same drum (lab packs).

B. All lab packs must contain enough absorbent material to contain liquids if there is a spill and prevent breakage. Vermiculite is approved packing material.

C. Steps:

1. Pack a few inches of absorbent material at bottom of the drum.
2. Pack more absorbent around each small container placed in the drum.
3. Drums for corrosive acid storage should be protected with plastic liner prior to adding absorbent and waste.
4. Each drum is to be assigned a number that is clearly marked on the drum body and lid.
5. Log sheets should be taped to the lid and should be marked as to: Facility location, drum number and hazard category.
6. Hazardous waste labels should be filled out and affixed to drum.
7. Affix proper hazard category label.

D. Packing compatibility:

1. Only chemically compatible materials can be packaged together. **DON'T MIX: ACID AND BASES, CYANIDE COMPOUNDS AND ACIDS, OXIDIZERS AND FLAMMABLE** (bleach is an oxidizer, though often marked poison).
2. If there is any doubt as to hazard class, call LA County Fire Department, HazMat Unit.

VI. Labeling and Record Keeping

A. Log Sheet: Enter the following information on a log sheet - to be used later to prepare manifest:
   1. waste category,
   2. list as much information about the chemical as possible (including the brand name),
   3. number of containers, and
   4. volume of weight of each container.

B. Manifest: Must be prepared if wastes are to be transported.

C. Training Records: Including Health and Safety Certifications.

D. Inspection Reports.

E. Spill or emergency incident reports.

VII. Storage Procedures

A. Lab packed drums are to be stored inside the main processing building, in a corner, to remain out of the way of any operations (must be stored on pavement).

B. Drums containing flammable, poisons, corrosives (bases) must be separated from drums with corrosives and oxidizers.

C. Containers must be closed except when being packed.

D. The temporary storage area of hazardous waste is to be fenced and secured and constructed with secondary containment.

E. Signs in English and Spanish posted around storage area(s) reading:

DANGER: HAZARDOUS WASTE STORAGE AREA.
ALL UNAUTHORIZED PERSONS KEEP OUT.
KEEP LOCKED WHEN NOT IN USE.

VIII. Disposal Procedures

A. Each lab pack must be inspected by a site supervisor experienced in waste identification and categorization before it is sealed.

B. Each sealed drum must be labeled as to hazard class (according to CFR 40 and 49).

C. Hazardous waste cannot accumulate for more than 90 days; otherwise, we must secure a permit.

D. Obtain an EPA ID# from the DTSC.

E. Manifest must be prepared if wastes are to be transported.

1. Prepare five copies:
    * Direct Disposal MRF and Transfer Station keeps two.
    * One copy to transporter.
    * Legible copy to Department of Public Health and Bureau of Sanitation within 30 days of each shipment.
2. Within 35 days of shipment, Direct Disposal MRF and Transfer Station must receive copies of manifest signed by the operator of the disposal facility. If not, Direct Disposal MRF and Transfer Station must contact the facility (if not received within 45 days, an exception report of the pertinent manifest and cover letter describing efforts made to locate shipment, must be submitted to the Department of Public Health).
3. Direct Disposal MRF and Transfer Station is to keep copies of manifests for three years.
4. Transporter - Only permitted haulers can transport hazardous wastes.

Attachment A

Direct Disposal MRF and Transfer Station

LOAD INSPECTION RECORD

Date and time:

Load checker name:

Collection Company:

Truck number:

Driver name:

Results of load check:

Description of hazardous material found (quantity, type, container, etc.):

_____
_____
_____
_____
_____
_____
_____
_____
_____

Disposition of material: (i.e. stored in the HWSA):

_____
_____
_____
_____
_____

Attachment B

Direct Disposal MRF and Transfer Station

SPECIAL/UNUSUAL OCCURRENCES REPORT FORM

Date_____

Name of employee completing report form

_____

Name of employee who discovered incident

_____

Type of Incident

___ Chemical spill
___ Personal injury
___ Fire
___ Earthquake
___ Unknown hazardous waste
___ Other_____

Description of incident_____

_____

_____

- Time_____
- Date_____
- Location_____
- Source_____

Chemicals involved_____

_____

Action taken_____

_____

Extent of injury (if any)_____

_____

Emergency equipment used_____

_____

Response Agencies notified_____

_____

Facility Manager's signature _____Date_____

APPENDIX C

LITTER CONTROL PROGRAM

DIRECT DISPOSAL MRF AND TRANSFER STATION
LITTER CONTROL PROGRAM

PURPOSE

To promote a clean environment through a Litter Control Program involves good house-keeping and requires all vehicles to properly cover (or tarp) their loads while traveling to and from the Facility in order to minimize the potential of litter on and around the property.

PROGRAM COMPONENTS

The four components of the Litter Control Program are:

1. TARPING REQUIREMENT
2. CONTAINMENT OF LITTER
3. SITE AND FACILITY CLEAN-UP
4. MONITORING AND RECORDING

Tarping Requirement

All loads entering the facility must be tarped or otherwise covered to control litter or other materials from escaping along any of the identified collection truck routes leading to the site. The following measures are implemented:

- A sign is posted at the entrance at each scale house, which states that all refuse loads (inbound and outbound) must be covered.
- All haulers/customers are initially given a copy of a printed notice stating the requirements of the Litter Control Program.
- Each incident of an uncovered load is logged by date, the customer's name and vehicle license numbers are documented.
- Repeat violators may be refused entry.

Containment Of Litter

Litter can be generated by activities at the facility (receipt and processing of wastes and recyclables) or from vehicles using the facility.

Facility Containment

Litter is controlled primarily by restricting waste unloading and processing operations to inside the processing buildings.

Vehicle Containment

Transfer Vehicles

Each transfer truck has screen coverings to prevent refuse from escaping the trailer while traveling to or from the landfill. After the transfer, vehicles are loaded, they move forward from the loading area. The vehicle driver will then properly place the covers over the load and remove any extraneous refuse from the vehicle, which might blow off while traveling. The driver will again inspect the truck for loose refuse before leaving the landfill.

Collection Vehicles

All vehicles arriving with uncovered loads are logged by date, their company name and vehicle license numbers in the Litter Control Reporting Log. Repeat offenders may be restricted from the facility.

Transport Vehicles

Vehicles removing materials will be visually inspected as they leave the station. Drivers of the vehicles having uncovered loads will be informed that they must cover their load before leaving the station. Violator's will be documented in the Litter Control Reporting Log. Repeat offenders may be restricted from entering the facility.

Site and Facility Clean Up

Dry sweeping and mechanical sweeping are used to clean and remove litter from the operating area and the surrounding area as well. The operating area and the remaining areas in the facility will be cleaned near the end of the operating day (approximately 5:00 p.m. - 6:00 p.m. Monday-Saturday). Entrances and exits are cleaned as needed to remove litter that could blow offsite.

Refuse deposited on the tipping floor is removed on a first in first out basis.

Roll-off boxes used for storage of recyclable materials, which may become contaminated by organic material, oil, or other liquids, will be thoroughly cleaned before re-use.

Monitoring and Recording

Scale house employees are trained in monitoring vehicles to ensure the loads are properly covered. Any loaded transfer or commercial vehicle entering or exiting the facility without proper covering will be asked to cover their load and the company name and vehicle numbers will be documented in the Litter Control Reporting Log. Repeat offenders may be restricted from entering the facility.

All records are stored in the administrative office and available for inspection by an authorized inspector upon request.

Direct Disposal MRF AND TRANSFER STATION

LITTER CONTROL REPORTING LOG

DATE & TIME	COMPANY NAME	VEHICLE LICENSE NO.	COMMENTS

APPENDIX D

CAPSULE RESUMES

Daniel Agajanian has a Master of Arts Degree in Biology from the University of California Riverside and has over 34 years of experience in the waste management industry. He started as a part time driver with Angelus Hudson Inc. a medium sized refuse hauling and recycling company located in Los Angeles. He worked his way up the ladder to become not only the president of that company but also a shareholder. As president he managed the day to day operation of that company and started many recycling programs for his customers. Daniel was the past president of the California Waste & Recycling Association and is now on the Board of Directors. Daniel is responsible for the day to day operation of Direct Disposal along with its recycling facility.

Tamara Agajanian is responsible for accounts payable, payroll, and accounts receivable.

Angie Acosta is responsible for office management and dispatching the roll-off drivers weighing trucks in and out of Direct Disposals C&D recycling Facility.

Victor Luna has been with Direct Disposal since 2003 and is responsible for the day to day operation of Direct Disposal's Recycling facility. His responsibilities are, weighing in and out all vehicles directing all sorters and loader operators. He had worked with Quality Paper as a sorter and wheel loader operator.

APPENDIX E

ALTERNATIVE ODOR MANAGEMENT PLAN

Direct Disposal MRF AND TRANSFER STATION

ALTERNATIVE ODOR MANAGEMENT PLAN

July 2020

Introduction

This Alternative Odor Management Plan (AOMP) has been prepared in accordance with South Coast Air Quality Management District (SCAQMD) Rule 410. This plan will be posted in both the scalehouse and the office so as to be clearly visible to operations and inspection personnel. It will be made available to the SCAQMD Executive Officer upon request.

Site Name:	Direct Disposal Material Recovery Facility (MRF) and Transfer Station
SWIS#:	19-AR-1228
Location:	3720 Noakes Street, Los Angeles, CA, 90023
Permit:	Large Volume Solid Waste Facility Permit
Operation:	Construction Demolition Inert debris (CDI) and mixed Municipal Solid Waste (MSW), received, transfer/processed, temporarily stored, and then delivered to other permitted processing or disposal facilities. Maximum 500 tons per day (TPD) 1-acre active operating area

Community Coordinator:	Dan Agajanian
***Phone number*:**	(323) 262-1604
***Mailing address*:**	3720 Noakes Street Los Angeles, CA 90023

Direct Disposal MRF and Transfer Station (Direct Disposal) functions as a large volume CDI/MSW transfer station and processing facility. The facility is located at 2720 Noakes Street in the City of Los Angeles, and is situated in an industrial zone, surrounded by compatible land use.

Direct Disposal is permitted to receive approximately 500 tons per day (TPD) of material. CDI material will be floor sorted, screened and processed over a sort line. MSW, which is limited to a maximum of 100 TPD will be temporarily stored in a bunker and transferred

within 24 to 48 hours on a first in first out basis. Material will be received, hand sorted, temporarily stored, loaded into transfer trucks and then delivered to other processing facilities or permitted landfills.

The facility will be permitted to operate 24 hours/day, 7 days/week.

CONTENT ELEMENTS

1. Housekeeping Activities

a. *Tipping Floors*
Materials received at the facility are tipped in one of two bunkers depending on the type of material. One bunker is for one is for receiving MSW and the second is for C&D.

Litter is removed from in and around this area daily by a mechanical sweeper, and/or by hand with brooms. The equipment is also cleaned at the end of each day by wiping down to remove dirt and dust. Detergents are not used.

b. *Transfer Tunnel*
There is no transfer tunnel.

c. *Other Areas*
Litter crews police the site daily, including the access and egress points to collect litter and debris, and a mechanical street sweeper cleans all paved areas, driveways, and the frontage sections of Noakes Street each day.

All housekeeping activities are documented in a daily record.

2. Community Response Procedures

a. *Contact Sign*
On the facility gate, within 50 feet of the main entrance, there is a sign with contact information for the facility, SCAQMD, and the local enforcement agency (LEA). The sign is at least 48 inches wide by 48 inches tall and the lettering is at least 4 inches tall. The text contrasts with the sign background for proper legibility. The lower edge of the sign is located between six and eight feet above grade. See **Attachment A** for a drawing of the sign.

b. *Community Coordinator*
At Direct Disposal the community coordinator is Dan Agajanian, (323) 262-1604.

c. *Complaint Response Protocol*
Direct Disposal staff will follow the complaint response protocol when an odor complaint is received by the facility or when notified by the SCAQMD or the LEA that an odor complaint has been received for the facility. If an odor complaint is received, Direct Disposal staff will go to the location of the odor complaint to verify the presence and intensity of the odors. If the odor can be detected at the complainant's home or business, Direct Disposal staff will trace the odor by conducting odor checks around the general vicinity. If the odor was determined to be generated offsite, Direct Disposal staff will contact the complainant notifying them of the source of the odors. If, however, Direct Disposal staff determines that the odor is generated by the facility, they will immediately identify the source of the odor and mitigate.

All odor complaints will be logged in a separate complaint or odor complaint log, and the LEA will be notified within 24 hours. Odor complaints will be logged on a pre-printed form that has entry areas for the appropriate information. All complaints will be logged as to the time, date, location, ambient air temperature, cloud cover, wind direction and speed, and nature of complaint. See **Attachment B** for a sample of the Odor Complaint Form.

If the facility receives more than three different complaints within a one-month period or two complaints from the same individual within a one-month period, staff will meet with the LEA and the complainant (if possible) within a reasonable time to discuss the source of the odor and discuss operational changes that would minimize odors in the future.

The presence of odor is also monitored at the site's east, west, north, and south boundaries prior to commencing and closing daily operations. The level of offensiveness from on-site odors at the property boundary is based on a scale of 1 to 6 as follows:

1. No Odor
2. Very Faint
3. Faint
4. Distinct
5. Strong
6. Very Strong

Should an odor problem occur at a level 3 or above, the following steps will be taken:

- Identify the source of the odor
- Determine possible cause(s) and select remedial action
- In the event the odors cannot be controlled by any of the remedies, the odorous material will be trucked to the landfill.

Should odors increase or a complaint be verified, the plan will be re-evaluated and more provisions will be considered to monitor or minimize odors.

d. *Complaint Log*

The facility keeps a written log of all complaints. The log is available for review at the site office located at 3720 Noakes Street, Los Angeles, CA 90023.

e. *Odor Survey Procedures*

If an odor complaint is received by the facility, or when the LEA is notified that an odor complaint has been received for the facility, a facility representative conducts an odor survey of the surrounding community as soon as practical but does not exceed two hours after receiving the complaint, or notification. The survey is conducted in a complete radius at no less than four locations around the facility and extends outward as far as odors are detected. The facility's Odor Complaint Form (see **Attachment B**) is used to document the survey.

CONTROL STRATEGIES

Design Considerations for Minimizing Odors

In order to minimize the development of conditions that could lead to odor problems, the material handling areas of the site were designed based on the nature and quantity of materials to be received and stored, climatological factors, adjacent land use, grading, and drainage controls.

Facility Design

Inside the designated transfer and processing area there are three tipping areas and storage bunkers.

Waste storage is minimized by implementing a "first-in, first-out" policy. In accordance with State law, no waste is stored onsite longer than 48 hours. The facility does not anticipate waste storage for this extended amount of time. Generally, waste will be transferred from the facility within 24 hours.

Material on the tipping floor will either be transferred from the site or stored in roll-offs by 8:00 p.m. each day, unless an emergency occurs. In any case, waste will not be stored onsite longer than 48 hours.

Meteorological Conditions

The facility is located in a benign area concerning meteorological events. The location experiences very little rain and prevailing winds blow in from the southwest. This is directly away from the sensitive residential receptors. See **Attachment C** for the wind rose from the Los Angeles International Airport.

In addition, the temperature of the location is mild throughout the year. During Santa Ana wind episodes, the winds shift out of the east and can blow at high velocities (above 25 mph). Facility operations are not significantly affected by the wind as all activity is conducted in a fully-enclosed building.

Odor Sources

The potential source of odor at the Direct Disposal MRF and Transfer Station would be the tipping floors and storage areas.

The tipping floors and storage bunker areas for MSW and unprocessed CDI are located inside a building which contains any odors and shields material from wind thereby minimizing odor travel.

To further minimize dust and provide odor suppression, an overhead misting system is located over the tipping and load out areas.

An overhead misting system moistens loads when tipped, during processing and during loadout to reduce the amount of dust generated onsite. Any odor issues can be addressed by adding an odor neutralizer into the misting system.

Protocol for Handling Odiferous Loads

All incoming loads are checked for obsessive odor. Such loads are rejected at the scalehouse. Should odiferous material be found in the tipping areas, it will be immediately sprayed with a handheld deodorizer and loaded out in the next transfer truck leaving the site.

Covering Trucks and Trailers

All roll-offs are fully tarped prior to exiting the facility. In addition, if they are filled after the landfill closes they are covered at night with tarps, to minimize odor.

SUPPLEMENTARY CONTENT ELEMENTS

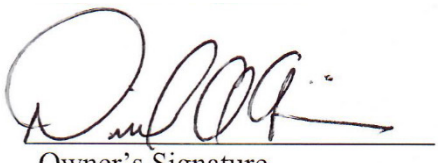
Buffer Zone

The Direct Disposal site is located in a M3-1 (heavy industrial) zone and is surrounded by compatible industrial land uses. Surrounding properties consist of a mix of heavy industrial and warehouse uses. A mill, garment manufacturing facility, and a warehouse are located to north of the site across Noakes Street, a Union Pacific Railway freight yard is located to the south within the City of Vernon, a printing facility occupies the property to the east, and a wholesale distribution warehouse is located to the west.

The facility is located more than 1,000 feet from property zoned for residential and mixed land uses.

ENFORCEABILITY

"I am voluntarily submitting this Alternative Odor Management Plan to the Local Enforcement Agency in lieu of submitting an Odor Management Plan to the South Coast Quality Management District as required by the South Coast Air Quality Management District Rule 410. I agree to abide by the provision of the Alternative Odor Management Plan and understand that the Alternative Odor Management Plan is subject to enforcement by the Local Enforcement Agency. I understand that I must comply with any or all applicable state statutes and federal and local rules and regulation, including those provisions relating to public nuisance."

Dan Agajanian		7/15/2020
Owner's Name (Print)	Owner's Signature	Date

Attachment A

For questions and complaints call:

DAN AGAJANIAN
FACILITY MANAGER
(323) 262-1604

LOCAL ENFORCEMENT AGENCY
(213) 252-3939

AIR QUALITY MANAGEMENT DISTRICT
24 HOUR LINE
(909) 396-2000

Attachment B

ODOR COMPLAINT FORM

A - Name

_____ _____
Name Telephone Number

_____ _____
Address E-mail Address

_____ _____
Signature Date

B - General Where were you when you smelled the odor?

_____
Location

_____ am/pm _____ hours _____ minutes
Time Duration

C - Intensity Rating
Check the appropriate boxes

Intensity Scale Choose one

1	2	3	4	5	6
☐	☐	☐	☐	☐	☐
No Odor	Very Faint	Faint	Distinct	Strong	Very Strong

D - Odor Description
Check the appropriate boxes

☐ Ammonia	☐ Woody	☐ Fishy	☐ Rotten Egg
☐ Decaying Grass	☐ Turpentine	☐ Chemical/solvent	☐ Manure
☐ Earthy/Moldy/Musty	☐ Sewer/Sewage-like	☐ Burnt/ Smoky	☐ Other _____

E - Weather Conditions
Check the appropriate boxes

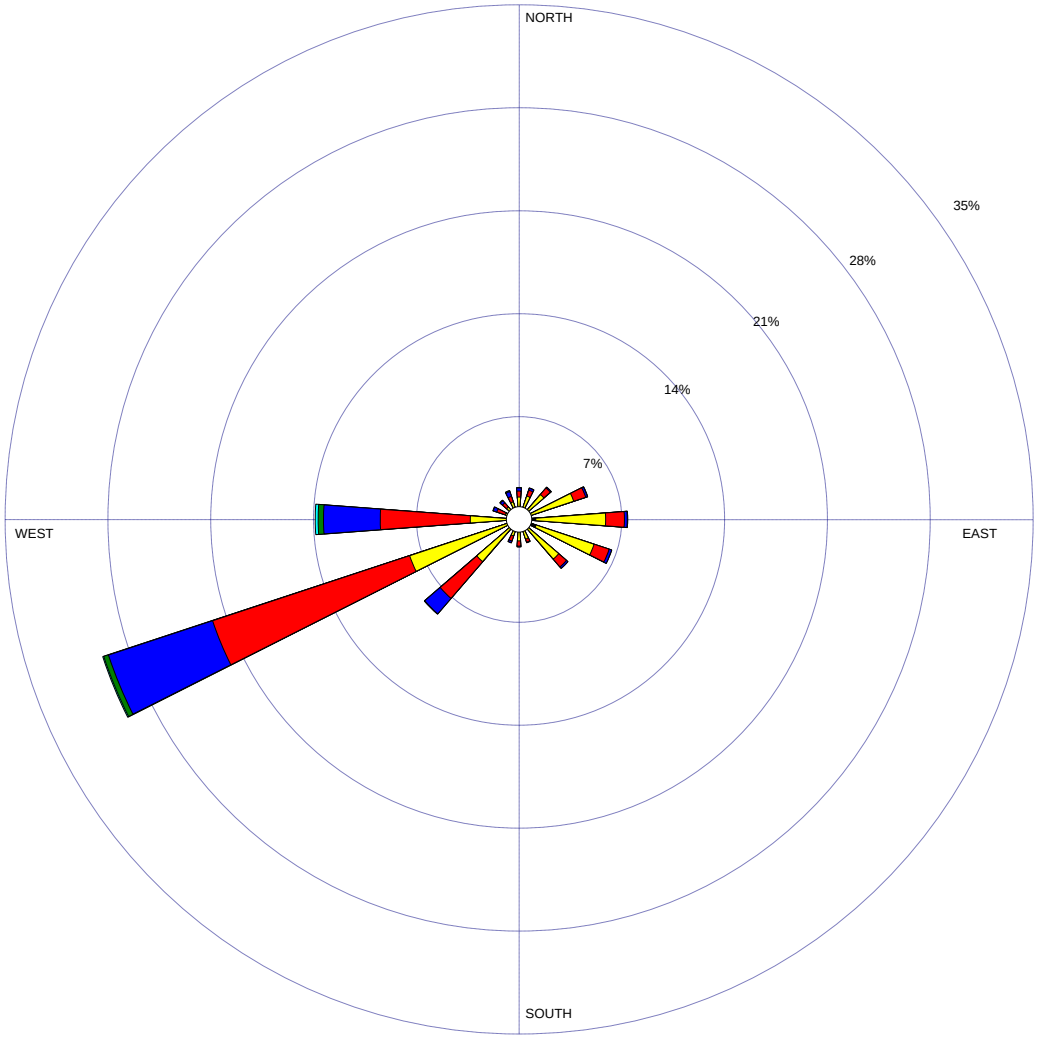
☐ Sunny	☐ Calm	☐ Strong Wind (15 + mph)
☐ Overcast	☐ Humid	☐ Light Breeze (1-5 mph)*
☐ Temperature _____	☐ Moderate Wind (5-15 mph)*	☐ Wind Direction _____

*If you checked this box, please provide wind direction in check boxes below:

F - Compliant taken by: _____
Name

WIND ROSE PLOT

Station #23174 - LOS ANGELES/INT'L ARPT, CA 1985-1989



Wind Speed (m/s)

- > 11.06
- 8.49 - 11.06
- 5.40 - 8.49
- 3.34 - 5.40
- 1.80 - 3.34
- 0.51 - 1.80

MODELER	DATE **5/28/2003**	COMPANY NAME	
DISPLAY **Wind Speed**	UNIT **m/s**	COMMENTS	
AVG. WIND SPEED **3.75 m/s**	CALM WINDS **6.11%**		
ORIENTATION **Direction (blowing from)**	PLOT YEAR-DATE-TIME **1985** **Jan 1 - Dec 31** **Midnight - 11 PM**	PROJECT/PLOT NO. **1985-1989**	

WRPLOT View 3.5 by Lakes Environmental Software - www.lakes-environmental.com

APPENDIX F

SAFETY COMPLIANCE REPORT

SAFETY INSPECTION REPORT

The purpose of this report is to help you identify and correct unsafe work practices (acts) and conditions before an accident occurs. Begin each inspection by making safety observations. Then, conduct a thorough inspection utilizing the checklist. Be sure to follow up on all items that need action.

Use the space below for general safety observations. Look for unsafe behaviors and note them here. Remember, more than 80% of all accidents are caused by personnel who practice unsafe acts. When unsafe acts are observed, the situation should be corrected immediately.

	Administrative:	O.K.	Action Needed	Comments/Abatement/Date
A.	OSHA Poster conspicuously displayed.	☐	☐	
B.	OSHA recordkeeping requirements met.	☐	☐	
C.	Workers trained prior to new or unfamiliar tasks.	☐	☐	
	Material Handling:			
A.	Employees trained in proper lifting methods.	☐	☐	
B.	Equipment provided for heavy or awkward loads.	☐	☐	
C.	Materials stored to prevent over-reaching.	☐	☐	
	Housekeeping:			
A.	Walkways clear of obstructions.	☐	☐	
B.	Employees clean up as they go.	☐	☐	
	Floors:			
A.	Walking and working surfaces kept clear.	☐	☐	
B.	Spilled materials cleaned up immediately.	☐	☐	
C.	Holes in floor repaired or covered.	☐	☐	
	Machinery and Equipment:			
A.	Moving parts guarded.	☐	☐	

B.	**Kept in safe operating condition.**	☐	☐	_____
C.	**Operated and inspected per mfg. instructions.**	☐	☐	

_____

	Hand Tools:	**O.K.**	**Needed**	**Action Comments**
A.	**Always inspected before using.**	☐	☐	_____
B.	**Only used for intended purpose.**	☐	☐	_____
C.	**Damaged tools repaired or replaced promptly.**	☐	☐	

_____

	Stairs:			
A.	**Lighting adequate.**	☐	☐	

_____

B.	**Non-slip surface.**	☐	☐	_____
C.	**Handrails secure.**	☐	☐	

_____

	Ladders:			
A.	**Proper type for intended use.**	☐	☐	_____
B.	**Maintained in good condition.**	☐	☐	_____
C.	**Proper ladders used instead of chairs, boxes, etc.**	☐	☐	_____

	First Aid:			
A.	**Fully stocked First Aid kit.**	☐	☐	_____
B.	**Emergency telephone numbers posted.**	☐	☐	_____
C.	**At least one person trained in First Aid.**	☐	☐	_____

	Emergency Action Plan:			
A.	**Written; covers fire and other emergencies.**	☐	☐	_____
B.	**Communicated to all employees.**	☐	☐	_____
C.	**Employees designated and trained to implement plan.**	☐	☐	_____

	Fire Protection:			
A.	**Firefighting equipment is serviced and accessible.**	☐	☐	_____
B.	**Employees instructed in use of firefighting equip.**	☐	☐	_____
C.	**Employees instructed in fire protection procedures.**	☐	☐	_____

	Egress:			
A.	**Exits clearly marked.**	☐	☐	_____
B.	**Exits accessible.**	☐	☐	_____
C.	**Exit doors unlocked.**	☐	☐	_____

	Electrical:			
A.	**All equipment either grounded or double insulated.**	☐	☐	_____
B.	**Extension cords in good repair.**	☐	☐	_____
C.	**At least 36” clearance around control panels.**	☐	☐	_____

	Personal Protective Equipment:			
A.	**Proper equipment in use where needed.**	☐	☐	_____
B.	**Properly maintained and stored.**	☐	☐	_____
C.	**Employees trained in proper usage.**	☐	☐	_____

	Health Hazards:			
A.	**Hazard communication program in place.**	☐	☐	_____

B. Hazardous materials stored and used properly. ☐ ☐

C. Warning and identification sign clearly posted. ☐ ☐

Use this space to list additional items specific to your operation. Use an additional sheet to continue your list if you run out of space.

	O.K.	Action Needed	Comments
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
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	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	

Conducted by: _____

Date: _____

Reviewed by: _____

Date: _____

APPENDIX G

INJURY AND ILLNESS PREVENTION PROGRAM

July 2020

Direct Disposal
MANAGEMENT POLICY STATEMENT

To All Employees:

As President, I accept responsibility for overall safety and health in our operations. Victor Luna and Angie Acosta will be responsible to me and have the authority to implement and maintain our safety program.

All management is responsible for leadership of the safety and health program, for its effectiveness and improvement and for providing the safeguards required to insure safe conditions.

Supervisors are responsible for insuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.

Employees are responsible for wholehearted, genuine cooperation with all aspects of the safety and health program and for continuously practicing safety while performing their duties.

COMPANY POLICY FOR INJURIES

The State of California, under the Labor Code, has enacted specific rules that cover the care and treatment of employees who have been injured on the job. There was great concern about how work injuries would be treated, so the state made all work-related injuries NO FAULT in nature. What this means is that if you are injured on the job:

- Your medical bills will be paid;
- You will receive Temporary Pay if you are unable to work; and
- You will receive payments as set by the state for any Permanent Disability you may suffer as a result of that injury. You will be retrained in another occupation if you cannot return to your regular employment.

On January l, 1990, the state enacted new rules designed to further protect you. These rules state that if you are injured on the job, your employer must provide you with a claim form that lets the employer know that there has been an injury and explains to you just what benefits are potentially available to you.

In order that we at Direct Disposal do the very best job to ensure that you receive all benefits due to you in the event you are injured on the job. We have developed the following set of rules that cover all instances where there has been an actual, or even

possible, injury. And since the law is very specific, you must even report minor or First Aid injuries.

What must be done in case of an injury?

I)All injuries, no matter how small, must be REPORTED IMMEDIATELY, Labor code 5400 says "No claim to recover compensation... shall be maintained unless...there is served upon the employer notice in writing, signed by the person injured.

Normally, you have several days to report an injury. However, because we are so concerned about your safety and wellbeing, we have decided to set our policy so that EVERY INJURY MUST BE REPORTED IMMEDIATELY,

With this policy, we are assured that you will receive both proper treatment and all of the information required regarding your rights.

PLEASE NOTE: YOUR FAILURE TO FOLLOW THIS POLICY WILL BE CONSIDERED A VIOLATION OF COMPANY RULES AND YOU WILL BE SUBJECT TO DISCIPLINARY ACTION.

This policy IS NOT INTENDED TO SCARE YOU, but rather to let you know that we are concerned about you and want to make sure that all injuries are reported and treated in a timely manner.

When you report the injury, you will be given a copy of the state claim form called the DWC 1. It lets us know what happened and when it occurred. It also gives you information about the benefits that are available to you should the injury prove to be serious.

To ensure that all benefits are provided to you in a timely manner, this form MUST be filled out and returned to us immediately, and in no event later than three (3) working days after the form has been given to you.

Again, as in the case of reporting the injury, your wellbeing is of utmost importance to us. By your returning the form to us, we can ensure that any benefits such as medical or disability payments can begin.

PLEASE NOTE: As with reporting injuries, failure to return the DWC-I form is also a violation of our policy and will subject you to possible disciplinary action.

Above all, please remember that safety is EVERYONES JOB. However, we all know that no matter how careful we are, there will still be occasional injuries. We therefore need to know about every injury, no matter how small, so that it will be treated properly and you will receive any benefits you are legally entitled to.

Your services are of value to us and we want you to be assured that all that can be done for you will be done in case you are injured on the job. However, we cannot do our job well if you don't do yours, so please remember.

- IMMEDIATELY REPORT ALL INJURIES, NO MATTER HOW SMALL, TO YOUR SUPERVISOR OR PERSONNEL.

- RETURN THE DWC-I CLAIM FORM TO YOUR SUPERVISOR OR PERSONNEL AS SOON AS POSSIBLE, BUT IN NO EVENT, NO LATER THAN THREE (3) WORKING DAYS AFTER YOU HAVE BEEN GIVEN THE FORM.

Please be sure to contact your Supervisor or Personnel Department if you have any questions regarding this company policy.

Local Clinic: Alameda Industrial Clinic

Address: 1907 East Washington Blvd.
Los Angeles Ca. 90021

Telephone: (213) 747-7667

Hospital: White Memorial Hospital

Address: 1720 East Cesar Chavez Blvd.
Los Angeles Ca 90033

Telephone: (323)268-5000

Signature

_____

Date

_____

Direct Disposal

IDENTIFICATION OF PLAN ADMINISTRATORS

The following person(s) responsible for implementing the accident prevention plan for Direct Disposal.

NAME	TITLE
Angie Acosta	Safety Coordinator
Victor Luna	Floor Supervisor

RESPONSIBILITIES

MANAGERS:

In effectively executing their safety responsibilities, managers will:

1. Familiarize themselves with the safety program and insure its effective implementation;

2. Be aware of all safety considerations when introducing a new process, procedure, machine or material to the workplace;

3. Give maximum support to all programs and committees whose function is to promote safety and health;

4. Actively participate in safety committees, as required; and

5. Review serious accidents to ensure that proper reports are completed and appropriate action is taken to prevent repetition.

SUPERVISORS:

Our supervisors are the foundation of the safety program. Their responsibilities are to:

1) Familiarize themselves with company safety policies, programs and procedures; 2) Provide complete safety training employees prior to the assignment of duties; to employees prior to the assignment of duties; 3) Consistently and fairly enforce all company safety rules 4) Investigate injuries to determine cause, then act to prevent repetition; 5)See that all injuries, no matter how minor, are treated immediately and referred to the personnel office to insure prompt reporting to the insurance carrier; and, 6)

Inspect work areas often to detect unsafe conditions and work practices. Utilize required company self-inspection checklists to achieve this.

EMPLOYEES:

Employee responsibilities for safety include the following:

1)Adhere to all safety rules and regulations;

2) Wear appropriate safety equipment as required;

3)Maintain equipment in good condition, with all safety guards in place when in operation;

4)Report all injuries, no matter how minor, immediately to a supervisor,

5)Encourage co-workers to work safely; and

6) Report unsafe acts and conditions to the supervisor.

Signature_____

Date_____

SAFETY RULES

For the protection and safety of all employees, Direct Disposal has established the following rules designed to prevent accidents and injuries.

Compliance with these rules is mandatory. Documentation will be provided when the rules are distributed to new employees;

l) Proper footwear and clothing will be worn at all times.

2) Do not wear loose clothing or jewelry. Keep long hair in a down position when there is a danger of catching such articles in moving machinery.

3) Horseplay, running, fighting or any activity that may result in injury or waste will not be tolerated.

4) Eye protection is required when performing any task that could produce flying particles.

5) Operate machinery with all guards in place. Tampering with safety devices is cause for immediate disciplinary action.

6) Do not operate any machine with which you are not familiar with.

7) Machines must never be cleaned, adjusted or repaired until after the machine is turned off, the circuit is broken at the power source (including lockout) and a warning tag is placed at the controls. Each person involved in maintenance must have his/her own personal padlock to insure total lack of power until all work has been completed.

8) Any defects in materials, machinery, tools and equipment must be reported immediately to a supervisor.

9) Do not leave tools, materials or other objects on the floor that might cause others to trip and fall.

10) Do not block exits, fire doors, aisles, fire extinguishers, gas meters, electrical panels or traffic lanes.

11) Avoid risk of rupture, internal injury or back injury in attempting to lift or push excessive loads. If any object is too heavy to move without strain ASK FOR HELP.

12) Observe the correct position for lifting. Stand with your feet slightly apart; assume a squatting position with knees bent and tuck your chin. Tilt head forward, grasp the load with both hands and gradually push up with your legs, keeping your back straight and avoiding any abrupt movement.

13) Do not distract others while working. When approaching a machine operator for any purpose, do so from the front or the side in a way that he or she will see you coming and will not be shocked or surprised. If conversation is necessary, first make sure the machine is turned off.

14) Do not allow oil, wax, water or any other material to remain on the floor where you or others may slip. Report any spills to your supervisor.

15) When handling hazardous materials, insure that you follow prescribed safety procedures and use required safety equipment. When using secondary containers filled by others, insure that they are labeled as to their contents and hazards.

16) Use appropriate gloves when handling materials with sharp or jagged edges that may result in lacerations.

17) Do not attempt to operate machinery for which you are not trained.

18) Unnecessary and excessive haste is the cause of many accidents. Exercise caution at all times. WALK, DO NOT RUN!

19) The use of hot production equipment or materials for the purpose of cooking or heating food is strictly prohibited.

20) All work-related injuries and accidents, no matter how minor, must be reported immediately to your supervisor.

It is imperative that all employees become thoroughly familiar with the above safety rules. Failure to comply with safety rules or procedures, or failure to wear the appropriate safety equipment, will result in disciplinary action up to and including termination.

Signature_____

GUIDE" SAFE PRACTICES AND OPERATIONS CODE"

ATTENTION CONTRACTORS THE CAL/OSHA CONSTRUCTION SAFETY ORDERS REQUIRE THE POSTING OF A "SAFE PRACTICES AND OPERATIONS CODE" AT ALL JOB SITES. THE FOLLOWING CAN BE USED AS A GUIDE.

GENERAL:

1) Hazardous machinery, equipment or conditions and unsafe practices or acts shall be reported to your foreman at once;

2) The use of, or possession, of intoxicating beverages is prohibited on the job. Reporting to work intoxicated warrants immediate dismissal;

3) Caution other employees exposed to hazards created by your work activities;

4) All injuries shall be reported promptly to an authorized representative so that arrangements can be made for medical or first aid treatment;

5) Authorization for medical services must be given by a foreman for "On the Job" injuries before obtaining medical attention or seeing a doctor;

6) Do not engage in horseplay on the job;

7) Warning signs, barricades, guardrails, etc., shall be kept in place;

8) Place guards around or over all roof openings, floor openings, excavations, open manholes, elevator shafts or any other opening where there is a hazard of falling, etc.;

9) Machinery and equipment shall be operated or repaired by qualified personnel only;

10) Keep out of hazardous areas when not a member of the work crew involved;

11) Always use the proper lifting technique to prevent back strain and injury; and

12) Do not enter manholes, underground vaults, chambers, tanks, silos, etc., until it has been determined that there is a sufficient amount of air and that it contains no flammable or toxic gases or vapors.

PERSONAL PROTECTIVE EQUIPMENT:

l) Hard hats shall be worn where there is a hazard from falling or flying materials.

2) Wear proper footwear with substantial soles.

3) Wear appropriate dark goggles or welding helmet when working on or near arc, acetylene welding or burning.

4) Wear safety glasses or a face shield in areas where flying particles are encountered or hot material can splash.

5) Protection for the hands and other parts of the body is required when exposed to cuts, burns or harmful substances.

6) Use safety belts and lifelines when working at heights or where unprotected by guardrails or safety nets.

7) Flag men, truck spotters, grade checkers, etc. shall wear orange shirts or vests and use proper warning signs, and flags.

LADDERS AND SCAFFOLDS:

l) Defective ladders shall not be used.

2) When using ladders other than stepladders, set feet securely and tie off at the top.

3) Face the ladder going up or down and keep hands free of tools or materials.

4) Before using a scaffold, check proper blocking, bracing ties, guardrails and planking. If defective, do not use until corrected.

5) Scaffold platforms shall be kept clear of unnecessary tools or material. Do not overload.

6) Scaffolds or platforms 7 .1/2 feet or more above ground shall be equipped with guardrails and toe boards.

7) Before working on scaffolds, check braces, guys, wheel retainers, wheel locks and outriggers.

MACHINERY AND EQUIPMENT:

1) Oiling or repairing of machinery or equipment while in motion is prohibited unless special provision to do so safely has been provided.

2) Before any equipment is set in motion, operator must first check and be certain that no one will be injured by the operator's action.

3) No employee shall be allowed to operate power-driven equipment until he has proven that he understands the safe practices of operation.

4) Operators of power-drive equipment shall make a careful inspection of the equipment at the start and end of each shift. Any changes or defects must be reported to both his relief and foreman.

5) Before leaving motorized equipment, ground the blade, bucket, scoop, pans, etc., and secure brakes.

6) Motorized equipment should be handled with caution in dangerous areas such as edges of deep fills, cut banks and steep slopes.

7) When making repairs on equipment where blocking is required, be sure blocking is secure.

8) Keep proper clearance from all high voltage lines.

9) Never swing suspended loads over workmen.

10) Getting on or off equipment while it is in motion is prohibited.

11) Riding equipment is prohibited unless the equipment is provided with adequate riding facilities.

HAND TOOLS:

1) Defective tools shall not be used. Keep all tools in good state of repair.

2) Do not carry sharp hand tools in clothing. Use proper carrying cases or tool kits.

3) Use hand tools only for the purpose for which they are intended.

4) Power actuated tools shall only be used by qualified operators.

ELECTRICAL:

1) Check all portable electric tools for ground and condition of cords. Do not use if defective. Report defective equipment to your supervisor.

2) Heed high voltage warning signs and keep proper distance

3) Do not lift or lower portable electric tools by means of the power cord. Use a rope.

4) Do not leave the cords of portable electrical tools where equipment will run over them.

5) When necessary to suspend portable power tools, hang them from some stable object by means of a rope or similar support of adequate strength.

FIRST AID:

1) Obtain immediate first-aid for all injuries, no matter how small, and report immediately to your supervisor.

2) Know location of first-aid kits and emergency equipment.

3) Do not move a seriously injured person unless the person is exposed to further injury from fire, falling objects or other hazards. Never remove foreign bodies from the eyes.

4) Use first-aid materials for emergency only.

FIRE HAZARDS:

1) When welding or cutting, be sure that hot sparks or slag does not come in contact with combustibles.

2) Use only closed metal containers labeled FLAMMABLE for storage of flammable liquids.

3) Keep oily rags and waste material in proper containers.

4) Use fire protection equipment only for firefighting.

5) Know location of fire extinguishers and other firefighting equipment.

6) Report all fire hazards to your foreman immediately.

7) Gasoline shall not be used purposes.

8) Do not use flammable fuels for staffing or for "warm up" fires.

HOUSEKEEPING

1) Maintain good housekeeping in your area.

2) Do not leave scrap on ramps, runways, stairways or designated paths of travel.

3) Keep hoses, cables and ropes coiled, tied and in the clear.

SAFETY TRAINING

The goal of our safety-training program is to develop safe work habits and attitudes. It is critical that new workers understand work rules and procedures prior to being assigned a job. Supervisors are responsible for providing safety training to their department employees utilizing the job instruction training (PT) method described below.

HOW TO GET READY TO INSTRUCT

Have a Timetable- How much skill you expect them to have by a certain date.

Break Down the Job- List important steps pick out the key points (Safety is always a key point).

Have Everything Ready- Correct equipment, materials and supplies.

Have the Workplace Properly Arranged just as the worker will be expected to keep it.

Remember- when teaching adults, the following points are important:

1. Adults learn best in a warm, friendly atmosphere.
2. Adults don't like to waste time; and
3. Adults respond quickly to praise and attention.

JOB INSTRUCTION TRAINING (JIT) HOW TO INSTRUCT

1) Prepare- put the worker at ease. Define the job and find out what is already known about it. 2) Present- Tell, show and illustrate one IMPORTANT STEP at a time. stress each KEY POINT.

Try Out Performance:

- Have the person do the job -correct errors.
- Have the person explain each key point to you as the job is done again.
- Make sure the person understands.
- Continue until YOU know the person knows.

Follow-up:

- Put them on their own.
- Designate to whom to go for help.
- Check frequently.
- Encourage questions.
- Taper off extra coaching and close follow-up. Safety is always a key point.

NEW EMPLOYEE CHECKLIST EMPLOYEE:

DEPARTMENT:

DATE HIRED: SUPERVISOR:

Supervisor: Check off each item as you discuss it with the new employee prior to having that employee start work.

1. Provide company policy statement and safety rules.

2. Explained function of company safety committee

3. Reviewed injury reporting procedures.

4. Issued safety equipment-glasses, ear plugs, respirator, etc., and use and care. explained

5. Reviewed lockout and tag procedures.

6. Reviewed safe lifting procedures.

7. Will forklift training be required? If yes, when?

8. Reviewed housekeeping and clean-up procedures.

9. Located first aid kits and, or company hospital.

10. Reviewed hazard communication program, location of sheets and how to read MSDS.

11. Reviewed evacuation procedures and any specific duties safety date

12. Does the employee understand the above?

I acknowledge that information on the above subjects was furnished to me during my orientation.

EMPLOYEE'S SIGNATURE.

I have instructed the above-named employee in the fundamental of safety practices.

SUPERVISOR'S SIGNATURE.

Sign and return the original copy immediately to the Personnel Office following the employee's date of hire or transfer into your department. Retain a copy in the employee's department file.

INSPECTIONS

Inspection works because it is an essential part of hazard control; it is an important management tool, not a gimmick. We will view inspections as a fact-finding process, not faultfinding. We will emphasize locating potential hazards that can adversely affect safety and health.

All personnel will be responsible for continuous, ongoing inspection of the workplace.

When uncovered, potentially hazardous conditions will be corrected immediately or a report will be filed to initiate corrective action.

Periodic planned inspections will be made by members of the safety committee (or other designated individuals) utilizing the company self-inspection form. The safety committee will review the report and action will be taken to eliminate uncovered potential hazards. Assignments, target dates for completion and actual completion dates will be documented in the minutes of the safety committee. All inspection sheets will be filed and stored on site.

INSPECTION REPORT INSPECTION CONDUCTED BY:

DATE: DEPT: PLANT:

SAFETY PRACTICES

-Are Employees Wearing the Required Safety Equipment? Yes ()) Explain

-Are Employees using Adequate Foot Wear and Clothing?
Yes () No () Explain

-Are Employees Following Safety Rules and Procedures?
Yes () No () Explain

-Are Food or Drinks Present in the Work Area?
Yes () No () Explain

-Other Comments

HOUSEKEEPING (neatness/cleanliness of work area)

-Are Floors Kept Clean?
Yes () No () Explain

-Are Floors Slippery?
Yes ()) Explain

-Is Equipment & Material Neatly and Safely Kept and Stored?
Yes ()) Explain

-Are Working Tables Kept Neatly and Clean?
Yes () No () Explain

-Are Hazardous Materials Being Properly Stored and Labeled?
Yes () No () Explain

-Are There Adequate Trash Cans?
Yes () No () Explain

-Other Comments

FIRE SAFETY

-Are Fire Extinguishers Accessible, Serviced and Tagged? (Dated and Initialed Monthly) Yes () No () Explain

-Are Fire Alarms Available and in Working Order? (Have you tested smoke alarms?) Yes () No () Explain

-Are Exit Doors Accessible and Properly Marked?
Yes () No () Explain

-Are Flammable Materials Properly Stored and Labeled?
Yes or No O Explain

-Is Flammable Waste and Rubbish Being Properly Disposed?
Yes or No O Explain

-Are Overhead Fans Clean?
Yes () No () Explain

-Are Electrical Wiring, Connections, Boxes and Controls in Good Condition? (Covers, Doors, etc.) Yes or No Explain

-Are Fire Doors Free of Obstructions?
Yes () No () Explain

-Other Comments

MACHINERY & EQUIPMENT

-Are Moving Parts of Machines and Equipment Properly Guarded? (Vacuums, key machines, cords, etc.?) Yes () No () Explain

-Are Points of Operation Properly Guarded?
Yes () No () Explain

-Are Safety Controls and Devices Operating Properly? (No manufacturer's guards are to be removed/disabled?) Yes () No () Explain

-Are Cylinders Secured and Properly Stored?
Yes () No () Explain

-Are Fork Lifts in Good Working Order?
Yes () No () Explain

-Other Comments

GENERAL CONDITION

-Is There Adequate Ventilation?
Yes or No O Explain

-Is Dust Control Adequate?
Yes () No () Explain

-Are Hand Tools Properly Maintained and in Good Condition?
Yes 0 No O Explain

-Are Storage Racks in Good Condition and Earthquake Safe?
Yes, No O Explain

-Are Employees Aware of Safety Rules and Procedures?
Yes () No () Explain

-Is the Non-Smoking Policy Being Enforced?
Yes, No O Explain

-Are Bathrooms Clean and in Good Working Order?
Yes or No () Explain

-Are Required Safety Signs Properly Displayed?
Yes () No () Explain

-Is First Aid Cabinet Properly Stocked?
Yes () No () Explain

-Is Emergency Lighting Available and in good Working Order?

Yes () No () Explain_____

-Does the Supervisor Have a Working Flashlight? (Check batteries!)

Yes () No () Explain_____

-Are Aisles Properly Marked and Free of Obstructions?
Yes or No O Explain_____

-Other Comments

_____

General Comments and Recommendations

_____

_____

_____

SAFETY COMMITTEE & SAFETY MEETINGS:

Our company safety committee will be comprised of members of the various departments and management. They will meet on a quarterly basis and review the following:

1)Minutes of the previous meeting;

2) Unfinished business of the previous meeting;

3) Self-inspection reports

4)Discussion of accidents and corrective action taken;

5) Accident trends;

6)New and outstanding recommendations submitted by outside agencies (insurance carrier, fire department, Cal-OSHA, etc.); and

7)New business.

All meetings will be documented. The managers will be responsible for holding property safety meetings on a monthly basis, after the monthly self-inspection. Employee attendance and discussion topics will be documented.

SAFETY COMMITTEE MEETINGS

DATE: _____
COMMITTEE MEMBERS PRESENT:_____
_____

_____

MINUTES TAKEN BY:_____

GUESTS:
_____

1. REVIEW MINUTES OF PREVIOUS MEETING (held on _/
2. UNFINISHED BUSINESS OF THE PRIOR MEETING:

_____

_____

3. ACCIDENTS

REVIEW	CORRECTIVE ACTION
_____/	_____
_____/	_____
_____/	_____
_____/	_____
_____/	_____
_____/	_____

4. ACCIDENT TRENDS

REVIEW	CORRECTIVE ACTION
_____/	_____
_____/	_____
_____/	_____

5. SELF-INSPECTION REPORTS

REVIEW	CORRECTIVE ACTION
_____/	_____
_____/	_____
_____/	_____
_____/	_____
_____/	_____

6. RECOMMENDATIONS SUBMITTED BY OUTSIDE AGENCIES: (Insurance carrier, fire department, Cal-OSHA, act.):

_____

_____

7. NEW BUSINESS

_____

_____

ACCIDENT INVESTIGATIONS AND REPORTS

It is the policy of Direct Disposal to carry out a thorough program of accident investigation. Management personnel will be primarily responsible for making an investigation of all accidents in their areas of responsibility. Accidents involving fire, death, serious injury or extensive property damage will be investigated jointly by the General Manager, Manager, and Safety Coordinator.

The primary goal of the accident investigation program is the prevention of future similar accidents through the use of knowledge derived from the investigations. Additionally, the investigation will be used to prepare reports required by Federal and State law as well as the Workers' Compensation Insurance Carrier. These reports are critical in establishing the Company's and the Manager's liability under the law.

When an employee is injured at work, the Manager is responsible for taking emergency action to have first aid administered, obtain professional medical attention as soon as possible and protecting other employees and equipment. The Manager must then begin to investigate the circumstances of the accident, the following procedures have been found to be effective when investigating the accident:

A) GO to the scene of the accident at once.

B) TALK with the injured person, if possible. Talk to witnesses. Stress getting the facts and not placing blame or responsibility. Ask open-ended questions.

C) LISTEN for clues in the conversations around you. Unsolicited comments often have merit.

D) ENCOURAGE people to give their ideas for preventing a similar accident.

E) STUDY possible causes of unsafe conditions and unsafe practices. F) CONFER with interested persons about possible solutions.

G) WRITE your accident report giving a complete, accurate account of the accident.

H) FOLLOW UP to make sure conditions are corrected. If they cannot be corrected immediately, report this to your supervisor.

I) PUBLICIZE corrective action taken so that all may benefit from the experience; and

In order for the Supervisor's Report to be effective, it should contain, as a minimum, a detailed answer to the following questions:

A) What Was the Employee Doing? Explain in detail the activity of the employee at the time of the accident.

B) What Happened? Indicate in detail what took place. Describe the accident, the type of injury, the part or parts of the body affected and whether the employee was wearing appropriate safety equipment.

C) What Caused the Accident? Explain in detail the condition, act, malfunction, etc., that caused the accident. Remember that it is possible to have more than one reason or cause for an accident.

D) What Can Be Done to Prevent a Similar Accident? -Indicate corrective action to prevent recurrence.

The Supervisor's Report, along with the Employee Report, must be submitted to the Personnel Office not later than 24 hours after the accident. Each supervisor must maintain an adequate supply of the Supervisors Report and the Employee's Report forms that may be obtained from the Personnel Office.

Signature_____

Date_____

EST. AGE	Married? Yes No	Occupation	Employment Date	Date of Injury/Time AM PM

Exact Location

Describe injury or damage

Was injured or driver acting in regular line of duty? Yes No

Name of Witness

UNSAFE ACT (what happened)

Operating without authority; failure to secure or warn
Operating or working at unsafe speed
Making safety devices inoperative
Using unsafe equip. hands instead of equip, or equip. unsafely
Failure to use safe attire or personal protective equipment
Improper: turn lane usage backing interval interval signal _judgment Other:

Unsafe loading, placing, mixing, combining, etc.
Taking unsafe position or posture
Working on moving or dangerous equipment
Lack of job training or instruction
Lack of job training or instruction

UNSAFE CONDITIONS

___ Improper guarding (unguarded, inadequately guarded, guard removal, etc.)
___ Defective substances or equipment (broken, poor design, slippery, etc.)
___ arrangement (unsafely piled material, poor layout, poor lighting)
___
___ Housekeeping. (No aisle markings, etc.)
Improper dress or apparel (goggles, gloves, shoes, masks, sleeves, etc.)
Defective: brakes motor steering tires wheels or rims Other:

_Improper illumination (none, glaring light, etc.)
Improper ventilation (poor, dusty, gassy, high Hazardous humidity, etc.)
Poor road or visibility condition

STEPS TAKEN TO PREVENT A RECURRENCE:

Instructed employee
Warned employee
Other action

Supplied safeguard
Supplied personal equipment

Eliminated condition
Repaired condition
Guarded machine

Other action

Reported condition to:

_____ _____

SUPERVISOR'S SIGNATURE DATE

Supervisor's Accident

Plant or Job	Name of injured or driver

FIRE EXTINGUISHERS

Fire extinguishers can be an effective method of fighting small fires that may occur.

The type of extinguisher used will depend on the type of fire being fought. The following are the different types of extinguishers available and their uses:

TYPE A	paper products only
TYPE B	flammable liquids
TYPE C	electrical fire
TYPE D	all purpose

Most extinguishers are designed to extinguish only small fires. Large fires should be abandoned and left to the expertise of professional firefighters.

All employees shall be instructed on the proper use of fire extinguishers. In addition to this, the instructions for use are clearly posted on each extinguisher.

FIRE ALARMS

Fire alarms are utilized by employees to warn individuals of the existence of a fire. Fire extinguisher locations can be found in Page of this document. Fire department personnel turn off the fire alarms only.

FIRE DRILLS

The Safety Coordinator shall conduct regular fire drills. These drills are designed to test the fire alarm equipment and inspect the procedures used by the employees in reacting to the fire alarms. All employees must take all fire drills seriously. When a fire drill is conducted, all procedures for an actual fire emergency shall be followed with the exception of the notification of actual emergency personnel from responding agencies. No fire alarms should be utilized during drills that automatically notifies local emergency services agencies of a potential fire,

FIRE EMERGENCY PROCEDURES

Fires can start from a variety of sources and can spread rapidly. Quick and effective action is necessary to prevent the loss of life and reduce the amount of property damage.

Sound the alarm. Special care must be taken during the activating of alarms to anticipate potential panic by our employees and guest.

Once an alarm goes off and there is no verification of fire, two members of the fire team should go to the effected zone to verify the fire.

The General Manager should be contacted after the Fire Department has been called. The General Manager or their designee will decide who should be notified,

The department managers should report IMMEDIATELY to the General Manager for instruction.

Once the fire Department arrives, the captain should be told where the emergency box is located.

The General Manager or their designee will assign certain employees to assist with the evacuation of handicapped employees where necessary.

Interior lights will be left on unless otherwise directed by fire personnel.

Attempts to extinguish fires shall be done exercising good judgment.

Do not attempt to extinguish the fire when:

1) It is obviously beyond the capability of the available equipment.
2) The fire could block your exit from the building.
3) You are unfamiliar with the operation of the fire extinguisher.

Do attempt to extinguish a fire when:

1) The fire department has been called.
2) The fire is small and contained as in a wastebasket, cushion, or mattress.
3) You can fight the fire with your back to a clear exit.
4) You are familiar with how to operate the fire extinguisher.

As soon as possible, employees shall take a "roll call" of those persons assembled at the "regrouping" area to determine if any persons are missing. This information shall be given to the Fire Department or Police Department upon arrival.

In the event the fire involves chemicals, this information shall be stressed to the Fire Department upon initial contact.

If the "regrouping" area is downwind of the chemical fire, an alternate location shall be used which places the evacuees upwind from the fire.

If the fire is threatening the administrative office, the following items should be removed if can be done safely:

Personnel-Put active personnel files and INS 1-9 files in fireproof safe,

Once the fire has been controlled and operations have returned to normal, the General Manager is responsible to ensure an incident form is completed and a copy is sent to the insurance company and the corporate office.

EVACUATIONS

CAUSES OF EVACUATION

A variety of disaster or emergency agents can cause the necessity of evacuation from the premise. Such events include fire, chemical accidents, structural damage, bomb threats, or similar suspicious objects, gas leaks, and flooding.

AUTHORITY TO EVACUATE

The authority to evacuate the facility is vested in the General Manager or their designee.

EVACUATION LOCATIONS

In the event of a fire or other emergency which requires only a temporary evacuation customers and employees will be directed to the regrouping area at 3719 Noakes Street. Customers and employees not involved in the evacuation process will be assembled at this location and accounted for by the supervisor on duty.

EVACUATION EMERGENCY PROCEDURE

In the event that the General Manager, their designee, or fire/police officials decide to conduct an evacuation, the following procedures will be followed:

NOTIFICATION

Notification of evacuating our premises would be accomplished through the use of fire alarms, or verbally. The General Manager and/or their designee will assign certain employee to the task.

The General Manager and/or their designee will immediately notify the fire department that the evacuation is being conducted, Provide the fire department with as much detail as possible,

STAFF PROCEDURES

Perform the same procedures as those listed under "Fire Emergencies".

REGROUPING

All people will leave the building and regroup at a specific designated area across the street at the entrance to 3719 Noakes Street.

ACCOUNTABILITY

The employee(s) designated by the General Manager or their designee will, as soon as possible, conduct a roll call to ensure that all are accounted for. This information will be transmitted to the fire or police department upon arrival.

An incident report must be completed and presented to the General Manager.

DISCIPLINARY PROCEDURES

Employees who fail to comply with safety rules will be subject to disciplinary action up to and including termination. Supervisors will follow the normal disciplinary procedures as follows:

1) Verbal counseling is -the first step that must be documented in the employees personnel file.

2) Written warning -outlining nature of offense and necessary corrective action;

3) Suspension without pay -the third step or separate disciplinary action resulting from a serious violation; and

4) Termination -if an employee is to be terminated, specific and documented communication between the supervisor and the employee, as outlined, must have occurred.

Supervisors will be subject to disciplinary action for the following reasons:

l) Repeated safety rule violation by their department employees;

2) Failure to provide adequate training prior to job assignment;

3) Failure to report accidents and provide medical attention to employees injured at work.

4) Failure to control unsafe conditions or work practices; and

5) Failure to maintain good housekeeping standards and cleanliness in their departments;

Supervisors who fail to maintain high standards of safety within their departments will be demoted or terminated after three documented warnings have been levied during any calendar year.

Signature _____ Date

HAZARD COMMUNICATION

HAZARD EVALUATION

Chemical manufacturers and importers are required to review the available scientific evidence concerning the hazards of the chemicals they produce and to then report that information to employers who purchase their product. In most cases, Direct Disposal will choose to rely on the evaluations performed by our suppliers. If, for some reason, we do not trust the evaluation of the manufacturer, we will arrange for additional testing.

We will consider any chemicals listed in one of the following sources to be hazardous:

- 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration (OSHA);
- Threshold Limit Values for Chemical
- Substances and Physical Agents in the Work
- Environment, American Conference of
- Governmental Industrial Hygienists; or
- Those hazardous substances prepared pursuant to Labor Code Section 6382.

LABELS AND OTHER FORMS QE WARNING

We will make certain that containers are adequately labeled to identify the hazardous chemicals contained therein, and will show hazard warnings appropriate for employee protection. The warnings will utilize a combination of words, pictures and symbols that will convey the hazards of the chemical(s) in the container. The labels will be legible and prominently displayed.

Exceptions to this rule are as follows:

- We are permitted to post signs which convey the hazard information if there are a number of stationary containers in a given area which have similar contents and hazards;
- Operating procedures, process sheets, batch tickets, blend tickets and similar written materials can be substituted for container labels on stationary process equipment if they contain the same information and are readily available to employees.
- We are not required to label portable containers, as long as the transferred, chemical is for immediate use by the employee who made the transfer.
- We are not required to label pipes or piping systems; and
- Our employee-training program will include instruction on how to read and interpret label information.

MATERIAL SAFETY DATA SHEETS (MSDS)

The management of Direct Disposal is responsible for obtaining or developing a MSDS for each chemical used in the workplace. Each MSDS will include the specific chemical identity of the chemical involved and the common names.

Each data sheet will provide: information on the physical and chemical characteristics of the chemical; known acute and chronic health effects and related health information; exposure limits; whether the chemical is considered to be a carcinogen; precautionary measures; emergency and first aid procedures; and the identification of the organization responsible for preparing the sheet.

Each department supervisor will be responsible for maintaining the MSDS's describing chemicals used in the supervisor's department and for keeping them readily available to employees. The program coordinator will maintain a master file for all departments.

Our employee-training program will include how to read and interpret information on a MSDS, and how employees can obtain and use the available hazard information.

EMPLOYEE TRAINING

It is the goal of Direct Disposal to provide hazard communication training during the first 30 days of employment and whenever a new chemical is introduced to a given work area. Training will be done in a classroom setting and will be conducted by the program Coordinator other properly trained personnel. The training program will consist of:

- How the hazard communication program is implemented, how to read and interpret information on labels and MSDS and how employees can obtain and use the available hazard information.
- The hazards of the chemicals in the work area;
- Measures employees can take to protect themselves from the hazards.
- Specific procedures put into effect by the company to provide protection, such as personal protective equipment; and
- Methods and observations, such as visual appearance or smell, workers can use to detect presence of a hazardous chemical.

A right to know center is located in the main office and in the hallway in the east entrance of the building posted on the wall.

RIGHT-TO-KNOW TRAINING PROGRAM

PERFORM THESE STEPS

1) Introduce the Right-to-Know coordinator and explain the coordinator's role.
2) Review the company's written hazardous communication program and explain how to obtain and use the document.

3) Explain applicable safety and health requirements mandated by OSHA and state standards.

4) Identify locations where hazardous chemicals are stored, handled, dispensed or transported, and the location of each process and operation that uses them.

5) Explain how to recognize potential health hazards and review monitoring used to detect potential health hazards.

6) Explain how to read. MSDS's and related information and/or labels. 7) Explain safety precautions to be taken by the individual worker.

8) Explain in detail the labeling system used by the company.

9) Use audiovisuals to teach basic hazardous communication information to the general plan population.

10) Warn about specific work activities that increase the likelihood of a loss.

Signature_____

Date_____

EMERGENCY ACTION PLAN

Major disasters must be anticipated and procedures must be developed and mastered if the wellbeing of our personnel is to be protected and if we are ready to serve our community.

The following pages detail the organizational structure of our plan and outlines emergency measures to be taken in the event of fire or another emergency.

Remember, your conduct and actions during the first few minutes of any emergency may not only save your life but the lives of your fellow workers and other members of the community as well.

GENERAL INFORMATION

Two important telephone calls need to be made if the facility is to be evacuated for any of the following reasons:

1) A fire or disaster within the facility; or

2) An external hazardous condition threatening the facility.

If either of these two situations occurs, call 911 and / or notify these agencies:

1) Fire department.

2) Civil Defense.
3) Gas Company.
4) Electric Company.

The telephone numbers will be posted for these agencies.

Upon order of management or other person(s) in charge to totally evacuate the facility, the following action will be taken:

1) Initiate evacuation center receiving plan. It may be necessary to transport company personnel to a local evacuation center.

2) Handicapped employees must be shown utmost responsibility towards getting them to safety. 3) Materials and supplies to be evacuated including first-aid kits and personnel roster.

SAFETY COMMITTEE RESPONSIBILITIES

The Safety Committee will:

1) Coordinate the emergency Evacuation Plan throughout the facility.

2) Make certain the Program is familiar to all personnel and that all new employees are promptly oriented.

3) Schedule fire classes as necessary.

4) Arrange and execute fire drills within the facility.

5) Maintain a log of fire drills conducted. The log shall include the date and time of each drill, the time required to evacuate the building and the initials of the person making the recording.

6) Report any deficiencies noted during the fire drill.
7) Correct any deficiencies noted during the fire drill.

8) Maintain a file of committee meetings and activities, including committee minutes.

The Safety Committee will be aided by Supervisors who will:

1) Facilitate the Emergency Evacuation Plan.

2) Keep a constant check on all personnel to be sure that they are completely familiar with all phases of the Plan that they are required to know.

3) See that all personnel participate in ALL fire drills, fire classes, and other practice sessions.

4) Be certain that all personnel are familiar with, and make thorough fire prevention inspections when they are assigned to do so.

5) Take the necessary steps required to correct any fire hazards discovered.

It is the duty of every employee to:

1) Be completely familiar with the Emergency Evacuation Plan and the employee's duties and responsibilities in the program.

2) Participate in all fire drills and practice sessions.

3) Attend all fire training classes when assigned.

4) Learn the location of and how to operate all fire alarm systems and all fire extinguishing equipment.

5) Report any fire and/or safety hazard located any place on Company property.

FIRE PROCEDURE

"Keep Calm...Report all fires and smoke."

Personnel have been assigned to:

1) internal fire alarm.

2) Notify office staff.

3) Remove personnel from the building.

4) Close all doors and windows in the fire area, but ONLY if this can be done safely

5) Notify the fire department.

The person reporting the fire to the fire department will provide them with the following information:

1) Company name.
2) Address.
3) What is burning (machines, paper, etc.)?
4) Location of fire (roof, plant office, etc.)
5) Type of fire (electrical, liquid, etc.)

Additional assignments have been made to:

1) Attempt to extinguish the fire with the use of on-premises equipment (extinguishers, hoses, etc.). A minimum of two persons is required to fight a fire. To insure employee safety, this is to be done only during the early stages of a fire.

    Working away from the involved area, personnel will be assigned to:

    1) Clear the aisles, hallways and other areas of personnel and visitors.
    2) Close all doors and windows.
    3) Check driveways to see that they are clear for entry of firefighting equipment. See that gates are unlocked and open;
    4) Wait at the front entrance for arrival of firefighting equipment. Direct the fireman to the fire, if necessary; and
    5) Re-entry onto the property will not be permitted until it is declared safe to do so by someone with executive authority or by the local fire or law enforcement officials.

<u>EARTHQUAKE</u>

In the event of an earthquake the following procedures shall be followed:

1) Assess damage and injuries;

2) Give first aid as needed. Remember, after an earthquake, utilities police and fire agencies may not be readily available. DO NOT ATTEMPT TO TELEPHONE UNLESS ESSENTIAL;

3) Notify executive management if any are away from the premises;

4) Call the Fire Department only in the case of fire;

5) The nearest hospital for treatment is:

    White Memorial Hospital

    1720 East Cesar Chavez Blvd.
    Los Angeles Ca 90033

6) Have damaged or potentially damaged utilities shut off at the main controls;

7) Personnel are to be instructed during orientation that they are to take shelter under a sturdy table or equipment during an earthquake and remain there until all shaking has ceased;

8) Evacuate as necessary. Supervisors shall be responsible for seeing that employees are evacuated to a safe area outside the building and clear of overhead electrical lines, utility posts, block walls, etc., which might fall during aftershocks. Supervisors are cautioned to be alert for fallen high-tension lines that may be touching metal objects on the ground;

9) Have all areas of the building inspected for damage before allowing personnel to return to the building(s);

10) Have gas, electrical, water and fuel systems checked for damage before allowing personnel to return to the building(s); and

11) Drinking water should be checked to determine that it is not contaminated. Water contained in toilet tanks can be boiled and used if absolutely necessary for drinking or for treating injuries.

How to Establish an Adequate Safety Program

The variety of State and Federal Legislation now in effect imposes strict responsibility on employers for establishing a safe work environment for their employees. Besides these legal responsibilities, it is well established that a reduction in employee accidents can increase the efficiency and profitability of any business. These facts point up the importance of establishing an adequate safety program backed by, and involving, top management.
Since each company has its own particular problems and procedures, there can be no universal safety program. The following outline, however, lists the fundamentals of an adequate employee program and suggests steps that can be taken to adapt them to a company's individual methods of operation.
In addition, your carrier's Workers' Compensation Loss Control Department is available for help in setting up safety programs, providing information on recent legislation, or offering advice on safety matters for employees.

Outline of a basic safety program:

Step 1.	Management involvement.
Step 2.	Supervision and responsibility for the program.
step 3.	Employee selection and training.
Step 4.	Safety maintenance and premises protection.
Step 5.	General safety standards.
Step 6.	Accident reports and records.
Step 7.	Educational materials and incentives.

1) Management involvement

Management must assume the leadership for a complete safety program, which covers OSHA requirements for employees, as well as premises. Every company should develop a written policy statement outlining policies and safety goals for its employees. This should be sent the scope of, and program. to all employees detailing responsibilities for, the

2) Supervision and responsibility for the safety program

It is important for the efficient operation of the program that one individual be delegated the complete authority to properly administer, regulate, and coordinate the safety program. While this person may be a safety director or department head, it is well to remember that the ultimate responsibility for success or failure rests with top management.
Care should be taken to see that every individual who supervises employees is informed and instructed in duties and responsibilities and held accountable for the enforcement of the program in their area.

3) Employee selection and training

Competent and cooperative employees are, of course, vital-not only to an effective safety program, but to the overall profitability of the business.
Proper training and job orientation are essential in developing qualified personnel. Ideally, this includes:

A) Written company policies, general rules and regulations;

B) Written training manuals with steps required to perform the job properly, the reasons behind the steps, up-to- date technical aspects of the job, and any safety considerations. Manuals of this type establish management's interest and intent to provide proper training;

C) Details of the company's safety program; and
D) Specific procedures to accident or injury.

It must be recognized that training in safety is a continuous process that requires supervision. 4) Safety maintenance and premises protection

A regular periodic inspection of all premises and operations is necessary for continued safe operations and the safety of employees. These inspections should be at least monthly although a more frequent inspection schedule is preferable when there is a high degree of exposure.

One of the surest ways to get employee involvement and cooperation in a safety program is to establish a safety committee that can monitor employee (OSHA) safe working conditions. This procedure is recommended even for manufacturing operations with as few as 15 employees. While such a committee can be limited to supervisors, foremen and department heads, it is preferable to include general employees as well.

The committee should have the authority to review the company's safety policy, training methods and safety equipment, review and investigate accidents, make recommendations for the alleviation of unsafe conditions, premises, practices or equipment. Inspection duties might be assigned to a member(s) of the committee with findings to be reported to the full group.

5) General safety standards

Checklists to assist inspections for various industries are available from your carrier's Workers' Compensation Loss Control Department. The following list of suggestions, based on OSHA, is intended only as a general indication of items covered in a complete safety program.

A) Provide adequate protection and guarding of all machinery and equipment used either by employees or the public including:

l) Point of operation; 2) All moving parts;
3) All driving mechanisms;
4) Proper grounding of all electrical equipment;
5) Proper grounding of all areas subject to static electricity exposures.

B) Provide adequate premises protection including:

1) Installation of proper guard rails, handrails or other protection for hazardous areas where required
2) Institution of proper housekeeping procedures by having regular and frequent cleanup schedules of all areas, including kitchen and food preparation and the maintaining of cleaning and sanitation schedules and records;
3) Maintaining a regular inspection procedure for all fixtures and equipment of either a manual or a power type used by employees or by the general public; and
4) Institution of a regular maintenance program for all floors, walks, stair surfaces and so forth, including parking lots, to eliminate slip and fall hazards.

C) Provide adequate personal protective equipment necessary to the job.

D) Provide safe methods, procedures and equipment for handling of material including:

1) Adequate lifting devices and procedures;
2) Safely arranged warehousing, storage and distributing areas, laundry rooms, etc.; and
3) Safely maintained and regularly inspected hoists, elevators, escalators, conveyors, etc.;

E) Provide adequate fire prevention policies and facilities including:

1) Adequate and well-maintained fire extinguishing equipment;
2) Training personnel in the proper use of the equipment;
3) Providing emergency evacuation procedures and drills;

4) Maintaining adequate and well- marked exits from all areas.

F) Provide an adequate first aid program including:
1) Providing and maintaining adequate first aid equipment;
2) Training of certain key employees in basic first aid requirements;

G) A number of standards require periodic medical examinations of employees. These examinations are to be made at the employer's expense. The Secretary of Health Education and Welfare (HEW) is also authorized to set up medical examination programs necessary to determine the incidence of occupational disease. HEW would pay for such programs, being research-oriented and mandatory. Medical surveillance required by Standards on asbestos, vinyl chloride, carcinogens, and coke oven emissions.

Hazards requiring special medical examinations include, but are not limited to:

Chromic acid
Asbestos
4-Nitrobiphenyl
Alpha-Naphthylamine
Methyl Chloromethyl ether
3,3-Dichlorobenzidine (and its salts)
Bis-chloromethyl ether
Beta-Naphthylamine Benzidine
4-Aminodiphenyl
Ethyleneimine
Beta-Propiolactone
2-Acetylaminofluorene
4-Dimethylaminoazobenzene
N-Nitroso dimethylamine
Vinyl chloride
Coke oven emissions

6) Accident reports, records

Accurate reporting of all accidents must be made in accordance with OSHA, or insurance company regulations. In addition, adequate investigations and records should be maintained of all incidents or unusual occurrences, whether resulting in injury or not because of the potential for future injuries or risks to employees. Such records should include the date, time and location of the occurrence, the personnel involved, the extent of the hazard or injury to the employee, the cause of the incident, and the corrective measures taken or proposed.

These records assist in determining principal accident or hazard sources, provide information on unsafe conditions and practices and can be used to improve conditions or set higher standards of performance.

Publishing a periodic accident summary showing comparisons of performance between different company locations or departments can provide an effective stimulus for accident prevention.

7) Educational materials and incentives

A variety of materials are available for use in your safety program. Your carrier's Workers' Compensation Loss Control representatives will also be available on an occasional basis to attend safety meetings within an organization. Periodic safety meetings involving all personnel or individual meetings within a department are an excellent method of encouraging cooperation in the safety program and of disseminating safety materials and ideas.

A) Among the materials available through your carriers Workers Compensation are the following:

l) Safety poster service;
2) Safety publications for both supervisors and other personnel designed for specific types of business and operations;
3) Safety incentive program suggestions; and
4) Special audio-visual materials to support training.

B) Safety Bulletin Board

A safety bulletin board should be located so that all personnel and the general public frequently see it. It should be reserved specifically for safety material as a vital asset to the function of a. safety program.

C) More safety and health hints cover safety and health in your publications and at your monthly and annual meetings.

Check first aid and hospital facilities. Are they adequate? Develop a "Job Safety Analysis" for all operations where the potential for injury or occupational illness may be significant. Review all plans for remodeling or layouts of new facilities for possible Cal/OSHA violations. Your purchase orders for new machinery should stipulate that the supplier must design and equip machinery to comply with OSHA standards. Let your employees and stockholders know that safety and health are as important to your company as is the productivity of your organization.

Loss Control Representatives will advise regarding the possible use of these materials.

Excellent safety materials are also available from other sources such as the National Fire Protection Association and, the National Safety Council.

.Hints for Setting Up an Effective Safety Committee

Class I (15 to 75 employees in one location)

A General Committee of not less than four (4) persons shall be selected of which at least one (l) member shall be in a position of authority, which shall act as the chairperson. Employees selected shall be from various working levels and should are familiar with their jobs and general operations. The committee shall:

1) Meet monthly for minimum of thirty minutes.

2) Review and approve the safety inspection work and reports;

3) Review and discuss all pertinent safety recommendations to determine their practicability.

4) Written records of such discussion and approved recommendations shall be kept in the form of minutes;

5) Study the causes of accidents occurring since the last meeting for the purpose of devising methods to prevent recurrence; and

6) Set up systems to educate employees in the hazards of their work, and in safety practices, through the use of bulletins, safety publications, printed rules, and other safety training aids, and oral instructions.

Class 2 (76 to 500 employees in one location)

A General Safety Committee of not less than three (3) persons, nor less than (I) per one hundred (100) employees, shall be selected from the upper echelon of supervisory personnel with a member of top management acting as chairperson. This committee shall:

A) Meet monthly for a minimum of thirty minutes.
B) Review and act on the safety inspector's reports and the Workers' Committee reports;
C) Review and discuss all pertinent safety recommendations to determine their practicability. Written records of such discussion and approved, recommendations shall be kept in the form of minutes;
D) Study the causes of accidents occurring since the last meeting for the purpose of devising methods to prevent recurrence;
E) Set up systems to educate employees in the hazards of their work and in safety practices through the use of bulletins, safety publications, printed rules, and other safety training aids, and oral instructions.

A Workers' Safety committee shall consist of not less than three (3) workers, or less than one (l) per one hundred (100) employees, whichever is greater.

This committee shall:

A) Meet monthly;

B) Make not less than one (1.) inspection each month;

C) Submit written reports and recommendations for safeguarding or improving safety conditions. Such reports shall be signed by the chairperson of the committee and forwarded to the General Safety Committee; and

Supervisory employees may serve on the Workers' Safety committee where there are only casual or seasonal employees.

Class 3 (over 500 employees in one location)

A General Safety committee of not less than five (5) persons shall be selected from the upper echelon of supervisory personnel with a member of top management acting as chairperson. This committee shall:

A) Meet monthly for a minimum of thirty (30) minutes.

B) Review and approve the Safety Inspectors, Foremen's and Workers' Safety Committee safety reports;

C) Review and discuss all pertinent safety recommendations to determine their practicability. Written records of such discussion and approved recommendations shall be kept in the form of minutes; and

D) Study the causes of accidents for the purpose of devising methods to prevent recurrence,

E) Set up systems to educate employees in the hazards of their work and in safety practices through the use of bulletins, safety publications, printed rules and other safety training aids, and oral instructions.

A Foremen's Committee shall consist of not less than five (5) foremen from different departments. The committee shall:

A) Meet monthly for a minimum of thirty (30) minutes;

B) Review and approve the Safety Inspector's and Workers' Safety committee reports;

C) Review and discuss all pertinent safety recommendations to determine their practicability. Written records of such discussion and approved recommendations shall be kept in the form of minutes;

D) Study the causes of accidents for the purpose of devising methods to prevent recurrence; and

F) Set up systems to educate employees in the hazards of their work and in safety practices through the use of bulletins, safety publications, printed rules and other safety training aids, and oral instructions.

A Workers' Safety Committee shall consist of not less than (5) workers, or a minimum of (1) committee person for each two hundred and fifty (250) employees, and the Bureau shall not require more than a maximum often (20).

This committee shall:

A) Meet monthly;
B) Make not less than one (1) inspection each month; and
C) Submit written reports and recommendations for safeguarding and improving safety conditions. Such reports shall be signed by the chairperson of the committee and forwarded to the Foremen's committee.

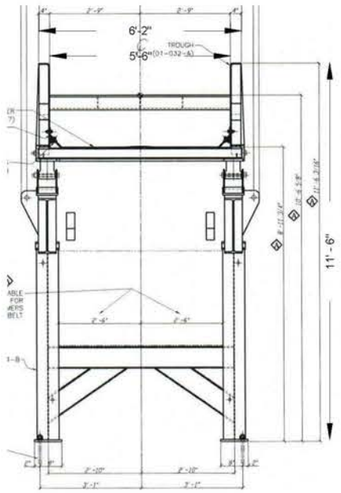
4) Supervisory employees may serve on the Workers' committee where there are only casual or seasonal employees.

Inspection service (all classes):

The Safety Inspector shall be in charge of inspection service and shall make regular monthly inspections of the location. He shall fill out and sign acceptable report forms.

APPENDIX H

PROCESSING EQUIPMENT DIAGRAMS



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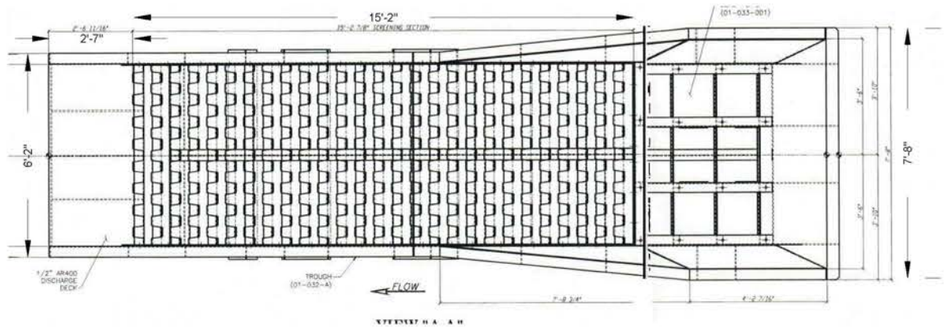

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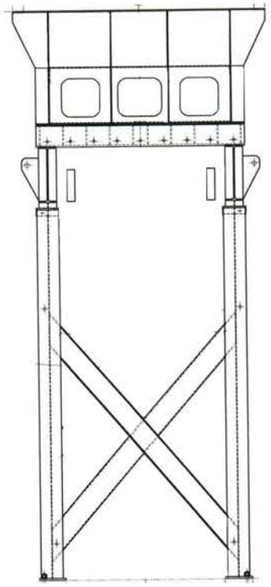
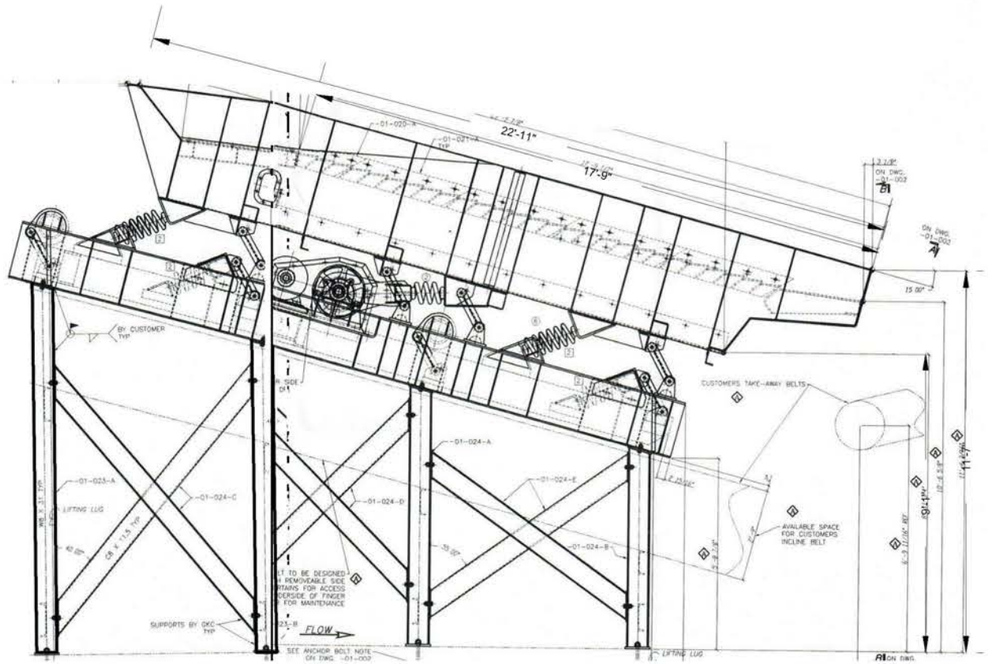


END VIEW

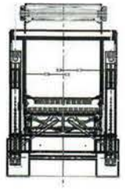


SIDE VIEW

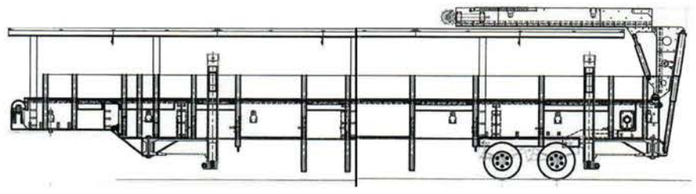
GENERAL KINEMATICS FINGER SCREEN

GRAPHIC SCALE

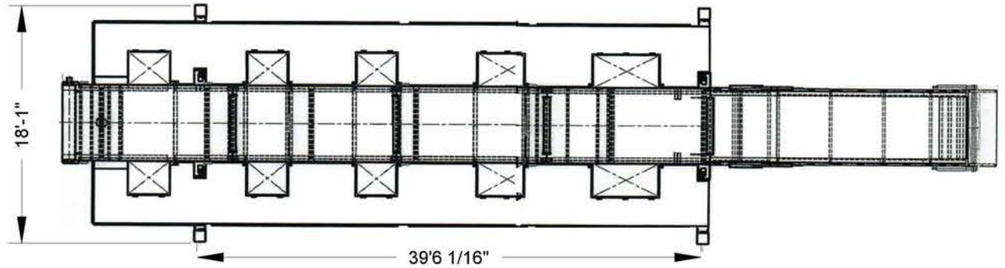
0' 25'

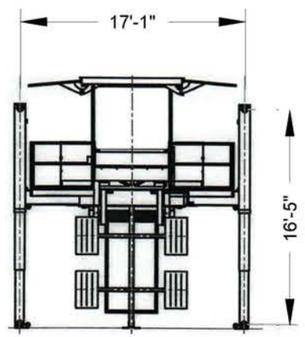


END VIEW - TRANSPORT

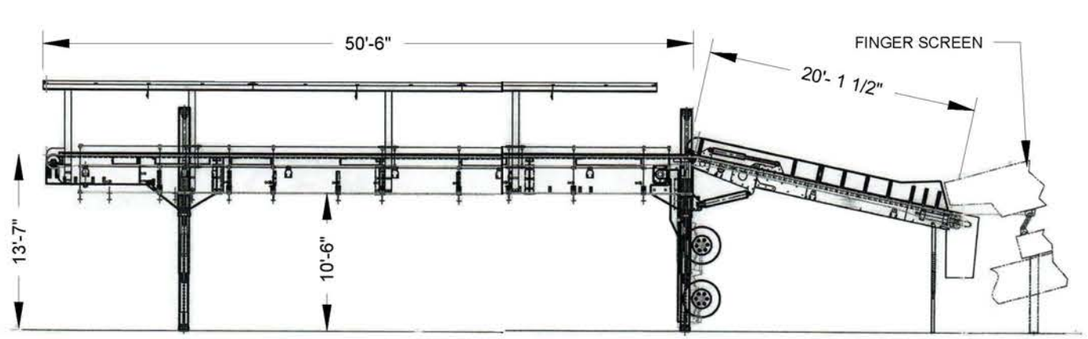


SIDE VIEW - TRANSPORT





END VIEW - PARKED



SIDE VIEW - PARKED

GRAPHIC SCALE

0' 25'

SHERBROOKE O.E.M. MOBILE SORT LINE

APPENDIX I

NON-DISPOSAL FACILITY ELEMENT

June 2018 Update to the City of Los Angeles Non-Disposal Facilities Element
Direct Disposal Inc. Transfer Station and Material Recovery Facility

Direct Disposal Inc. is a Transfer Station and Material Recovery Facility located on a 1.1-acre site at 3720 Noakes Street and a .77-acre site located at 3719 Noakes Street. The facility is currently permitted as a medium volume construction, demolition and inert material processing facility and is applying for a new solid waste permit to operate as a large volume solid waste transfer/processing facility. The facility will receive handle, separate, process, store and transfer up to 1,000 tons per day (TPD) of municipal solid waste (MSW), mixed waste, green waste, organics and construction, and demolition/inert (CDI) material.

NDFE Facility #85: June 2018 Update

LOCATED WITHIN THE CITY OF LOS ANGELES WITH 85% ANTICIPATED DIVERSION RATE	
TYPE OF FACILITY	Transfer Station and Material Recovery Facility
FACILITY CAPACITY	Capacity of Site: 40,000 Cu Yards/Year Capacity of Facility: 1,000 TPD
ESTIMATED AMOUNT OF WASTE SENT TO FACILITY	500 TPD
DIVERSION RATE	The facility diversion rate of 85% is the operational goal for CDI material received.
PARTICIPATING JURISDICTIONS	Areas within the City of Los Angeles, Pasadena, Glendale, Burbank, Los Angeles County and other local jurisdictions and private companies.
LOCATION	3720 and 3719 Noakes Street, Los Angeles, CA 91352
ZONING	M-3 Heavy Industrial
PERMIT NUMBER AND DATE	16013-20000-24736, 16020-20001-03077 and 16020-20001-03078 19-AR-1228 issued on 8/24/2004
FORMER NDFE #	N/A

APPENDIX J

SOLID WASTE FACILITY PERMIT APPLICATION

APPENDIX I

SITE PHOTO,
CITY OF LOS ANGELES ISSUED
CERTIFICATES OF OCCUPANCIES AND
PERMIT AND INSPECTION REPORTS

EXISTING SOLID WALL AND LANDSCAPING

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

CERTIFICATE OF OCCUPANCY

OWNER AGAJANIAN, DANIEL A CO TR
AGAJANIAN FAMILY TRUST

6572 HORSESHOE LN
HUNTINGTON BEACH CA 92648

No building or structure or portion thereof and no trailer park or portion thereof shall be used or occupied until a Certificate of Occupancy has been issued thereof. Section

CERTIFICATE:	Issued-Valid	DATE:
BY:	HENRY L BAGHDASSARIAN	03/09/2018

SITE IDENTIFICATION

ADDRESS: **3720 E NOAKES ST 90023**

LEGAL DESCRIPTION

TRACT	BLOCK	LOT(s)	ARB	CO. MAP REF #	PARCEL PIN	APN
P M 2445		B		BK 41-78	117A227 92	5192-017-008

This certifies that, so far as ascertained or made known to the undersigned, the vacant land, building or portion of building described below and located at the above address(es) complies with the applicable construction requirements (Chapter 9) and/or the applicable zoning requirements (Chapter 1) of the Los Angeles Municipal Code for the use and occupancy group in which it is classified and is subject to any affidavits or building and zoning code modifications whether listed or not.

COMMENT CHANGE OF USE FROM WAREHOUSE TO RECYCLING MATERIALS SORTING FACILITY AND RE-STRIPE PARKING.

USE	PRIMARY	OTHER
	Recycling Center or Site	(-) None

PERMITS

16016-20000-24736

STRUCTURAL INVENTORY

ITEM DESCRIPTION	CHANGED	TOTAL
Floor Area (ZC)	0 Sqft	12112 Sqft
Height (ZC)	0 Feet	
Length	150 Feet	150 Feet
Stories	1 Stories	1 Stories
Type II-B Construction		
Width	80.75 Feet	80.75 Feet
F1 Occ. Group	0 Sqft	12112 Sqft
Parking Req'd for Bldg (Auto+Bicycle)	0 Stalls	21 Stalls
Parking Req'd for Site (Auto+Bicycle)	6 Stalls	36 Stalls
Provided Compact for Site	0 Stalls	7 Stalls
Provided Disabled for Site	2 Stalls	2 Stalls
Provided Offsite for Site	12 Stalls	12 Stalls
Provided Standard for Site	-6 Stalls	15 Stalls
Total Provided Parking for Site	-6 Stalls	24 Stalls

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

APPROVAL

CERTIFICATE NUMBER	162254
BRANCH OFFICE:	LA
COUNCIL DISTRICT:	14
BUREAU:	INSPECTN
DIVISION:	BLDGINSP
STATUS:	CofO Issued
STATUS BY:	HENRY L BAGHDASSARIAN
STATUS DATE:	03/09/2018
APPROVED BY:	HENRY L BAGHDASSARIAN
EXPIRATION DATE:	

Certificate No: *162254

PERMIT DETAIL

PERMIT NUMBER	PERMIT ADDRESS	PERMIT DESCRIPTION	STATUS - DATE - BY
16016-20000-24736	3720 E Noakes St	CHANGE OF USE FROM WAREHOUSE TO RECYCLING MATERIALS SORTING FACILITY AND RE-STRIPE PARKING - SEE COMMENTS	CofO Issued - 03/09/2018 HENRY L BAGHDASSARIAN

PARCEL INFORMATION

Area Planning Commission: East Los Angeles
Community Plan Area: Boyle Heights
Energy Zone: 8
Lot Cut Date: PRIOR-07/29/1962
Zone: M3-1-CUGU
Census Tract: 2049.20
Council District: 14
Fire District: 2
Near Source Zone Distance: 1.6
Certified Neighborhood Council: Boyle Heights
District Map: 117A227
LADBS Branch Office: LA
Thomas Brothers Map Grid: 675-C2

PARCEL DOCUMENT

Affidavit (AFF) 20170448862 (LOT TIE)
City Planning Cases (CPC) CPC-2005-177-CU
City Planning Cases (CPC) CPC-2016-2905-CPU
Community Redevelopment Area (CRA) ZI 2270 ADELANTE EAST
Parking Layout (PKLY) PKG-4421
Zoning Information File (ZI) ZI-2458 Clean Up Green Up Supplemental Use Distric
City Planning Cases (CPC) CPC-1986-445-GPC
City Planning Cases (CPC) CPC-2007-5599-CPU
Community Development Block Grant (CDBG) LARZ-Central City
Ordinance (ORD) ORD-166585-SA4170II
Zoning Information File (ZI) ZI-2129 EAST LOS ANGELES STATE ENTERPRISE ZONE
City Planning Cases (CPC) CPC-1995-336-CRA
City Planning Cases (CPC) CPC-2015-1462-CA
Community Development Block Grant (CDBG) SEZ-EAST LOS ANGELES STATE ENTERPRISE ZONE
Ordinance (ORD) ORD-184246
Zoning Information File (ZI) ZI-2270 Adelante Eastside Redevelopment Project

CHECKLIST ITEMS

Attachment - Owner-Builder Declaration
Permit Flag - Not a Fire Life Safety Project
Attachment - Plot Plan
Std. Work Descr - Seismic Gas Shut Off Valve
Permit Flag - CUGU-Change of Use

PROPERTY OWNER, TENANT, APPLICANT INFORMATION

OWNER(S)
Agajanian, Daniel A Co Tr Agajanian Family Trust — 6572 Horseshoe Ln — HUNTINGTON BEACH CA 92648

TENANT

APPLICANT
Relationship: Agent for Owner
Larry Miner- — 15230 Burbank Bl Ste 103 — SH. OAKS, CA 91411 — (818) 267-5100

BUILDING RELOCATED FROM:

(C)ONTRACTOR, (A)RCHITECT & (E)NGINEER INFORMATION

NAME	ADDRESS	CLASS	LICENSE #	PHONE #
(O) , Owner-Builder	, -	NA	0	(310) 993-1676

SITE IDENTIFICATION-ALL

ADDRESS:
3720 E NOAKES ST 90023

LEGAL DESCRIPTION-ALL

TRACT	BLOCK	LOT(s)	ARB	CO.MAP REF #	PARCEL PIN	APN
P M 2445		B		BK 41-78	117A227 92	5192-017-008
TR 8337		9		M B 126-81/82	117A227 99	5192-017-008
TR 8337		LT B		M B 126-81/82	117A227 95	5192-018-015

Los Angeles Department of Building and Safety

Certificate Information: 3720 E NOAKES ST 90023

Application / Permit
16016-20000-24736

Plan Check / Job No.
B16VN14298

Group
Building

Type
Bldg-Alter/Repair

Sub-Type
Commercial

Primary Use
(23) Recycling Center or Site

Work Description
CHANGE OF USE FROM WAREHOUSE TO RECYCLING MATERIALS SORTING FACILITY AND RE-STRIPE PARKING - SEE COMMENTS

Permit Issued
Issued on 5/12/2017

Issuing Office
Valley

Current Status
CofO Issued on 3/9/2018

Certificate of Occupancy
CofO Issued

Permit Application Status History

Submitted	10/14/2016	APPLICANT
Disabled Access Plans Picked Up	10/27/2016	APPLICANT
Assigned to Plan Check Engineer	11/10/2016	MOURAD AZIZ
Corrections Issued	11/14/2016	MOURAD AZIZ
Reviewed by Supervisor	11/15/2016	GUANG MIN TUNG
Building Plans Picked Up	11/16/2016	APPLICANT
Applicant returned to address corrections	4/26/2017	MOURAD AZIZ
Plan Check Approved	5/2/2017	MOURAD AZIZ
Issued	5/12/2017	LADBS
CofO in Progress	3/9/2018	FELIX CEBALLOS
Permit Finaled	3/9/2018	HENRY BAGHDASSARIAN
CofO Issued	3/9/2018	HENRY BAGHDASSARIAN
Permit Finaled	3/9/2018	HENRY BAGHDASSARIAN

Permit Application Clearance Information

Miscellaneous	Cleared	2/21/2017	DANIEL SKOLNICK
ZI	Cleared	2/21/2017	DANIEL SKOLNICK
DAS Clearance	Cleared	2/23/2017	NORLITO MEDRANO
Eng Process Fee Ord 176,300	Cleared	3/6/2017	RAVIL MANAPOV
Low Impact Development	Cleared	3/6/2017	SAM NAVID
Sewer availability	Cleared	3/6/2017	RAVIL MANAPOV
Project located in CRA area	Cleared	3/8/2017	JIM URQUHART
CFC recycling	Cleared	5/2/2017	SCAQMD APPROVED

Contact Information

Contractor	Owner-Builder	,

Inspector Information

LANNY MERRICK, (213) 482-7277	Office Hours: 7:00-8:00 AM MON-FRI

Pending Inspections

No Data Available.

Inspection Request History

Pre-Inspection	9/19/2017	Approved	FELIX CEBALLOS
Final	2/13/2018	Not Ready for Inspection	FELIX CEBALLOS
Reinforced Masonry Frame	2/13/2018	Approved	FELIX CEBALLOS
SGSOV-Seismic Gas S/O Valve	2/13/2018	SGSOV No Gas	FELIX CEBALLOS
Smoke Detectors	2/13/2018	Approved	FELIX CEBALLOS
Final	2/16/2018	Conditional Approval	FELIX CEBALLOS

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

CERTIFICATE OF OCCUPANCY

OWNER AGAJANIAN, DANIEL A CO TR
AGAJANIAN FAMILY TRUST

6572 HORSESHOE LN
HUNTINGTON BEACH CA 92648

No building or structure or portion thereof and no trailer park or portion thereof shall be used or occupied until a Certificate of Occupancy has been issued thereof. Section

CERTIFICATE:	Issued-Valid	DATE:
BY:	HENRY L BAGHDASSARIAN	03/09/2018

SITE IDENTIFICATION

ADDRESS: **3720 E NOAKES ST 90023**

LEGAL DESCRIPTION

TRACT	BLOCK	LOT(s)	ARB	CO. MAP REF #	PARCEL PIN	APN
P M 2445		B		BK 41-78	117A227 92	5192-017-008

This certifies that, so far as ascertained or made known to the undersigned, the vacant land, building or portion of building described below and located at the above address(es) complies with the applicable construction requirements (Chapter 9) and/or the applicable zoning requirements (Chapter 1) of the Los Angeles Municipal Code for the use and occupancy group in which it is classified and is subject to any affidavits or building and zoning code modifications whether listed or not.

COMMENT USE OF LAND FOR OUTDOOR STORAGE (22,000 sq. ft.) ACCESSORY TO RECYCLING SORTING FACILITY.

USE	PRIMARY	OTHER
	Use of Land	(-) None

PERMITS

16020-20000-03077 | 16020-20001-03077 |

STRUCTURAL INVENTORY

ITEM DESCRIPTION	CHANGED	TOTAL
Floor Area (ZC)	0 Sqft	
Length		
Width		
U Occ. Group	0 Sqft	0 Sqft
Parking Req'd for Bldg (Auto+Bicycle)	0 Stalls	
Parking Req'd for Site (Auto+Bicycle)	6 Stalls	36 Stalls
Provided Offsite for Site	12 Stalls	12 Stalls
Total Provided Parking for Site	6 Stalls	36 Stalls

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

APPROVAL

CERTIFICATE NUMBER	162255
BRANCH OFFICE:	LA
COUNCIL DISTRICT:	14
BUREAU:	INSPECTN
DIVISION:	BLDGINSP
STATUS:	CofO Issued
STATUS BY:	HENRY L BAGHDASSARIAN
STATUS DATE:	03/09/2018
APPROVED BY:	HENRY L BAGHDASSARIAN
EXPIRATION DATE:	

Certificate No: *162255

PERMIT DETAIL

PERMIT NUMBER	PERMIT ADDRESS	PERMIT DESCRIPTION	STATUS - DATE - BY
16020-20000-03077	3720 E Noakes St	USE OF LAND FOR OUTDOOR STORAGE (22,000 sq. ft.) ACCESSORY TO RECYCLING SORTING FACILITY - SEE COMMENTS	CofO Issued - 03/09/2018 HENRY L BAGHDASSARIAN
16020-20001-03077	3720 E Noakes St	SUPPLEMENT TO PERMIT # 16020-20000-03077 TO INCREASE AREA OF OUTDOOR STORAGE TO 26,000.0 SQ. FT. ACCESSORY TO RECYCLE SORTING FACILITY. RE-LOCATE NINE PARKING STALL TO OFF-SITE (3719 E. NOAKES 16020-20001-03078) - SEE COMMENTS	Permit Finaled - 02/20/2018 FELIX CEBALLOS

PARCEL INFORMATION

Area Planning Commission: East Los Angeles	Census Tract: 2049.20	Certified Neighborhood Council: Boyle Heights
Community Plan Area: Boyle Heights	Council District: 14	District Map: 117A227
Energy Zone: 8	Fire District: 2	LADBS Branch Office: LA
Near Source Zone Distance: 1.5	Thomas Brothers Map Grid: 675-C2	Zone: M3-1-CUGU

PARCEL DOCUMENT

Affidavit (AFF) 20170448860 (OFF-SITE PARKING - 12 SPACES)	Affidavit (AFF) 20170448860 (OFF-SITE PARKING)	Affidavit (AFF) 20170448862 (LOT TIE)
Affidavit (AFF) 20170694604 (OFF-SITE PARKING - 9 SPACES)	City Planning Cases (CPC) CPC-1986-445-GPC	City Planning Cases (CPC) CPC-1995-336-CRA
City Planning Cases (CPC) CPC-2007-5599-CPU	City Planning Cases (CPC) CPC-2015-1462-CA	City Planning Cases (CPC) CPC-2016-2905-CPU
Community Development Block Grant (CDBG) LARZ-Central City	Community Development Block Grant (CDBG) SEZ-EAST LOS ANGELES STATE ENTERPRISE ZONE	Community Redevelopment Area (CRA) ZI 2270 ADELANTE EAST
Ordinance (ORD) ORD-166585-SA417011	Ordinance (ORD) ORD-184246	Parking Layout (PKLY) PKG-4421
Zoning Information File (ZI) ZI-2129 EAST LOS ANGELES STATE ENTERPRISE ZONE	Zoning Information File (ZI) ZI-2270 Adelante Eastside Redevelopment Project	Zoning Information File (ZI) ZI-2458 Clean Up Green Up Supplemental Use Distric

CHECKLIST ITEMS

Attachment - Owner-Builder Declaration

Attachment - Plot Plan

PROPERTY OWNER, TENANT, APPLICANT INFORMATION

OWNER(S)

Agajanian, Daniel A Co Tr Agajanian Family Trust	6572 Horseshoe Ln	HUNTINGTON BEACH CA 92648	(818) 267-5100
Agajanian, Daniel A Co Tr Agajanian Family Trust	6572 Horseshoe Ln	HUNTINGTON BEACH CA 92648	

TENANT

APPLICANT

Relationship: Agent for Owner

Larry Miner-	15230 Burbank Bl Ste 103	SH. OAKS, CA 91411	(818) 267-5100

BUILDING RELOCATED FROM:

(C)ONTRACTOR, (A)RCHITECT & (E)NGINEER INFORMATION

NAME	ADDRESS	CLASS	LICENSE #	PHONE #
(O) , Owner-Builder	, ,	NA	0	(310) 993-1676
(O) , Owner-Builder	, ,	NA	0	(818) 267-5100

SITE IDENTIFICATION-ALL

ADDRESS:

3720 E NOAKES ST 90023

LEGAL DESCRIPTION-ALL

TRACT	BLOCK	LOT(s)	ARB	CO.MAP REF #	PARCEL PIN	APN
P M 2445		B		BK 41-78	117A227 92	5192-017-008

Los Angeles Department of Building and Safety

Certificate Information: 3720 E NOAKES ST 90023

Application / Permit
16020-20000-03077

Plan Check / Job No.
B16VN14298

Group
Building

Type
Nonbldg-New

Sub-Type
Commercial

Primary Use
(61) Use of Land

Work Description
USE OF LAND FOR OUTDOOR STORAGE (22,000 sq. ft.) ACCESSORY TO RECYCLING SORTING FACILITY - SEE COMMENTS

Permit Issued
Issued on 5/12/2017

Issuing Office
Valley

Current Status
CofO Issued on 3/9/2018

Certificate of Occupancy
CofO Issued

Permit Application Status History

Submitted	10/14/2016	APPLICANT
Disabled Access Plans Picked Up	10/27/2016	APPLICANT
Assigned to Plan Check Engineer	11/10/2016	MOURAD AZIZ
Corrections Issued	11/14/2016	MOURAD AZIZ
Reviewed by Supervisor	11/15/2016	GUANG MIN TUNG
Building Plans Picked Up	11/16/2016	APPLICANT
Applicant returned to address corrections	4/26/2017	MOURAD AZIZ
Plan Check Approved	5/2/2017	MOURAD AZIZ
Issued	5/12/2017	LADBS
CofO in Progress	3/9/2018	FELIX CEBALLOS
CofO Issued	3/9/2018	HENRY BAGHDASSARIAN
Permit Finaled	3/9/2018	HENRY BAGHDASSARIAN

Permit Application Clearance Information

DAS Clearance	Cleared	2/23/2017	NORLITO MEDRANO
Eng Process Fee Ord 176,300	Cleared	3/6/2017	RAVIL MANAPOV
Highway dedication	Cleared	3/6/2017	RAVIL MANAPOV
Sewer availability	Cleared	3/6/2017	RAVIL MANAPOV
Project located in CRA area	Cleared	3/8/2017	CRAIG BULLOCK
Miscellaneous	Cleared	4/26/2017	STEVEN WECHSLER

Contact Information

Contractor	Owner-Builder	,

Inspector Information

LANNY MERRICK, (213) 482-7277	Office Hours: 7:00-8:00 AM MON-FRI

Pending Inspections

No Data Available.

Inspection Request History

Masonry Wall/Backfill	11/30/2017	Partial Approval	FELIX CEBALLOS
Final	12/14/2017	Conditional Approval	FELIX CEBALLOS
Final	2/20/2018	Conditional Approval	FELIX CEBALLOS

Los Angeles Department of Building and Safety

Certificate Information: 3720 E NOAKES ST 90023

Application / Permit	16020-20001-03077
Plan Check / Job No.	B17VN07258
Group	Building
Type	Nonbldg-Alter/Repair
Sub-Type	Commercial
Primary Use	(61) Use of Land
Work Description	SUPPLEMENT TO PERMIT # 16020-20000-03077 TO INCREASE AREA OF OUTDOOR STORAGE TO 26,000.0 SQ. FT. ACCESSORY TO RECYCLE SORTING FACILITY. RE-LOCATE NINE PARKING STALL TO OFF-SITE (3719 E. NOAKES 16020-20001-03078) - SEE COMMENTS
Permit Issued	Issued on 6/29/2017
Issuing Office	Valley
Current Status	Permit Finaled on 2/20/2018
Certificate of Occupancy	CofO Issued

Permit Application Status History

Submitted	5/19/2017	APPLICANT
Disabled Access Plans Picked Up	5/31/2017	APPLICANT
Assigned to Plan Check Engineer	6/1/2017	MOURAD AZIZ
Corrections Issued	6/6/2017	MOURAD AZIZ
Reviewed by Supervisor	6/6/2017	GUANG MIN TUNG
Building Plans Picked Up	6/6/2017	APPLICANT
Plan Check Approved	6/29/2017	MOURAD AZIZ
Issued	6/29/2017	LADBS
Permit Finaled	2/20/2018	FELIX CEBALLOS

Permit Application Clearance Information

Eng Process Fee Ord 176,300	Cleared	6/21/2017	LEE GUILBEAUX
Miscellaneous	Cleared	6/21/2017	ANNA VIDAL
Project located in CRA area	Cleared	6/21/2017	CRAIG BULLOCK
Sewer availability	Cleared	6/21/2017	LEE GUILBEAUX
DAS Clearance	Cleared	6/26/2017	NORLITO MEDRANO

Contact Information

Contractor	Owner-Builder	,

Inspector Information

LANNY MERRICK, (213) 482-7277	Office Hours: 7:00-8:00 AM MON-FRI

Pending Inspections

No Data Available.

Inspection Request History

Final	12/13/2017	Partial Inspection	JONATHAN QUACH
Final	2/20/2018	Permit Finaled	FELIX CEBALLOS

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

CERTIFICATE OF OCCUPANCY

OWNER AGAJANIAN, DANIEL A AND TAMARA

6572 HORSESHOE LN
HUNTINGTON BEACH CA 92648

No building or structure or portion thereof and no trailer park or portion thereof shall be used or occupied until a Certificate of Occupancy has been issued thereof. Section

CERTIFICATE:	Issued-Valid	DATE:
BY:	HENRY L BAGHDASSARIAN	03/08/2018

SITE IDENTIFICATION

ADDRESS: 3719 E NOAKES ST 90023

LEGAL DESCRIPTION

TRACT	BLOCK	LOT(s)	ARB	CO. MAP REF #	PARCEL PIN	APN
TR 8337		LT A		M B 126-81/82	117A227 11	5192-002-017

This certifies that, so far as ascertained or made known to the undersigned, the vacant land, building or portion of building described below and located at the above address(es) complies with the applicable construction requirements (Chapter 9) and/or the applicable zoning requirements (Chapter 1) of the Los Angeles Municipal Code for the use and occupancy group in which it is classified and is subject to any affidavits or building and zoning code modifications whether listed or not.

COMMENT USE OF LAND FOR OPEN PARKING LOT.

USE	PRIMARY	OTHER
	Use of Land	(-) None

PERMITS

16020-20000-03078 | 16020-20001-03078 |

STRUCTURAL INVENTORY

ITEM DESCRIPTION	CHANGED	TOTAL
Floor Area (ZC)	0 Sqft	
Type V-B Construction		
U Occ. Group	0 Sqft	
Parking Req'd for Bldg (Auto+Bicycle)	0 Stalls	
Parking Req'd for Site (Auto+Bicycle)	0 Stalls	
Provided Compact for Site	17 Stalls	
Provided Disabled for Site	15 Stalls	
Provided Standard for Site	122 Stalls	
Total Provided Parking for Site	12 Stalls	12 Stalls

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

APPROVAL

CERTIFICATE NUMBER	162256
BRANCH OFFICE:	LA
COUNCIL DISTRICT:	14
BUREAU:	INSPECTN
DIVISION:	BLDGINSP
STATUS:	CofO Issued
STATUS BY:	HENRY L BAGHDASSARIAN
STATUS DATE:	03/08/2018
APPROVED BY:	HENRY L BAGHDASSARIAN
EXPIRATION DATE:	

Certificate No: *162256

PERMIT DETAIL

PERMIT NUMBER	PERMIT ADDRESS	PERMIT DESCRIPTION	STATUS - DATE - BY
16020-20000-03078	3719 E Noakes St	USE OF LAND FOR OPEN PARKING LOT - SEE COMMENTS	CofO Issued - 03/08/2018 HENRY L BAGHDASSARIAN
16020-20001-03078	3719 E Noakes St	SUPPLEMENT TO PERMIT # 16020-20000-03078 TO RE-STRIPE NINE ADDITIONAL PARKING STALLS - SEE COMMENTS	Permit Finaled - 02/20/2018 FELIX CEBALLOS

PARCEL INFORMATION

Area Planning Commission: East Los Angeles
Community Plan Area: Boyle Heights
Energy Zone: 8
Near Source Zone Distance: 1.6
Zone: M3-1-CUGU
Census Tract: 2049.20
Council District: 14
Fire District: 2
Thomas Brothers Map Grid: 675-C1
Certified Neighborhood Council: Boyle Heights
District Map: 117A227
LADBS Branch Office: LA
Thomas Brothers Map Grid: 675-C2

PARCEL DOCUMENT

Affidavit (AFF) 20170448860 (OFF-SITE PARKING)
Affidavit (AFF) 20170448861 (LOT TIE)
Affidavit (AFF) 20170694604 (OFF-SITE PARKING - 9 SPACES)
City Planning Cases (CPC) CPC-1986-445-GPC
City Planning Cases (CPC) CPC-1995-336-CRA
City Planning Cases (CPC) CPC-2007-5599-CPU
City Planning Cases (CPC) CPC-2015-1462-CA
City Planning Cases (CPC) CPC-2016-2905-CPU
Community Development Block Grant (CDBG) LARZ-Central City
Community Development Block Grant (CDBG) SEZ-EAST LOS ANGELES STATE ENTERPRISE ZONE
Community Redevelopment Area (CRA) ZI 2270 ADELANTE EAST
Ordinance (ORD) ORD-166585-SA4170W
Ordinance (ORD) ORD-184246
Zoning Information File (ZI) ZI-2129 EAST LOS ANGELES STATE ENTERPRISE ZONE
Zoning Information File (ZI) ZI-2270 Adelante Eastside Redevelopment Project
Zoning Information File (ZI) ZI-2458 Clean Up Green Up Supplemental Use Distric

CHECKLIST ITEMS

Attachment - Owner-Builder Declaration
Attachment - Plot Plan
Storm Water - LID Project

PROPERTY OWNER, TENANT, APPLICANT INFORMATION

OWNER(S)

Agajanian, Daniel A And Tamara	6572 Horseshoe Ln	HUNTINGTON BEACH CA 92648	(818) 267-5100
Agajanian, Daniel A And Tamara	6572 Horseshoe Ln	HUNTINGTON BEACH CA 92648	

TENANT

APPLICANT

Relationship: Agent for Owner

Larry Miner- (818) 267-5100

BUILDING RELOCATED FROM:

(C)ONTRACTOR, (A)RCHITECT & (E)NGINEER INFORMATION

NAME	ADDRESS	CLASS	LICENSE #	PHONE #
(O) , Owner-Builder	, ,	NA	0	(310) 993-1676
(O) , Owner-Builder	, ,	NA	0	(818) 267-5100

SITE IDENTIFICATION-ALL

ADDRESS:

3719 E NOAKES ST 90023

LEGAL DESCRIPTION-ALL

TRACT	BLOCK	LOT(s)	ARB	CO.MAP REF #	PARCEL PIN	APN
TR 8337		LT A		M B 126-81/82	117A227 11	5192-002-017
UNION PACIFIC TRACT		LT H		M B 88-100	117A227 12	5192-002-017

Los Angeles Department of Building and Safety

Certificate Information: 3719 E NOAKES ST 90023

Application / Permit
16020-20000-03078

Plan Check / Job No.
B16VN14298

Group
Building

Type
Nonbldg-New

Sub-Type
Commercial

Primary Use
(61) Use of Land

Work Description
USE OF LAND FOR OPEN PARKING LOT - SEE COMMENTS

Permit Issued
Issued on 5/12/2017

Issuing Office
Valley

Current Status
CofO Issued on 3/8/2018

Certificate of Occupancy
CofO Issued

Permit Application Status History

Submitted	10/14/2016	APPLICANT
Disabled Access Plans Picked Up	10/27/2016	APPLICANT
Assigned to Plan Check Engineer	11/10/2016	MOURAD AZIZ
Corrections Issued	11/14/2016	MOURAD AZIZ
Reviewed by Supervisor	11/15/2016	GUANG MIN TUNG
Building Plans Picked Up	11/16/2016	APPLICANT
Applicant returned to address corrections	4/26/2017	MOURAD AZIZ
Plan Check Approved	5/2/2017	MOURAD AZIZ
Issued	5/12/2017	LADBS
CofO in Progress	2/20/2018	FELIX CEBALLOS
Permit Finaled	3/8/2018	HENRY BAGHDASSARIAN
CofO Issued	3/8/2018	HENRY BAGHDASSARIAN

Permit Application Clearance Information

DAS Clearance	Cleared	2/23/2017	NORLITO MEDRANO
Address approval	Cleared	3/6/2017	RAVIL MANAPOV
Eng Process Fee Ord 176,300	Cleared	3/6/2017	RAVIL MANAPOV
Highway dedication	Cleared	3/6/2017	RAVIL MANAPOV
Low Impact Development	Cleared	3/6/2017	SAM NAVID
Permit	Cleared	3/6/2017	RAVIL MANAPOV
Roof/Waste drainage to street	Cleared	3/6/2017	RAVIL MANAPOV
Project located in CRA area	Cleared	3/8/2017	CRAIG BULLOCK
Hydrant and Access approval	Cleared	3/9/2017	JOHN CONNEALLY
Prkng lot landscape/Water mgmt	Cleared	3/9/2017	ANNA VIDAL

Contact Information

Contractor	Owner-Builder	,

Inspector Information

LANNY MERRICK, (213) 482-7277	Office Hours: 7:00-8:00 AM MON-FRI

Pending Inspections

No Data Available.

Inspection Request History

Final	12/14/2017	Conditional Approval	FELIX CEBALLOS
Final	2/20/2018	Conditional Approval	FELIX CEBALLOS

APPENDIX J

WASTE REDUCTION MODEL RESULTS

GHG Emissions Analysis -- Summary Report

Version 15

GHG Emissions Waste Management Analysis for Clements

Prepared by: L Miner

Project Period for this Analysis: 01/01/22 to 01/01/23

Note: If you wish to save these results, rename this file (e.g., WARM-MN1) and save it. Then the "Analysis Inputs" sheet of the "WARM" file will be blank when you are ready to make another model run.

GHG Emissions from Baseline Waste Management ($MTCO_2E$): (23,775.71)

Material	Tons Recycled	Tons Landfilled	Tons Combusted	Tons Composted	Tons Anaerobically Digested	Total $MTCO_2E$
Corrugated Containers	-	2,920.00	-	NA	NA	326.24
HDPE	-	1,460.00	-	NA	NA	29.57
Mixed Metals	-	12,410.00	-	NA	NA	251.36
Concrete	-	69,350.00	NA	NA	NA	1,404.65
Dimensional Lumber	-	43,800.00	-	NA	NA	(40,447.71)
Drywall	-	1,460.00	NA	NA	NA	(89.12)
Mixed MSW	NA	51,100.00	-	NA	NA	14,749.30
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GHG Emissions from Alternative Waste Management Scenario ($MTCO_2E$): (167,090.36)

Material	Tons Source Reduced	Tons Recycled	Tons Landfilled	Tons Combusted	Tons Composted	Tons Anaerobically Digested	Total $MTCO_2E$	Change (Alt - Base) $MTCO_2E$
Corrugated Containers	-	2,920.00	-	-	NA	NA	(9,155.18)	(9,481.42)
HDPE	-	1,460.00	-	-	NA	NA	(1,107.34)	(1,136.91)
Mixed Metals	-	12,410.00	-	-	NA	NA	(54,494.30)	(54,745.66)
Concrete	NA	69,350.00	-	NA	NA	NA	(554.21)	(1,958.87)
Dimensional Lumber	-	43,800.00	-	-	NA	NA	(116,566.71)	(76,119.00)
Drywall	-	1,460.00	-	NA	NA	NA	38.09	127.21
Mixed MSW	NA	NA	51,100.00	-	NA	NA	14,749.30	0.00
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Total Change in GHG Emissions ($MTCO_2E$): (143,314.65)

Note: a negative value (i.e., a value in parentheses) indicates an emission reduction; a positive value indicates an emission increase.

a) For explanation of methodology, see the EPA WARM Documentation:
[Documentation Chapters for Greenhouse Gas Emission and Energy Factors Used in the Waste Reduction Model (WARM)]
-- available on the Internet at https://www.epa.gov/warm/documentation-chapters-greenhouse-gas-emission-and-energy-factors-used-waste-reduction-model

b) Emissions estimates provided by this model are intended to support voluntary GHG measurement and reporting initiatives.

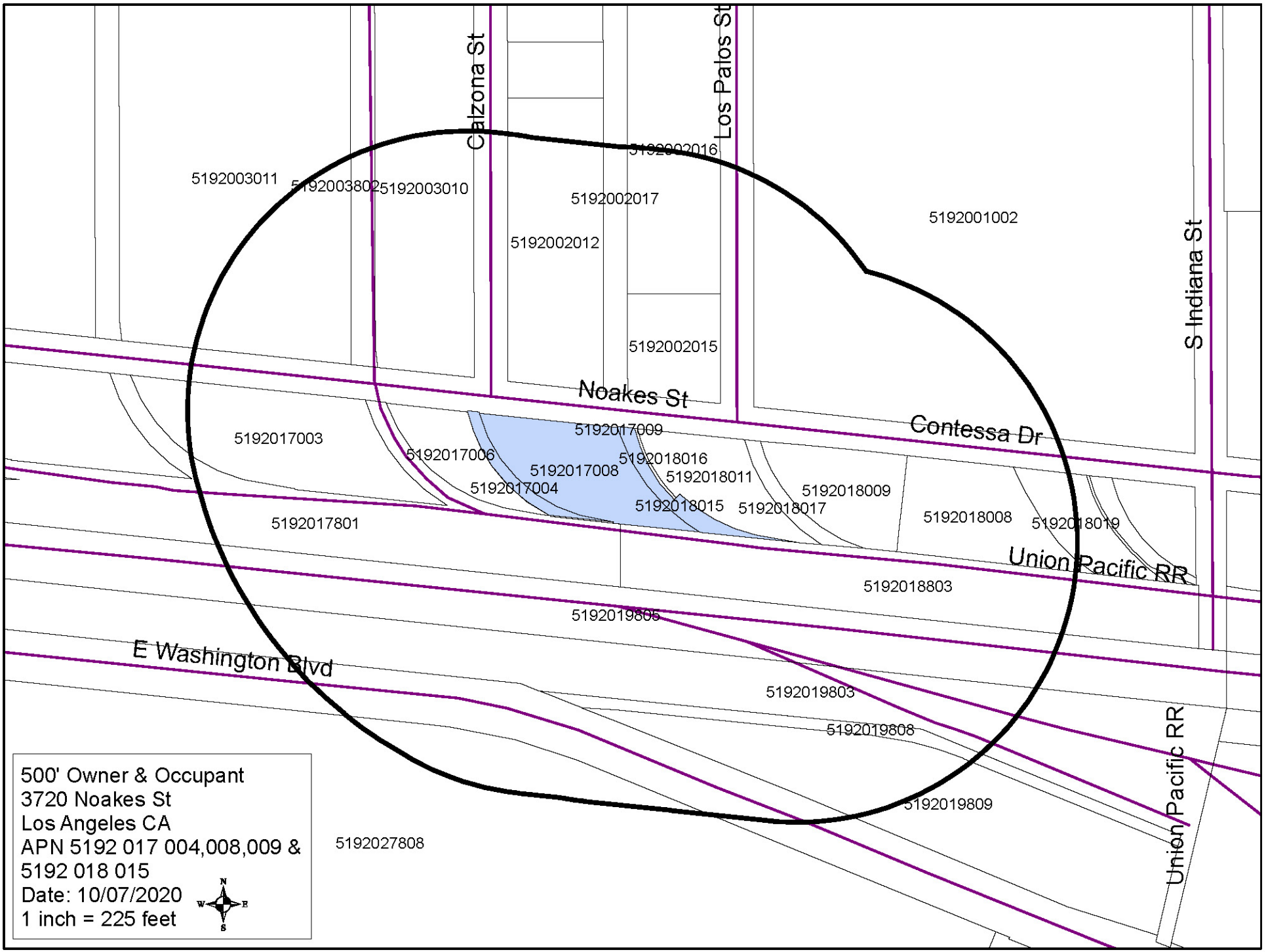
c) The GHG emissions results estimated in WARM indicate the full life-cycle benefits waste management alternatives. Due to the timing of the GHG emissions from the waste management pathways, (e.g., avoided landfilling and increased recycling), the actual GHG implications may accrue over the long-term. Therefore, one should not interpret the GHG emissions implications as occurring all in one year, but rather through time.

This is equivalent to...

Removing annual emissions from	**30,428**	Passenger Vehicles
Conserving	**16,126,325**	Gallons of Gasoline
Conserving	**5,971,444**	Cylinders of Propane Used for Home Barbeques
	0.00804%	Annual CO_2 emissions from the U.S. transportation sector
	0.00792%	Annual CO_2 emissions from the U.S. electricity sector

APPENDIX K

PUBLIC NOTICE DOCUMENTS AND MAILING LIST


Calzona St
Los Palos St
S Indiana St
Noakes St
Contessa Dr
Union Pacific RR
E Washington Blvd
Union Pacific RR
5192003011
5192003802
5192003010
5192002016
5192002017
5192002012
5192001002
5192002015
5192017003
5192017009
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5192018009
5192018015
5192018017
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5192017801
5192018803
5192019805
5192019803
5192019808
5192019809
5192027808
500' Owner & Occupant
3720 Noakes St
Los Angeles CA
APN 5192 017 004,008,009 &
5192 018 015
Date: 10/07/2020
1 inch = 225 feet
N
W
E
S

APN	Name	Street Address	City	State	Zip
5192 001 001	Chill Build Los Angeles LLC	6831 E 32nd St #300	Indianapolis	IN	46226
5192 002 012	1512 Calzona Street LLC	1525 Merriman Dr	Glendale	CA	91202
5192 002 015	Jai & Carolyn Sim	3245 Dora Verdugo Dr	Glendale	CA	91208
5192 002 016	B D & G Realty	5701 S Eastern Ave #100	Commerce	CA	90040
5192 002 017	Daniel & Tamara Agajanian	6572 Horseshoe Ln	Huntington Beach	CA	92648
5192 003 010	Adm Milling Co	4666 E Faries Pkwy	Decatur	IL	62526
5192 003 011	Adm Milling Co	4666 E Faries Pkwy	Decatur	IL	62526
5192 003 802	Union Pac R R Co	1400 Douglas St	Omaha NE	NE	68179
5192 017 003	Bkjk LLC	3263 Peppertree Pt	Chino Hills	CA	91709
5192 017 004	Adm Milling Co	4666 E Faries Pkwy	Decatur	IL	62526
5192 017 006	Buckaroo LLC	3029 Wilshire Blvd #200	Santa Monica	CA	90403
5192 017 008	Daniel Agajanian	6572 Horseshoe Ln	Huntington Beach	CA	92648
5192 017 009	Daniel & Tamara Agajanian	6572 Horseshoe Ln	Huntington Beach	CA	92648
5192 017 802	Union Pac R R Co	1400 Douglas St	Omaha	NE	68179
5192 018 008	G J W Company	3800 Noakes St	Los Angeles	CA	90023
5192 018 009	Kimberly Williams	8218 Pinositas Rd	Whittier	CA	90605
5192 018 011	Dart Warehouse Corp	1430 S Eastman Ave	Commerce	CA	90023
5192 018 013	Ppf Dedeaux Indl 4000 Noakes	1221 Avenue Of The Americas #35T	New York	NY	10020
5192 018 015	Daniel & Tamara Agajanian	6572 Horseshoe Ln	Huntington Beach	CA	92648
5192 018 016	Dart Warehouse Corp	1430 S Eastman Ave	Commerce	CA	90023
5192 018 017	Dart Warehouse Corp	1430 S Eastman Ave	Commerce	CA	90023
5192 018 803	Union Pac R R Co	1400 Douglas St	Omaha NE	NE	68179
5192 019 803	Union Pac R R Co	1400 Douglas St	Omaha NE	NE	68179
5192 019 805	Union Pac R R Co	1400 Douglas St	Omaha NE	NE	68179
5192 019 808	AT & S F Ry Co	3370 E 26th St	Los Angeles	CA	90023
5192 019 809	AT & S F Ry Co	3370 E 26th St	Los Angeles	CA	90023
5192 027 808	AT & S F Ry Co	3370 E 26th St	Los Angeles	CA	90023
5192 001 001	Occupant	1501 S Indiana St	Los Angeles	CA	90023
5192 001 001	Occupant	1523 S Indiana St	Los Angeles	CA	90023
5192 001 001	Occupant	3819 Noakes St	Los Angeles	CA	90023
5192 001 001	Occupant	3820 Union Pacific Ave	Los Angeles	CA	90023
5192 001 001	Occupant	3875 Noakes St	Los Angeles	CA	90023
5192 002 012	Occupant	1400 Calzona St	Los Angeles	CA	90023

5192 002 012	Occupant	1404 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1405 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1414 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1415 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1422 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1490 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1500 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1501 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1510 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1511 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1512 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1520 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1521 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1530 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1531 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1540 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1541 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1546 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1548 Calzona St	Los Angeles	CA	90023
5192 002 012	Occupant	1549 Calzona St	Los Angeles	CA	90023
5192 002 015	Occupant	1555 Los Palos St	Los Angeles	CA	90023
5192 002 016	Occupant	1501 Los Palos St	Los Angeles	CA	90023
5192 002 016	Occupant	1525 Los Palos St	Los Angeles	CA	90023
5192 002 016	Occupant	3730 Union Pacific Ave	Los Angeles	CA	90023
5192 003 010	Occupant	3691 Noakes St	Los Angeles	CA	90023
5192 003 010	Occupant	3716 Union Pacific Ave	Los Angeles	CA	90023
5192 003 010	Occupant	3760 Union Pacific Ave	Los Angeles	CA	90023
5192 003 010	Occupant	3780 Union Pacific Ave	Los Angeles	CA	90023
5192 003 011	Occupant	1521 Calada St	Los Angeles	CA	90023
5192 003 011	Occupant	1541 Calada St	Los Angeles	CA	90023
5192 003 011	Occupant	1542 Calada St	Los Angeles	CA	90023
5192 003 011	Occupant	1543 Calada St	Los Angeles	CA	90023
5192 003 011	Occupant	3654 Union Pacific Ave	Los Angeles	CA	90023
5192 003 011	Occupant	3657 Noakes St	Los Angeles	CA	90023

5192 003 011	Occupant	3658 Union Pacific Ave	Los Angeles	CA	90023
5192 003 011	Occupant	3675 Noakes St	Los Angeles	CA	90023
5192 017 003	Occupant	3656 Noakes St	Los Angeles	CA	90023
5192 017 003	Occupant	3674 Noakes St	Los Angeles	CA	90023
5192 017 006	Occupant	3690 Noakes St	Los Angeles	CA	90023
5192 017 006	Occupant	3700 Noakes St	Los Angeles	CA	90023
5192 017 006	Occupant	3748 Noakes St	Los Angeles	CA	90023
5192 017 008	Occupant	3720 Noakes St	Los Angeles	CA	90023
5192 018 009	Occupant	3750 Noakes St	Los Angeles	CA	90023
5192 027 808	Occupant	3730 E Washington Blvd	Vernon	CA	90058

ADDITIONAL MAILING LABELS FOR DIRECT DISPOSAL
500-FOOT RADIUS PUBLIC NOTICE

Councilmember Jose Huizar
200 N. Spring Street, Room 465
Los Angeles, CA 90012
Attn: Paul Habib, Chief of Staff

Supervisor Hilda Solis
856 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Boyle Heights Neighborhood Council
2130 East First Street, Suite 110
Los Angeles, CA 90033
Attn: Veronica Polanco, President

Senator Maria Elena Durazo
1808 W. Sunset Blvd.
Los Angeles, CA 90026

Assemblymember Miguel Santiago
320 West 4th Street, Room 1050
Los Angeles, CA 90013

Representative Jimmy Gomez
350 S. Bixel Street, #120
Los Angeles, CA 90017

Local Enforcement Agency
221 N. Figueroa Street, Room 1250
Los Angeles, CA 90012
Attn: Jose Gutierrez, LEA Program Supervisor

Clements Environmental, LLC
15230 Burbank Bl., Ste. 103
Sherman Oaks, CA 91411
Attn: Larry Miner, AICP CEP

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am a resident of Los Angeles County over the age of 18 and not a party to or interested in the mater notices.

I, Catherine Holloway,

hereby certify that the Los Angeles Downtown News is a newspaper of general circulation within the previsions of the Government Code of the State of California, printed and published in the City of Los Angeles, County of Los Angeles, State of California; that I am the principal clerk of the printer of said newspaper.

The notice, of which the annexed is a printed copy appeared in the:

LOS ANGELES DOWNTOWN NEWS
On the following dates:

7-29-2019

I certify (or declare) under penalty of perjury that the following is true and correct.

Dated in Los Angeles California on:

7-29-2019

Catherine Holloway

Signature

ment does not of itself authorize the use in this state of a fictitious business name in violation of the rights of another under federal, state, or common law (see Section 14411 et. seq. Business and Professions Code).

Pub. 7/29, 8/5, 8/12 and 8/19.

CITY OF LOS ANGELES ENVIRONMENTAL NOTICE

Notice is hereby given of the availability for public review and comment on the Direct Disposal, Inc. Draft Initial Study/Mitigated Negative Declaration (IS/MND), and Notice of the City of Los Angeles Department of Building and Safety Local Enforcement Agency's Intent to adopt a Mitigated Negative Declaration (MND) on the following project:

The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SW[illegible], to allow the expansion of an existing 175 ton per day (TPD) Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (reference CalRecycle Solid Waste Facility Permit No. 19-AR-1228) operated by Direct Disposal, Inc., and located at 3720 Noakes Street in the City of Los Angeles. The proposed SWFP will allow processing and transfer of up to 500 TPD of solid waste material. The 54,136 square foot site is currently developed with a one-story, 12,200 square foot clear-span building that houses the tipping area and processing equipment including mechanical screens and an elevated sort line. The site also contains a truck scale and associated 600 sf scale house/office as well as outdoor storage areas. Off-site surface parking is provided at 3719 Noakes Street. No new floor area is proposed as part of the project.

Printed copies of the IS/MND are available for review at the following locations: City of Los Angeles Local Enforcement Agency, 221 N. Figueroa Street, 12th floor, Los Angeles, CA 90012 tele. (213) 252-3348, and the Robert Louis Stevenson Branch Library, 803 Spence Street, Los Angeles, CA 90023, tel. (323) 268-4710.

Comments on the IS/MND may be mailed to: City of Los Angeles Department of Building and Safety Local Enforcement Agency, 221 N. Figueroa Street, Room 1250, Los Angeles, CA 90012, Attn: Jose Gutierrez, LEA Program Supervisor, (213) 252-3348, or sent via email to jose.gutierrez@lacity.org.

The review and comment period will end on August 23, 2019. Questions may be directed to Jose Gutierrez, LEA Program Supervisor at (213) 252-3348.

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
BUILDING AND SAFETY
201 NORTH FIGUEROA STREET
LOS ANGELES, CA 90012

FRANK M. BUSH
GENERAL MANAGER

OSAMA YOUNAN
EXECUTIVE OFFICER

CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY
LOCAL ENFORCEMENT AGENCY
NOTICE OF AVAILABILITY AND INTENT TO ADOPT
A MITIGATED NEGATIVE DECLARATION
for the
DIRECT DISPOSAL LARGE VOLUME SOLID WASTE TRANSFER/PROCESSING FACILITY PROJECT

NOTICE IS HEREBY GIVEN: Notice is hereby given of the availability for public review and comment on the Direct Disposal, Inc., Draft Initial Study/Mitigated Negative Declaration (IS/MND), and Notice of the City of Los Angeles Department of Building and Safety Local Enforcement Agency's Intent to adopt a Mitigated Negative Declaration (MND) on the following project:

PROJECT DESCRIPTION: The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow the expansion of an existing 175 ton per day (TPD) Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (reference CalRecycle Solid Waste Facility Permit No. 19-AR-1228) operated by Direct Disposal, Inc., and located at 3720 Noakes Street in the City of Los Angeles. The proposed SWFP will allow processing and transfer of up to 500 TPD of solid waste material. The 54,136 square foot site is currently developed with a one-story, 12,200 square foot clear-span building that houses the tipping area and processing equipment including mechanical screens and an elevated sort line. The site also contains a truck scale and associated 600 sf scale house/office as well as outdoor storage areas. Off-site surface parking is provided at 3719 Noakes Street. No new floor area is proposed as part of the project.

PROJECT LOCATION: The project site is located at 3720 Noakes St., Los Angeles, CA 90058

Public Review Period: The Draft IS/MND is being made available for a public review and comment period beginning July 29, 2019, and concluding on August 30, 2019. Comments on the Draft IS/MND must be received in writing no later than 5:00 PM, August 30, 2019.

Printed copies of the IS/MND are available for review at the following locations:

Local Enforcement Agency
221 N. Figueroa Street, Room 1250
Los Angeles, CA 90012
(213) 252-3348

Robert Louis Stevenson Branch Library
803 Spence Street
Los Angeles, CA 90023
(323) 268-4710

Comments on the IS/MND may be mailed or emailed to:

City of Los Angeles Department of Building and Safety Local Enforcement Agency
221 N. Figueroa Street, Room 1250
Los Angeles, CA 90012
Attn: Jose Gutierrez, LEA Program Supervisor (jose.gutierrez@lacity.org)

All comments received related to uses discussed in the IS/MND will be included in the final package that will be forwarded to the Environmental Affairs Officer, Local Enforcement Agency, of the City of Los Angeles Department of Building and Safety for final consideration. If you have any questions regarding the IS/MND, please contact Jose Gutierrez at (213) 252-3348.

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact' as indicated by the checklist on the following page.

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

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Signature _____ Date 7/22/19

David Thompson, REHS
Printed Name

APPENDIX L

AIR QUALITY ANALYSIS FROM FINAL IS/MND

Emissions from Material Unloading and Loading

Material Handling Emissions = k*(0.0032)*{[U/5)1.3]/[M/2)1.4}

Category/Variable	Value	Units
Operating Days	312	
Tons of Material Handled/Year	116688	
326 Tons of Material Handled/4x Day	1304	
k for PM10	0.35	
k for PM 2.5	0.053	
U mean wind speed (Assumed)	10	mph
M moisture content	2	%
Constant	0.0032	lb/ton
Calculated Emission Factor - PM 2.5	0.000417604	lb/ton
Calculated Emission Factor - PM 10	0.002757763	lb/ton

	Uncontrolled Emission lbs/day	Controlled Emissions lbs/day[1]
Calculated Emissions - PM 2.5	0.544555857	0.272277929
Calculated Emissions - PM 10	3.596123586	1.798061793

[1] Controlled emissions - abatement efficiency 50% with water application to control dust.

Source - U.S.E.P.A. *Compilation of Air Pollutant Emission Factors, Volume 1. Stationary Point and Area Sources ("AP-42") 5th Ed., November 2006, Section 12.2.4.*

Emissions Calculations - Loaders

Hp	2020 Composite
Hours of Operaton per Day	8
Number	3
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

	ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
Emission Factor, lb/hr	0.0753	0.4406	0.4747	0.0012	0.0235	0.023289	109	0.0068	
Emissions, lb/day	1.8072	10.5744	11.3928	0.0288	0.564	0.558924	2616	0.1632	6054

[1] PM 2.5 as a percentage of PM10 0.991

[2] Per EPA Greenhouse Gas Equivalencies Calculator - https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator

[3] Emission Factors Per SCAQMD Off-Road - Model Mobile Source Emission Factors for Model Year 2019 Equipment

Emissions Calculations - Bobcat (skid steer loader)

Hp	2020 Composite
Hours of Operaton per Day	11
Number	1
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

	ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
Emission Factor, lb/hr	0.0222	0.2125	0.1614	0.0004	0.005	0.004955	30.3	0.002	
Emissions, lb/day	0.2442	2.3375	1.7754	0.0044	0.055	0.054505	333.3	0.022	871

Emissions Calculations - Telehandler

Hp	(2020 Other Material Handling Equipment Composite)
Hours of Operaton per Day	11
Number	1
Vehicle Speed (mph)	0.5
Total Daily Miles	5
Days/year	312

	ROG	CO	NOx	SOx	PM10	PM2.5[1]	CO2	CH4	CO2e[2]
Emission Factor, lbs/hr[3]	0.0924	0.4495	0.65	0.0015	0.0252	0.024973	141	0.0083	
Emissions, lb/day	1.0164	4.9445	7.15	0.0165	0.2772	0.274705	1551	0.0913	3702

[1] PM 2.5 as a percentage of PM10 0.991

[2] Per EPA Greenhouse Gas Equivalencies Calculator - https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator

[3] Emission Factors Per SCAQMD Off-Road - Model Mobile Source Emission Factors for Model Year 2019 Equipment

Emissions Calculations - Excavators

Hp	2020 Composite
Hours of Operaton per Day	11
Number	2
Vehicle Speed (mph)	0.5
Total Daily Miles	2.5
Days/year	312

	ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
Emission Factor, lb/hr	0.0733	0.5124	0.4042	0.0013	0.0184	0.018234	120	0.0066	
Emissions, lb/day	1.6126	11.2728	8.8924	0.0286	0.4048	0.401157	2640	0.1452	5335

TOTAL OFF-ROAD EMISSIONS

ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
4.6804	29.1292	29.2106	0.0783	0.737	1.289291	7140.3	0.4217	15962

[1] PM 2.5 as a percentage of PM10 0.991

[2] Per EPA Greenhouse Gas Equivalencies Calculator - https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator

[3] Emission Factors Per SCAQMD Off-Road - Model Mobile Source Emission Factors for Model Year 2019 Equipment

Fugitive Dust Emissions from Onsite Vehicle Travel

Vehicle Traffic Emissions

PM10 Paved Road EF (lb/vmt)	0.079
PM10 Unpaved Road EF (lb/vmt)	0.93
PM2.5 Paved Road EF (lb/vmt)	0.016748
PM2.5 Unpaved Road EF (lb/vmt)	0.19716

Emissions Calculations - Offroad

		Unpaved MPD	PM10 Emissions, lbs/day	PM2.5 Emissions, lbs/day
Telehandler		5	4.65	0.9858
Excavator		3	2.79	0.59148
Loaders		10	9.3	1.9716
Skid Steer		3	2.79	0.550076
Customer Vehicles	109	20.6	19.158	4.061496
		TOTALS	38.688	8.160452
		Reduction from dust control with water - 50%	19.344	4.080226

Self Haul Trips Per Day	94
Transfer Truck Trips	15
Total Trips	109

Onsite tavel distance = 1,000 foot/trip

109 trips x 1,000 = 109,000

109,00 feet/5,280 = 20.6 mi

Direct

South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	54.00	1000sqft	1.24	54,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	12			**Operational Year**	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - No construction

Off-road Equipment - No construction

Trips and VMT - No construction

Vehicle Trips - Per traffic study

Operational Off-Road Equipment - Solid waste facility permit

Fleet Mix - Per traffic study

Direct - South Coast AQMD Air District, Winter

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.20
tblFleetMix	LDA	0.55	0.20
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LHD1	0.02	0.20
tblFleetMix	LHD2	5.8620e-003	0.20
tblFleetMix	MCY	4.7770e-003	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	9.5600e-004	0.00
tblFleetMix	MHD	0.02	0.20
tblFleetMix	OBUS	2.0370e-003	0.00
tblFleetMix	SBUS	7.0500e-004	0.00
tblFleetMix	UBUS	1.9440e-003	0.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperHorsePower	203.00	0.00
tblOperationalOffRoadEquipment	OperHorsePower	65.00	0.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.36	0.95
tblOperationalOffRoadEquipment	OperLoadFactor	0.37	0.95
tblVehicleTrips	CC_TL	8.40	20.00
tblVehicleTrips	CC_TTP	28.00	80.00
tblVehicleTrips	CNW_TTP	13.00	5.00
tblVehicleTrips	CW_TTP	59.00	15.00
tblVehicleTrips	DV_TP	5.00	2.50
tblVehicleTrips	PB_TP	3.00	2.50
tblVehicleTrips	PR_TP	92.00	95.00

tblVehicleTrips	ST_TR	1.50	5.07
tblVehicleTrips	SU_TR	1.50	0.00
tblVehicleTrips	WD_TR	1.50	5.07

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3643	22.7236	15.4213	0.0255	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649
2020	50.3249	20.9896	15.1358	0.0268	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,487.2050	2,487.2050	0.6009	0.0000	2,497.0851
Maximum	**50.3249**	**22.7236**	**15.4213**	**0.0268**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,504.3250**	**2,504.3250**	**0.6056**	**0.0000**	**2,519.4649**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3643	22.7236	15.4213	0.0255	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649
2020	50.3249	20.9896	15.1358	0.0268	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,487.2050	2,487.2050	0.6009	0.0000	2,497.0851
Maximum	**50.3249**	**22.7236**	**15.4213**	**0.0268**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,504.3250**	**2,504.3250**	**0.6056**	**0.0000**	**2,519.4649**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Total	**2.3766**	**25.3368**	**10.7331**	**0.0964**	**4.2804**	**0.2153**	**4.4957**	**1.2081**	**0.2066**	**1.4147**		**10,261.2090**	**10,261.2090**	**0.3929**	**5.7800e-003**	**10,272.7513**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Total	**2.3766**	**25.3368**	**10.7331**	**0.0964**	**4.2804**	**0.2153**	**4.4957**	**1.2081**	**0.2066**	**1.4147**		**10,261.2090**	**10,261.2090**	**0.3929**	**5.7800e-003**	**10,272.7513**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	12/31/2019	1/27/2020	5	20	
2	Site Preparation	Site Preparation	1/28/2020	1/29/2020	5	2	
3	Grading	Grading	1/30/2020	2/4/2020	5	4	
4	Building Construction	Building Construction	2/5/2020	11/10/2020	5	200	
5	Paving	Paving	11/11/2020	11/24/2020	5	10	
6	Architectural Coating	Architectural Coating	11/25/2020	12/8/2020	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 81,000; Non-Residential Outdoor: 27,000; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Direct - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Direct - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	23.00	9.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**		**2,360.7198**	**2,360.7198**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174
Total	**0.0693**	**0.0485**	**0.5270**	**1.4400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**143.6053**	**143.6053**	**4.4900e-003**		**143.7174**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**	**0.0000**	**2,360.7197**	**2,360.7197**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174
Total	**0.0693**	**0.0485**	**0.5270**	**1.4400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**143.6053**	**143.6053**	**4.4900e-003**		**143.7174**

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**		**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**	**0.0000**	**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**		**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**	**0.0000**	**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**		**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**	**0.0000**	**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	**0.0395**	**0.0266**	**0.2945**	**8.6000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**85.6292**	**85.6292**	**2.4600e-003**		**85.6906**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**		**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0310	0.9434	0.2507	2.2500e-003	0.0576	4.7500e-003	0.0624	0.0166	4.5400e-003	0.0211		239.8615	239.8615	0.0167		240.2779
Worker	0.1135	0.0766	0.8466	2.4700e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		246.1839	246.1839	7.0600e-003		246.3605
Total	**0.1445**	**1.0200**	**1.0973**	**4.7200e-003**	**0.3147**	**6.7000e-003**	**0.3214**	**0.0848**	**6.3400e-003**	**0.0911**		**486.0455**	**486.0455**	**0.0237**		**486.6384**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**	**0.0000**	**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0310	0.9434	0.2507	2.2500e-003	0.0576	4.7500e-003	0.0624	0.0166	4.5400e-003	0.0211		239.8615	239.8615	0.0167		240.2779
Worker	0.1135	0.0766	0.8466	2.4700e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		246.1839	246.1839	7.0600e-003		246.3605
Total	**0.1445**	**1.0200**	**1.0973**	**4.7200e-003**	**0.3147**	**6.7000e-003**	**0.3214**	**0.0848**	**6.3400e-003**	**0.0911**		**486.0455**	**486.0455**	**0.0237**		**486.6384**

3.6 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**		**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**	**0.0000**	**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	**0.0642**	**0.0433**	**0.4785**	**1.4000e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**139.1474**	**139.1474**	**3.9900e-003**		**139.2472**

3.7 Architectural Coating - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**		**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566
Total	**0.0247**	**0.0167**	**0.1840**	**5.4000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**53.5183**	**53.5183**	**1.5300e-003**		**53.5566**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**	**0.0000**	**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566
Total	**0.0247**	**0.0167**	**0.1840**	**5.4000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**53.5183**	**53.5183**	**1.5300e-003**		**53.5566**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Unmitigated	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	273.78	273.78	0.00	1,538,699	1,538,699
Total	273.78	273.78	0.00	1,538,699	1,538,699

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	16.60	20.00	6.90	15.00	80.00	5.00	95	2.5	2.5

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.200000	0.000000	0.000000	0.000000	0.200000	0.200000	0.200000	0.200000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
NaturalGas Unmitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2677.81	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2.67781	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Unmitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	0	8.00	300	0	0.95	Diesel
Skid Steer Loaders	0	8.00	300	0	0.95	Diesel

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Direct

South Coast AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	54.00	1000sqft	1.24	54,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	12			**Operational Year**	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - No construction

Off-road Equipment - No construction

Trips and VMT - No construction

Vehicle Trips - Per traffic study

Operational Off-Road Equipment - Solid waste facility permit

Fleet Mix - Per traffic study

Direct - South Coast AQMD Air District, Summer

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.20
tblFleetMix	LDA	0.55	0.20
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LHD1	0.02	0.20
tblFleetMix	LHD2	5.8620e-003	0.20
tblFleetMix	MCY	4.7770e-003	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	9.5600e-004	0.00
tblFleetMix	MHD	0.02	0.20
tblFleetMix	OBUS	2.0370e-003	0.00
tblFleetMix	SBUS	7.0500e-004	0.00
tblFleetMix	UBUS	1.9440e-003	0.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperHorsePower	203.00	0.00
tblOperationalOffRoadEquipment	OperHorsePower	65.00	0.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.36	0.95
tblOperationalOffRoadEquipment	OperLoadFactor	0.37	0.95
tblVehicleTrips	CC_TL	8.40	20.00
tblVehicleTrips	CC_TTP	28.00	80.00
tblVehicleTrips	CNW_TTP	13.00	5.00
tblVehicleTrips	CW_TTP	59.00	15.00
tblVehicleTrips	DV_TP	5.00	2.50
tblVehicleTrips	PB_TP	3.00	2.50
tblVehicleTrips	PR_TP	92.00	95.00

tblVehicleTrips	ST_TR	1.50	5.07
tblVehicleTrips	SU_TR	1.50	0.00
tblVehicleTrips	WD_TR	1.50	5.07

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3587	22.7194	15.4785	0.0256	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961
2020	50.3228	20.9858	15.1887	0.0270	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,511.3791	2,511.3791	0.6012	0.0000	2,521.2432
Maximum	**50.3228**	**22.7194**	**15.4785**	**0.0270**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,514.2483**	**2,514.2483**	**0.6059**	**0.0000**	**2,529.3961**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3587	22.7194	15.4785	0.0256	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961
2020	50.3228	20.9858	15.1887	0.0270	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,511.3791	2,511.3791	0.6012	0.0000	2,521.2432
Maximum	**50.3228**	**22.7194**	**15.4785**	**0.0270**	**5.8890**	**1.2874**	**6.7106**	**2.9774**	**1.2028**	**3.7333**	**0.0000**	**2,514.2483**	**2,514.2483**	**0.6059**	**0.0000**	**2,529.3961**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Total	**2.3622**	**24.7749**	**10.6719**	**0.0977**	**4.2804**	**0.2145**	**4.4949**	**1.2081**	**0.2058**	**1.4138**		**10,392.1672**	**10,392.1672**	**0.3810**	**5.7800e-003**	**10,403.4145**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Total	**2.3622**	**24.7749**	**10.6719**	**0.0977**	**4.2804**	**0.2145**	**4.4949**	**1.2081**	**0.2058**	**1.4138**		**10,392.1672**	**10,392.1672**	**0.3810**	**5.7800e-003**	**10,403.4145**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	12/31/2019	1/27/2020	5	20	
2	Site Preparation	Site Preparation	1/28/2020	1/29/2020	5	2	
3	Grading	Grading	1/30/2020	2/4/2020	5	4	
4	Building Construction	Building Construction	2/5/2020	11/10/2020	5	200	
5	Paving	Paving	11/11/2020	11/24/2020	5	10	
6	Architectural Coating	Architectural Coating	11/25/2020	12/8/2020	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 81,000; Non-Residential Outdoor: 27,000; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Direct - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Direct - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	23.00	9.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**		**2,360.7198**	**2,360.7198**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486
Total	**0.0637**	**0.0443**	**0.5841**	**1.5400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**153.5286**	**153.5286**	**4.8000e-003**		**153.6486**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475
Total	**2.2950**	**22.6751**	**14.8943**	**0.0241**		**1.2863**	**1.2863**		**1.2017**	**1.2017**	**0.0000**	**2,360.7197**	**2,360.7197**	**0.6011**		**2,375.7475**

3.2 Demolition - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486
Total	**0.0637**	**0.0443**	**0.5841**	**1.5400e-003**	**0.1453**	**1.1300e-003**	**0.1464**	**0.0385**	**1.0400e-003**	**0.0396**		**153.5286**	**153.5286**	**4.8000e-003**		**153.6486**

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**		**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	**2.1262**	**20.9463**	**14.6573**	**0.0241**		**1.1525**	**1.1525**		**1.0761**	**1.0761**	**0.0000**	**2,322.3127**	**2,322.3127**	**0.5970**		**2,337.2363**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**		**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	**1.6299**	**18.3464**	**7.7093**	**0.0172**	**5.7996**	**0.8210**	**6.6205**	**2.9537**	**0.7553**	**3.7090**	**0.0000**	**1,667.4119**	**1,667.4119**	**0.5393**		**1,680.8937**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**		**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	**1.3498**	**15.0854**	**6.4543**	**0.0141**	**4.9143**	**0.6844**	**5.5986**	**2.5256**	**0.6296**	**3.1552**	**0.0000**	**1,365.7183**	**1,365.7183**	**0.4417**		**1,376.7609**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	**0.0362**	**0.0243**	**0.3271**	**9.2000e-004**	**0.0894**	**6.8000e-004**	**0.0901**	**0.0237**	**6.2000e-004**	**0.0243**		**91.5534**	**91.5534**	**2.6300e-003**		**91.6192**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**		**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0296	0.9444	0.2249	2.3200e-003	0.0576	4.6800e-003	0.0623	0.0166	4.4800e-003	0.0211		247.0036	247.0036	0.0155		247.3913
Worker	0.1041	0.0700	0.9403	2.6400e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		263.2160	263.2160	7.5700e-003		263.4052
Total	**0.1336**	**1.0144**	**1.1652**	**4.9600e-003**	**0.3147**	**6.6300e-003**	**0.3213**	**0.0848**	**6.2800e-003**	**0.0910**		**510.2196**	**510.2196**	**0.0231**		**510.7965**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	**2.0305**	**14.7882**	**13.1881**	**0.0220**		**0.7960**	**0.7960**		**0.7688**	**0.7688**	**0.0000**	**2,001.1595**	**2,001.1595**	**0.3715**		**2,010.4467**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0296	0.9444	0.2249	2.3200e-003	0.0576	4.6800e-003	0.0623	0.0166	4.4800e-003	0.0211		247.0036	247.0036	0.0155		247.3913
Worker	0.1041	0.0700	0.9403	2.6400e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		263.2160	263.2160	7.5700e-003		263.4052
Total	**0.1336**	**1.0144**	**1.1652**	**4.9600e-003**	**0.3147**	**6.6300e-003**	**0.3213**	**0.0848**	**6.2800e-003**	**0.0910**		**510.2196**	**510.2196**	**0.0231**		**510.7965**

3.6 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**		**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8402**	**8.4514**	**8.8758**	**0.0135**		**0.4695**	**0.4695**		**0.4328**	**0.4328**	**0.0000**	**1,296.9461**	**1,296.9461**	**0.4111**		**1,307.2246**

3.6 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	**0.0588**	**0.0395**	**0.5315**	**1.4900e-003**	**0.1453**	**1.1000e-003**	**0.1464**	**0.0385**	**1.0200e-003**	**0.0396**		**148.7743**	**148.7743**	**4.2800e-003**		**148.8812**

3.7 Architectural Coating - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**		**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620
Total	**0.0226**	**0.0152**	**0.2044**	**5.7000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**57.2209**	**57.2209**	**1.6500e-003**		**57.2620**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	**50.3002**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**	**0.0000**	**281.4481**	**281.4481**	**0.0218**		**281.9928**

3.7 Architectural Coating - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620
Total	**0.0226**	**0.0152**	**0.2044**	**5.7000e-004**	**0.0559**	**4.2000e-004**	**0.0563**	**0.0148**	**3.9000e-004**	**0.0152**		**57.2209**	**57.2209**	**1.6500e-003**		**57.2620**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Unmitigated	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	273.78	273.78	0.00	1,538,699	1,538,699
Total	273.78	273.78	0.00	1,538,699	1,538,699

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	16.60	20.00	6.90	15.00	80.00	5.00	95	2.5	2.5

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.200000	0.000000	0.000000	0.000000	0.200000	0.200000	0.200000	0.200000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
NaturalGas Unmitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2677.81	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2.67781	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		**0.0289**	**0.2625**	**0.2205**	**1.5800e-003**		**0.0200**	**0.0200**		**0.0200**	**0.0200**		**315.0363**	**315.0363**	**6.0400e-003**	**5.7800e-003**	**316.9084**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Unmitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	**1.2069**	**5.0000e-005**	**5.5500e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**		**0.0118**	**0.0118**	**3.0000e-005**		**0.0126**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	0	8.00	300	0	0.95	Diesel
Skid Steer Loaders	0	8.00	300	0	0.95	Diesel

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation