

**FINAL INITIAL
STUDY/MITIGATED NEGATIVE
DECLARATION**

**DIRECT DISPOSAL LARGE
VOLUME SOLID WASTE
TRANSFER/PROCESSING
FACILITY**

SCH No. 2019079096

Lead Agency:
City of Los Angeles Local Enforcement Agency
221 N. Figueroa Street, Rm. 1250
Los Angeles, CA 90012
(213) 252-3348

April 2020

Notice of Determination

Appendix D

To:

Office of Planning and Research
U.S. Mail: Street Address:
P.O. Box 3044 1400 Tenth St., Rm 113
Sacramento, CA 95812-3044 Sacramento, CA 95814

County Clerk
County of: Los Angeles
Address: 12400 Imperial Highway
Norwalk, CA 90650

From:

Public Agency: City of LA, LEA
Address: 221 N. Figueroa St., Rm. 1250
Los Angeles, CA 90012
Contact: Dave Thompson, Env. Affairs Officer
Phone: (213) 252-3932

Lead Agency (if different from above):
Address:
Contact:
Phone:

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse): 2019079096

Project Title: Direct Disposal Large Volume Solid Waste Transfer/Processing Facility

Project Applicant: Direct Disposal, Inc.

Project Location (include county): 3720 Noakes, Street, City of Los Angeles/Los Angeles County

Project Description:

The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow up to 500 TPD of construction, demolition and inert (CDI) material to be processed and transferred at the Direct Disposal facility. Of the 500 TPD permitted throughput, the facility will be permitted to receive and transfer up to 100 TPD of municipal solid waste.

This is to advise that the City of Los Angeles Local Enforcement Agency has approved the above (Lead Agency or Responsible Agency)

described project on (date) and has made the following determinations regarding the above described project.

- 1. The project will not have a significant effect on the environment.
2. An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA. A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan was adopted for this project.
5. A statement of Overriding Considerations was adopted for this project.
6. Findings were made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:

Local Enforcement Agency LADBS Environmental Affairs Division, 221 N. Figueroa St. LA CA 90012

Signature (Public Agency): Title:

Date: Date Received for filing at OPR:

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (Division 13, Public Resources Code)

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 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. The proposed Large Volume SWFP will allow up to 500 TPD of CDI and solid waste to be processed and transferred at the Direct Disposal facility. Of the 500 TPD permitted capacity, up to 100 TPD may be Municipal Solid Waste (MSW).

Determination

Based on the analysis provided in this Initial Study/Mitigated Negative Declaration (IS/MND), the Local Enforcement Agency (LEA) finds that, with incorporation of described revisions to the Project and mitigation measures, the proposed Project would not have a significant effect on the environment.

ORGANIZATION OF THE FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This Final IS/MND has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] 21000 et. seq.) and the CEQA Guidelines (California Code of Regulations [CCR] 15000 et. seq.). This Final IS/MND is organized into the following sections:

Clarifications and Modifications: provides a detailed description of all clarifications and modifications that were made to the text or graphics of the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Clarifications and modifications reflect changes made to the proposed Project, analysis, or mitigation measures due to editorial changes or as a result of a comment made by an agency or individual during the public review period. These clarifications and modifications do not constitute significant new information and do not change any of the conclusions of the document. This section also reflects changes necessary to combine the Draft IS/MND into this Final IS/MND.

Response to Comments on the Draft IS/MND: provides a list of agencies, organizations, and individuals commenting on the Draft IS/MND; copies of the written comments received during the Draft IS/MND public review period; and the lead agency responses to those comments.

Draft IS/MND: Appendix A contains the Draft IS/MND in its entirety, as was circulated during the public review period, which ran from July 29, 2019 through August 30, 2019.

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Appendices

Appendix A – Draft Initial Study/Mitigated Negative Declaration

CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft IS/MND in response to the comments received during the public review period. These changes constitute the Final IS/MND, to be considered by the City of Los Angeles Local Enforcement Agency for adoption. None of the changes to the IS/MND would require recirculation of the document. Revisions made to the IS/MND have not resulted in new significant impacts or mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and recirculation of the IS/MND is not warranted.

The changes to the IS/MND are listed by section, page number, and paragraph number if applicable. Text which has been removed is shown with a strikethrough line, while text that has been added is shown as underlined.

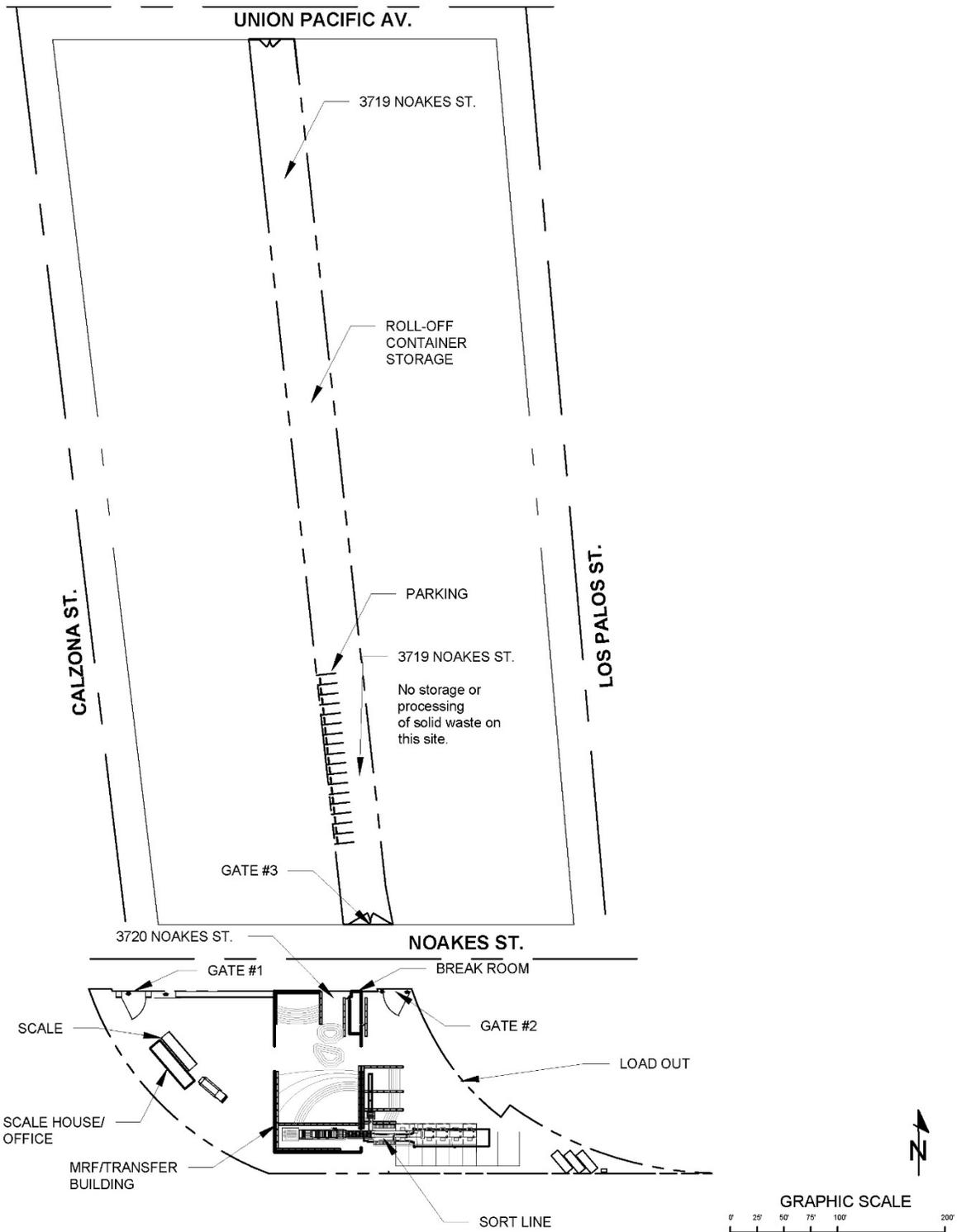
Page No.	Clarification/Revision
3	<p>Section 1.6 “Proposed Project” - the following revision is made to the first sentence of the first paragraph:</p> <p>The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow expansion of the existing 175 ton per day (TPD) <u>Direct Disposal</u> 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.</p>
3	<p>Section 1.6 “Proposed Project” - the following revision is made to the third sentence of the third paragraph:</p> <p>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 COB <u>C&D</u> material, adding screens, increasing bunker capacities and extending the sort line.</p>
3	<p>Section 1.6 “Proposed Project” - the following revision is made to the first sentence of the fourth paragraph of the Draft IS/MND:</p> <p>Future improvements may also include a vehicle queuing lane, a truck scale, scale house and <u>relocation of the office trailer offices at</u> to the 3719 Noakes Street property which will free up additional space at 3720 Noakes Street for material storage and processing. <u>The site will not be used for customer queuing, or storage/processing of MSW.</u></p>

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Clarification/Revision

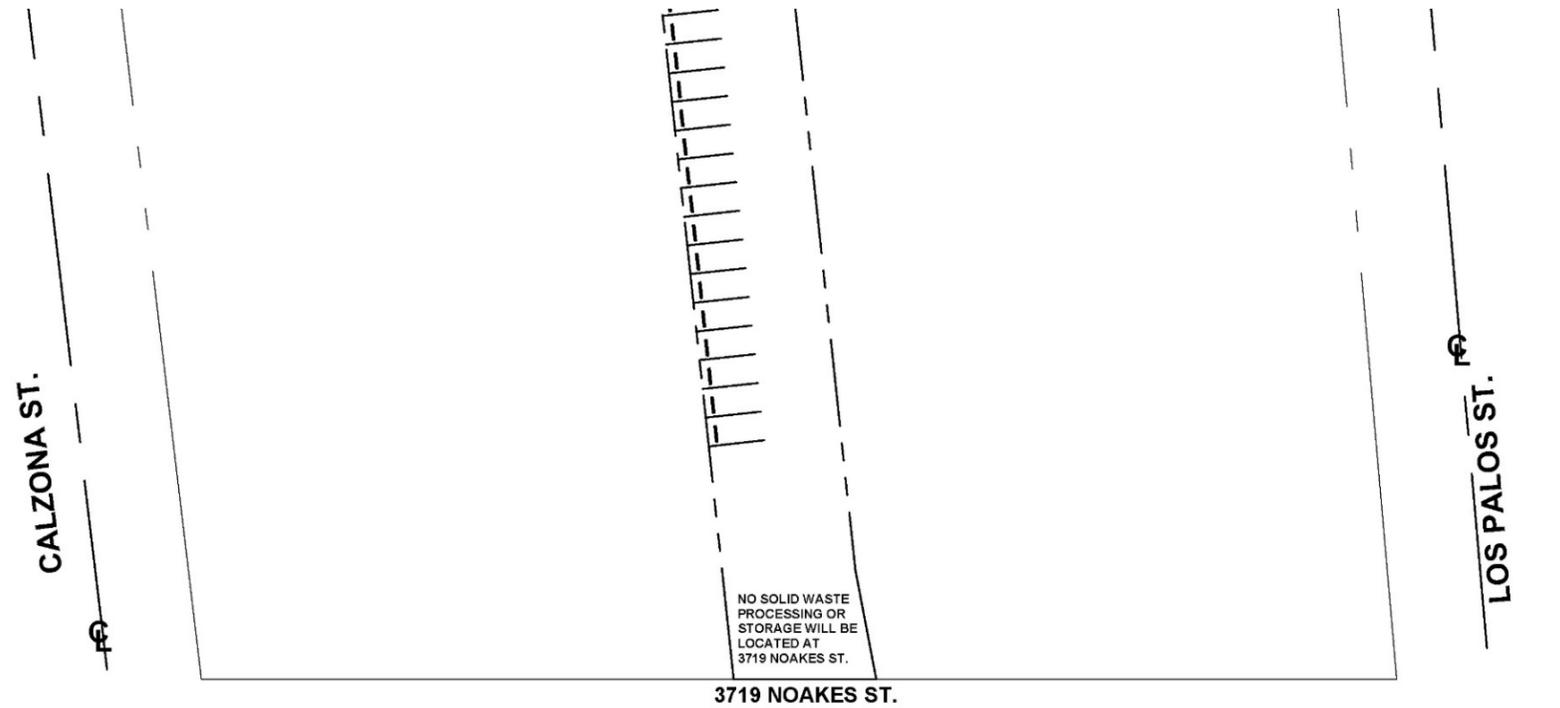
4

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.



Page No. Clarification/Revision

5 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. A note has also been added to indicate that no solid waste processing or storage will occur on the 3719 Noakes Street property.



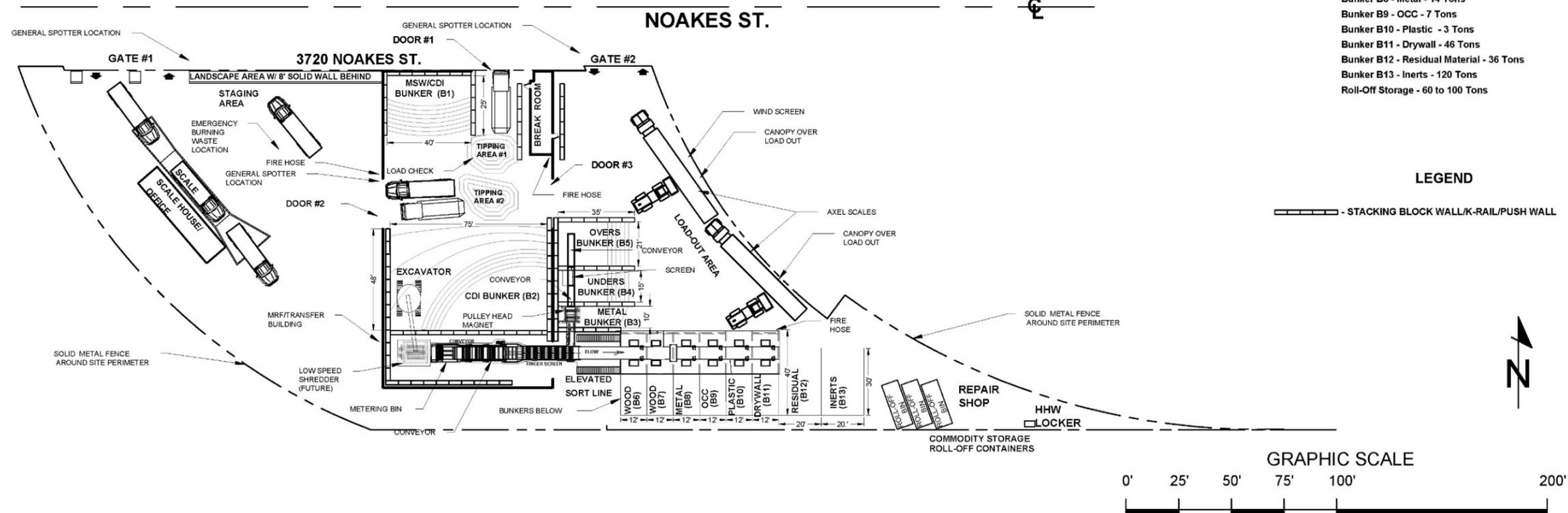
NOTES

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



Page No.

Clarification/Revision

6

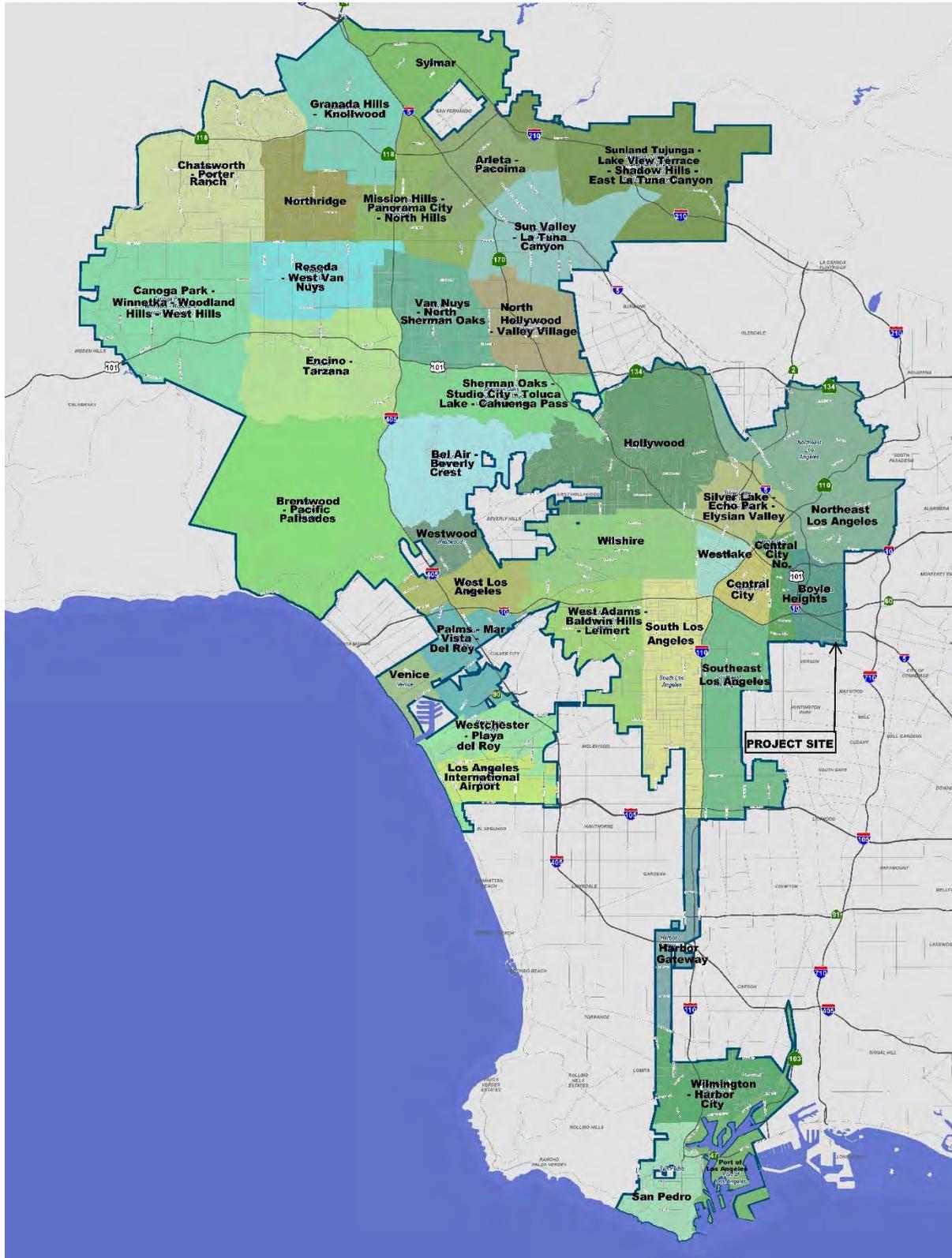
Section 1.6, “Proposed Project”. The following revision is made to the second sentence of the fifth paragraph of the Draft IS/MND: “The TPR has been prepared in accordance with Title 14, Section ~~18221~~ 18221.6 of the California Code of Regulations (CCR), which lists the specific requirements for inclusion in a TPR.

Page No.

Clarification/Revision

7

Figure 4 “City-Wide Community Plan Map” is replaced by this higher resolution exhibit.

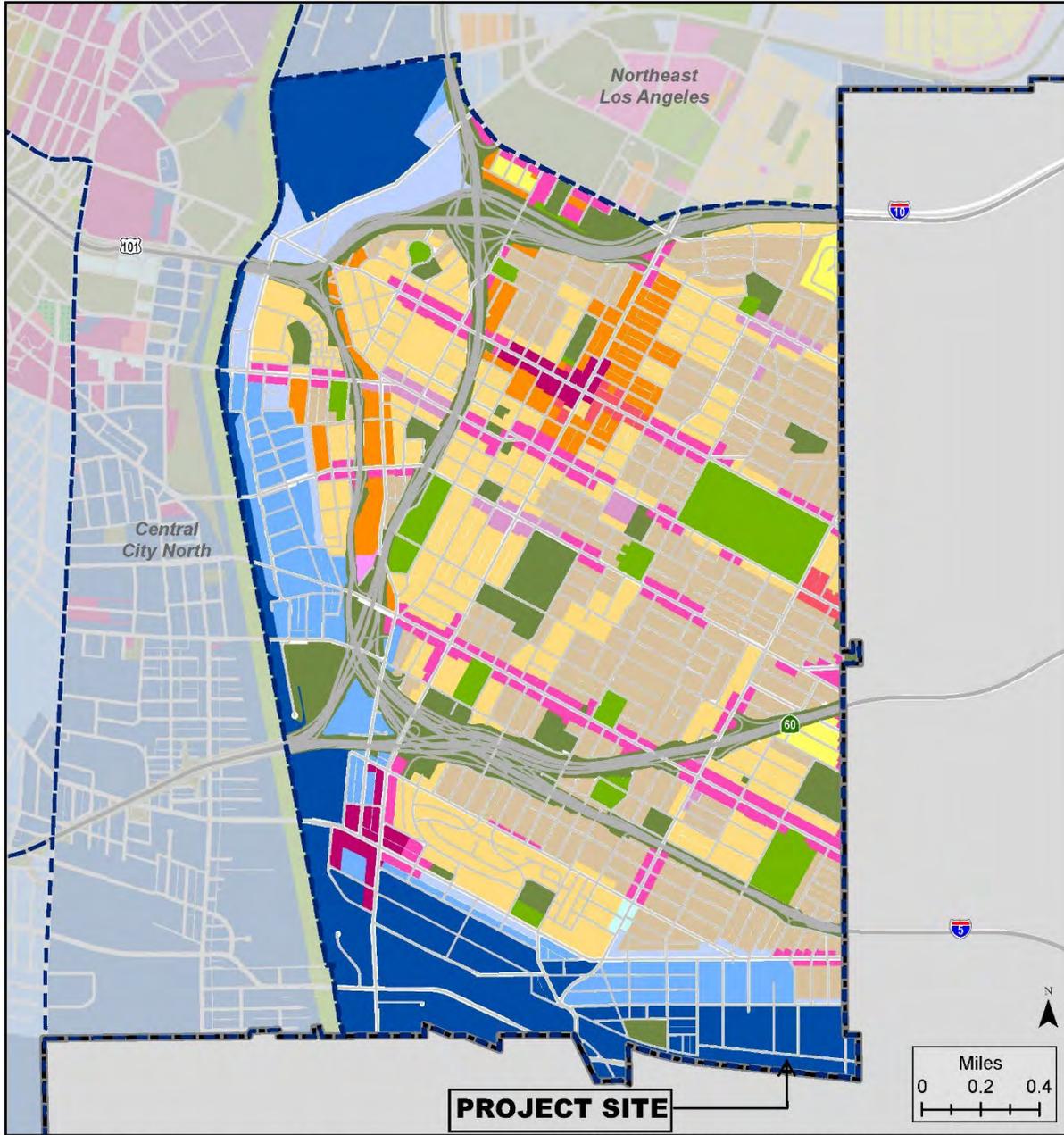


Page No.

Clarification/Revision

8

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



General Plan Land Use

Boyle Heights Community Plan Area

- | | | | |
|---------------------------|----------------------------------|--------------------------------|--------------------------------|
| - City Boundary | - Medium | - Highway Oriented and Limited | - Open Space |
| - Community Plan Boundary | - Community Commercial | - Commercial Manufacturing | - Public Facilities |
| - Low | - Neighborhood Office Commercial | - Light Manufacturing | - Public Facilities - Freeways |
| - Low Medium I | - Regional Center Commercial | - Limited Manufacturing | |
| - Low Medium II | - Highway Oriented Commercial | - Heavy Manufacturing | |



Page No.

Clarification/Revision

9 Section 1.7, “General Plan and Zoning” Reformat the second paragraph to make the second bullet point a separate paragraph, to reads as follows:

Los Angeles Municipal Code (LAMC) Section 12.21 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.

9 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.

13 Under “Environmental Factors Potentially Affected”, the paragraph is revised to read: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Unless Mitigation Incorporated ~~Impact~~ as indicated by the checklist on the following pages.

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

Page No.	Clarification/Revision
19	<p>Section 3.3.b “Air Quality” regarding the project’s potential to “violate any air quality standard or contribute substantially to an existing or projected air quality violation” is revised from “Less Than Significant Impact” to “Potentially Significant Unless Mitigation Incorporated” as mitigation measures were proposed at the time the Draft IS/MND was circulated.</p>
19	<p>Section 3.3.b “Air Quality” has been supplemented with an air quality analysis using the California Emission Estimator Model (CalEEMod) version 2016.3.2 as well as the AQMD’s “Off-Road – Model Mobile Source Emission Factors”. Detailed worksheets are included in Appendix CM1 of this Final IS/MND, and the following is added after the second paragraph under Section 3.3.b:</p> <p><u>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 Table CM-1, operational emissions would not exceed SCAQMD’s regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, the proposed project’s operational impacts on regional air quality are considered less than significant.</u></p> <p><u>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 Table CM-1, Estimated Daily Operational Emissions – operational emissions would not exceed LSTs significance thresholds for NO_x, CO, PM₁₀, and PM_{2.5} emissions. Therefore, the proposed project’s operational impacts on LSTs are considered less than significant.</u></p>
21	<p>Section 3.3.e “Air Quality” regarding the project’s potential to “create objectionable odors affecting a substantial number of people” is revised from “Less Than Significant Impact” to “Potentially Significant unless Mitigation Incorporated” as mitigation measures were proposed at the time the Draft IS/MND was circulated.</p>

TABLE CM-1 - PROJECT OPERATIONAL EMISSIONS
(With Mitigation Measures Incorporated)

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

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.

Page No.	Clarification/Revision
21	<p>Section 3.3.e “Air Quality”, mitigation measure AQ10 is revised as follows:</p> <p>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.”</p> <p>Section 3.3.e “Air Quality”, mitigation measure AQ11 is revised as follows:</p> <p>Regular site inspections will be conducted by site supervisor(s) to assure that all organic matter <u>MSW</u> is removed as required, the facility is cleaned on a daily basis and to minimize any other source for odors on site.</p>
34	<p>Section 3.13.a “Public Services”, regarding the project’s potential to “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” is revised from “Less Than Significant Impact” to “Potentially Significant Unless Mitigation Incorporated” as mitigation measures were proposed at the time the Draft IS/MND was circulated.</p>
38	<p>Section 3.16.f “Utilities and Service Systems”, regarding to the project’s impact on landfill capacity, is revised as follows:</p> <p>The proposed project would increase the maximum daily tonnage from 175 TPD to 400 <u>500</u> 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.</p>
38	<p>Per CalRecycle’s comment CR2, the of the Draft IS/MND Checklist under Section 3.16 (Utilities and Service Systems), Subsection “g”, regarding to the project’s compliance “with federal, state, and local statutes and regulations related to solid waste”, is revised from “Less Than Significant Impact” to “Potentially Significant Unless Mitigation Incorporated” as mitigation measures were proposed at the time the Draft IS/MND was circulated.</p>

**TPR
Appendix A
Page Nos.**

Clarification/Revision

2, 3 and 10

Air Quality Mitigation Measures A10 and A11 in Table A-1 and Table A-2 of Appendix A of the Draft IS/MND are revised to read:

- A10. 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.
- A11. 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.

T P R

Appendix A

Page No.

Clarification/Revision

14

Table A-2 of Appendix A of the Draft IS/MND is revised to include mitigation measure HHM6, which was omitted from the table, to read as follows:

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion	No.	Mitigation Measure
<u>HHM6</u>	<u>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.</u>	<u>The facility manager will maintain records regarding load checks and associated training.</u>	<u>Facility Operator</u>	<u>Ongoing</u>		<u>Load checks and associated training will be conducted as required under the Solid Waste Facility Permit.</u> <u>Less than significant</u>

TPR
Appendix A
Page No.

Clarification/Revision

16

Per CalRecycle’s comment CR-11, Mitigation Measure N-1 is corrected to read: “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 creation of noise beyond certain levels at adjacent uses unless technically infeasible.”

APPENDIX CM-I

**AIR QUALITY MODELING
WORKSHEETS**

Emissions from Material Unloading and Loading

$$\text{Material Handling Emissions} = k * (0.0032) * \left\{ \frac{[U/5]^{1.3}}{[M/2]^{1.4}} \right\}$$

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

PM10 Emissions, lbs/day PM2.5 Emissions, lbs/day

Emissions Calculations - Offroad ^

		Unpaved MPD		
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 travel distance = 1,000 foot/trip
 109 trips x 1,000 = 109,000

109,000 feet/5,280 = 20.6 mi

Direct - South Coast AQMD Air District, Summer

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/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

	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
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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

	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

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	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

Land Use	Miles			Trip %			Trip Purpose %		
	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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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

Direct - South Coast AQMD Air District, Summer

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
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Direct - South Coast AQMD Air District, Winter

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/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

	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
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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

	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

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	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

Land Use	Miles			Trip %			Trip Purpose %		
	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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

Direct - South Coast AQMD Air District, Winter

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

RESPONSE TO COMMENTS ON THE DRAFT IS/MND

RESPONSE TO COMMENTS ON THE DRAFT IS/MND

A. INTRODUCTION

The Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Draft IS/MND was circulated for public review and comment by the City of Los Angeles on July 29, 2019, initiating a 30-day public review period pursuant to CEQA and its implementing guidelines. The Notice of Intent/Notice of Availability was also distributed to relevant agencies and organizations, as well as property owners and occupants within 500 feet of the project site. Additionally, the IS/MND was available for review at the Robert Louis Stevenson Branch Library, Council District 14 Office, and the LEA offices. The IS/MND was also available online at the LEA website.

During this public review period, five (5) comment letters and one (1) comment email were received, as shown in **Table RTC-1** on the following page. Each comment letter has been assigned a number code, and individual comments in each letter have been coded to facilitate responses. For example, the letter from the California Department Resources Recovery and Recycling (CalRecycle) is identified as Letter CR, with comments noted as CR-1, CR-2, CR-3, etc. Copies of each comment letter are provided prior to the response to each letter. Comments that raise issues not directly related to the substance of the environmental analysis in the IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

B. RESPONSES TO WRITTEN COMMENTS

The written comment letters received on the Draft IS/MND are listed in Table RTC-1. The comments and associated responses are arranged by the date of receipt of the comment letter or email. The individual comments in the letters have been numbered and are referred to in the responses that directly follow the comment letter.

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	RTC-3
AF	Letter from April Fitzpatrick, Manager 1512 Calzona Street, LLC Email from April Fitzpatrick, Manager 1512 Calzona Street, LLC	August 20, 2019	RTC-9
BC	Letter from Blum Collins LLP, Hannah Bentley Of Counsel 707 Wilshire Boulevard, Suite 4880 Los Angeles, CA 90017	August 27, 2019	RTC-21
C	Letter from Public Utilities Commission Chi Cheung To, Senior Utilities Engineer Specialist, Rail Crossings and Engineering Branch, Rail Safety Division 320 West 4 th Street, Suite 500 Los Angeles, CA 90013	August 29, 2019	RTC-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	RTC-40

California Environmental Protection Agency

Gavin Newsom
California Governor



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for
Environmental Protection
Scott Smithline
CalRecycle Director

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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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 comply with the City of Los Angeles Noise Ordinance..." This should be restated as "The project shall comply with the City of Los Angeles Noise Ordinance..."

CR11

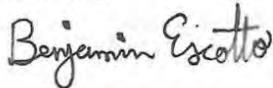
CONCLUSION

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, 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– Comment noted. The language under “Environmental Factors Potentially Affected” has been revised as recommended and those potential environmental effects requiring mitigation measures have been checked. See page CM-7.

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 Clarifications and Modifications section revises the Draft IS/MND checklist to reflect that the impacts for Air Quality (3.3 b), Air Quality (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 page CM-8. 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 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. See page CM-1. 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 (page CM-3). The Clarifications and Modifications section eliminates the references to greenwaste and organic material in Section 3.3 (Air Quality), Subsection “e”, (see

page CM-10) and from the mitigation monitoring and reporting program (Appendix A) AQ 10 and AQ11 (see page CM-11). 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 – CM-1 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 on page CM-3 (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 CM-4 (MND-6).

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. See page CM-6 (MND-7).

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 of the Final IS/MND. See page CM-7 (MND-9).

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. Table A-2 of Appendix A of the Clarifications and Modifications Section of the Final IS/MND has been revised to include mitigation measure HHM6. See page CM-12.

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. “company” has been changed to “comply” in regard to mitigation measure number N1 in Table A-2 of Appendix A of the Draft IS/MND. See page CM-13 (MMRP-16).

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.

AF-5

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.

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. 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.

As shown in **Table CM-1**, Estimated Daily Operational Emissions – operational emissions would not exceed LSTs for NO_x, CO, PM₁₀, and PM_{2.5} emissions. Therefore, the proposed project’s operational impacts are considered less than significant.

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 air quality. 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 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. 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 has the ability to 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 dispose of such materials when found.

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	<i>Via Email (with Attachments) and U.S. Mail (without Attachments)</i>
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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

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

BC3

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.

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.)

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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

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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 accompli*, 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 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.

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 total³ 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

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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

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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. For the purpose 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. 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.

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.

Direct Disposal currently uses 3719 Noakes Street for overnight parking of company trucks, and in the morning those trucks are dispatched to job sites. Direct Disposal roll-off trucks travel between 3719 and 3720 Noakes Street throughout the day and processed and unprocessed CDI may be temporarily stored on the 3719 Noakes Street property in roll-off bins.

The Corrections and Modification Section revises Section 1.6, "Proposed Project" paragraph 4, to eliminate vehicle queuing and a future scale/scale house at 3719 Noakes Street. In addition, customer vehicle staging as well as the storage/processing of MSW will be prohibited at the 3719 Noakes Street site. See page CM-1 and revised Figure 2 on CM-2 (MND-4).

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 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).

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 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 (NO_x) 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 of the Final IS/MND. See page CM-5.

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 of the Final IS/MND. Notices were provided to all tenants and property owners within 500-feet of the property where the Large Volume Solid Waste Facility Permit is being requested. See page CM-6.

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. The addition of MSW transfer is 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 accompli*, which is opposite to CEQA's purposes.

Response BC 12 – The TPR is a draft document and has not been approved. 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 this Final IS/MND.

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 as well that the Knox Business Park Project referenced by the commentator generated 1,158 trips per day compared 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 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.

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 the wastes 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.

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. 19-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.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*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,

A handwritten signature in blue ink, appearing to read 'Miya Edmonson'.

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 A

Draft Initial Study/Mitigated Negative Declaration

**DRAFT INITIAL
STUDY/MITIGATED NEGATIVE
DECLARATION**

**DIRECT DISPOSAL LARGE
VOLUME SOLID WASTE
TRANSFER/PROCESSING
FACILITY**

Lead Agency:
City of Los Angeles Local Enforcement Agency
221 N. Figueroa Street, Rm. 1250
Los Angeles, CA 90012
(213) 252-3348

July 2019

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Appendix A - Mitigation Monitoring and Reporting Program

Appendix B – Draft Transfer/Processing Report

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

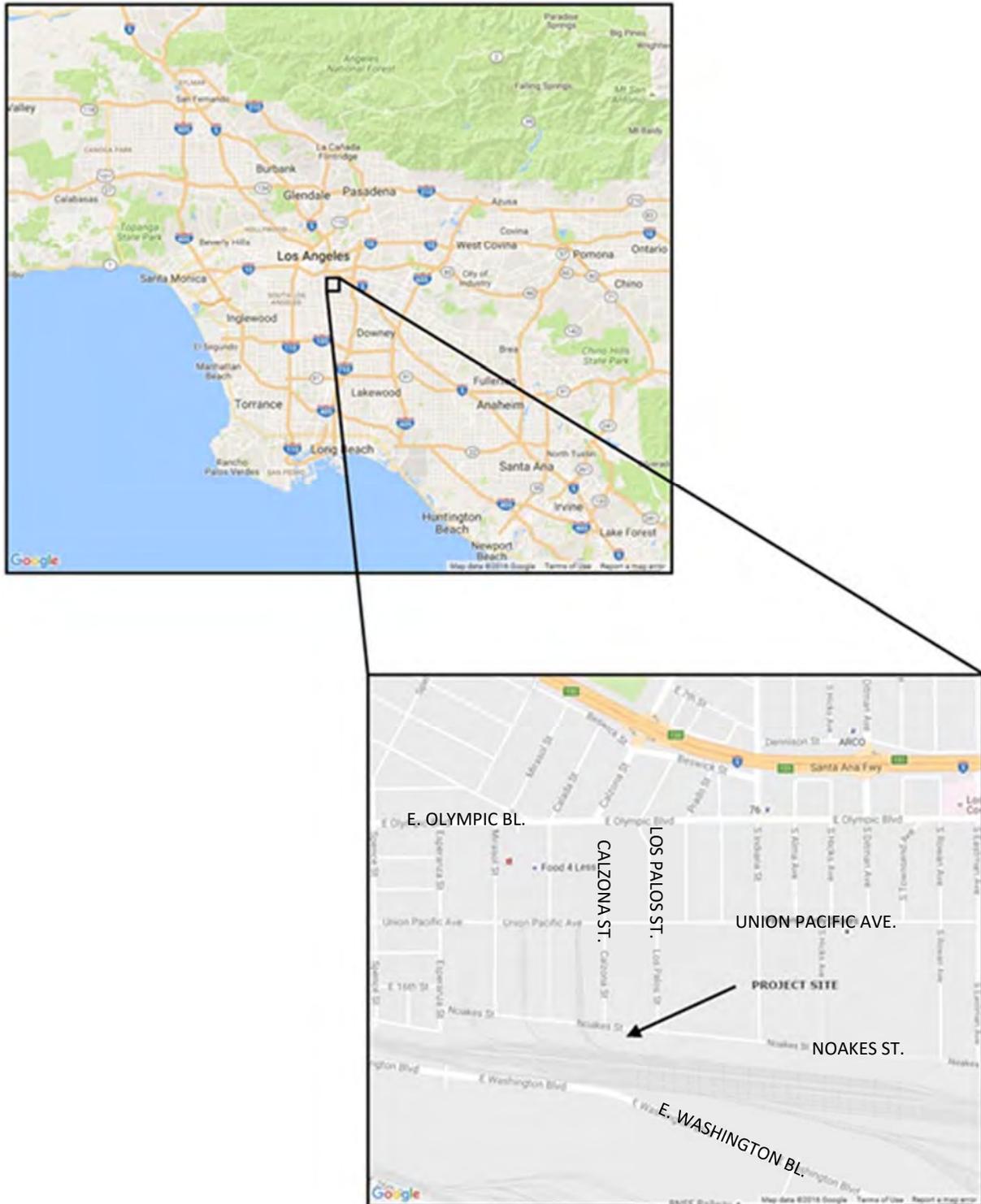
Direct Disposal, Inc.
3720 Noakes Street
Los Angeles, CA 90023
(323) 262-1604

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) 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. The proposed Large Volume SWFP will allow up to 500 TPD of solid waste to be processed and transferred at the Direct Disposal facility.¹

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.

The following Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) evaluates the environmental impacts associated with a new SWFP to operate a Large Volume Solid Waste Transfer/Processing Facility in the City of Los Angeles at 3720 Noakes Street. The 500 TPD permitted capacity will require adding employees/shifts and operating up to 24 hours per day, seven days per week (as currently permitted). 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 material, adding screens, increasing bunker capacities and extending the sort line. The anticipated improvements to the sort line will allow up to 50 tons per hour of material to be processed. 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 offices at the 3719 Noakes Street property which will free up additional space at 3720 Noakes Street for material storage and processing.

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).

FIGURE 2 - OVERALL SITE PLAN

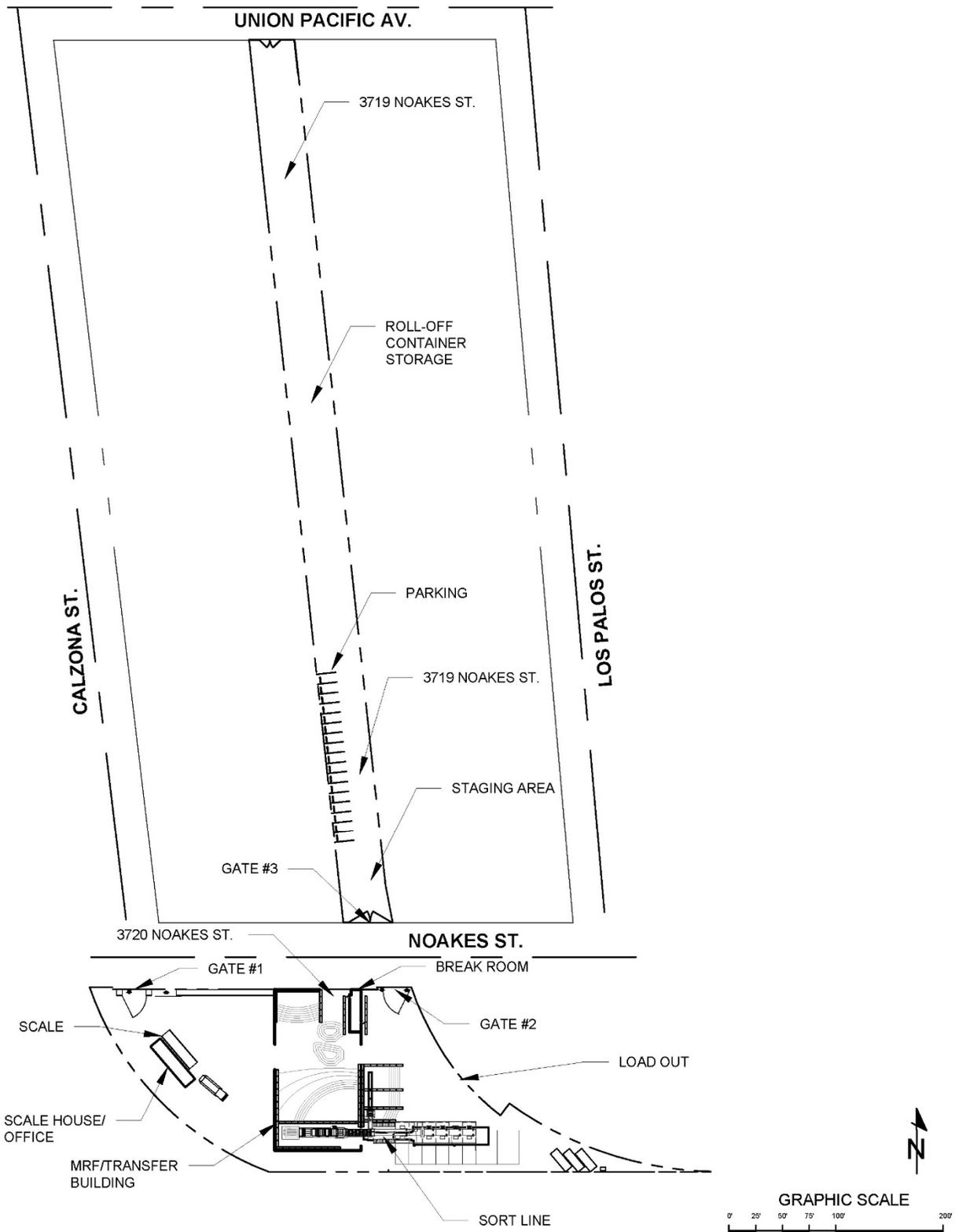
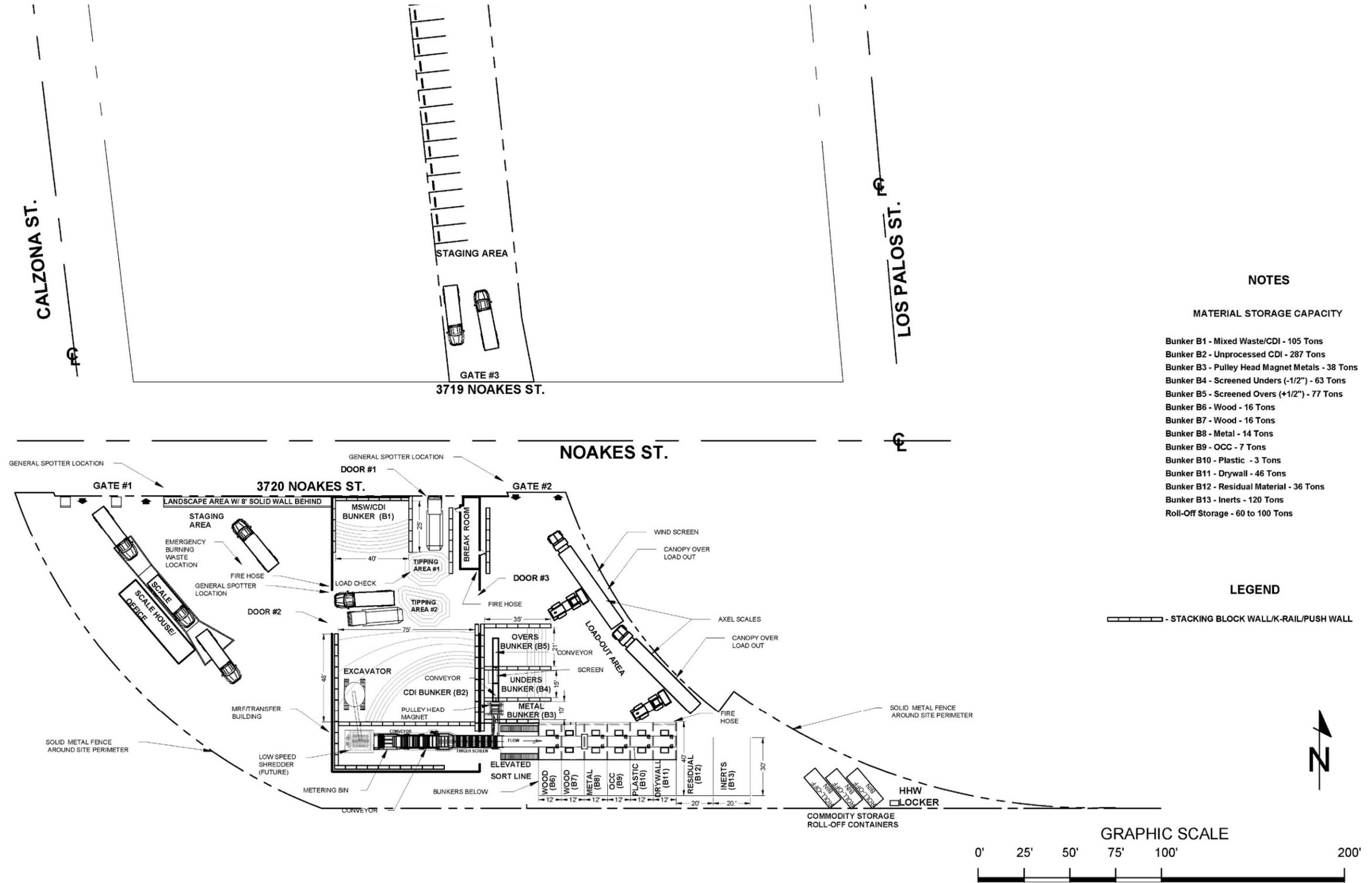


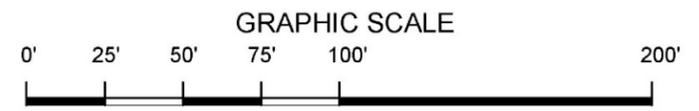
FIGURE 3 - SITE PLAN



- 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



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. Axle 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 B** of this initial study 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 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 Draft 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 Draft 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

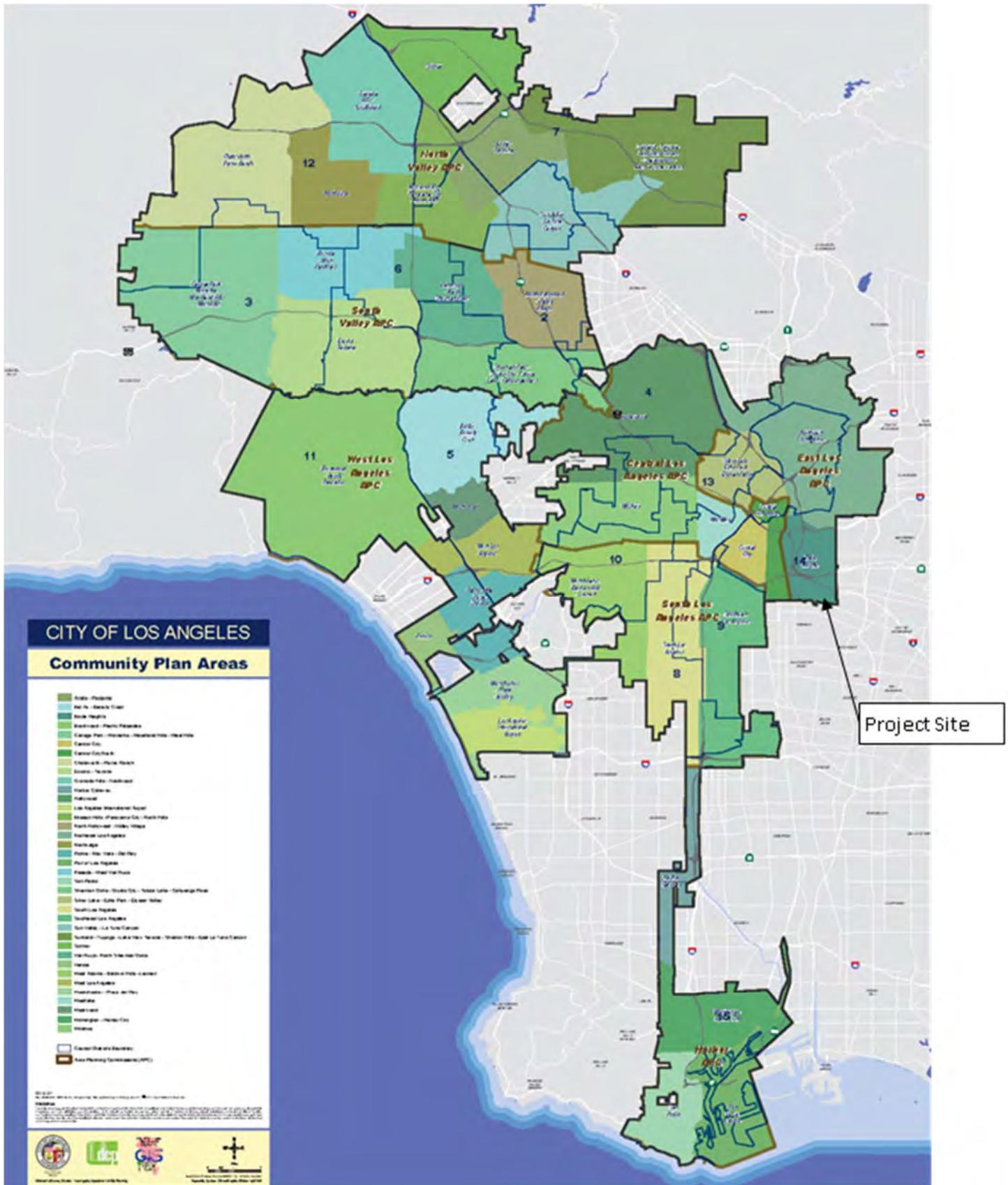
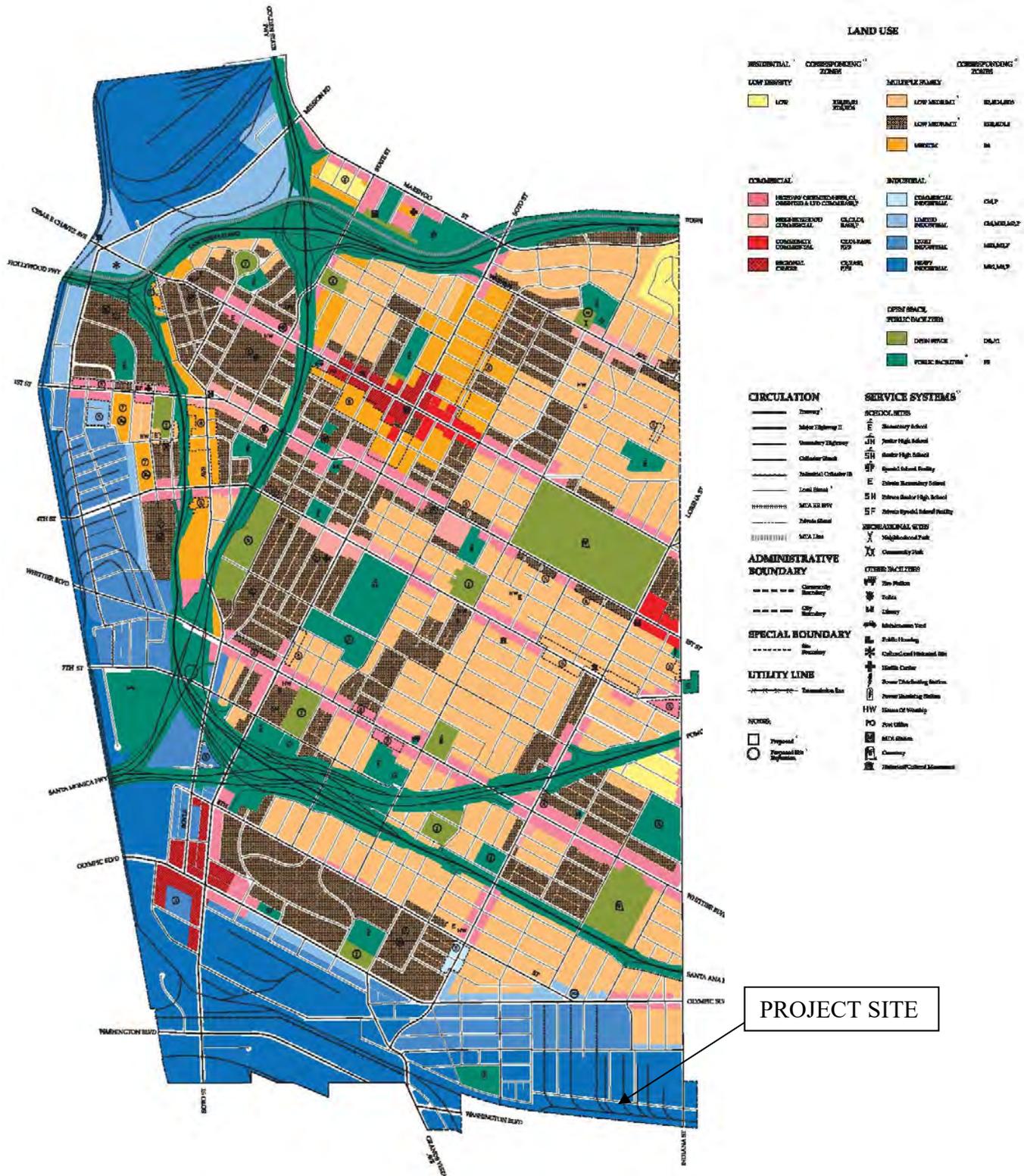


FIGURE 5 - BOYLE HEIGHTS COMMUNITY PLAN MAP



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) Section 12.21 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.

The project is in compliance with the requirements of the Clean Up Green Up (CUGU) overlay district based on the issuance of Use of Land Permits 16016-20000-24736, 16020-20001-03077 and 16020-20001-03078.

1.8 Background

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 processing and transfer 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 Draft 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.

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 Draft 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).

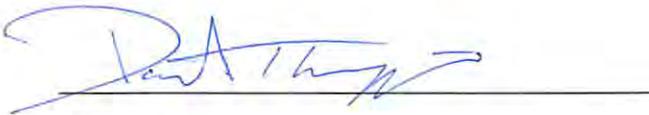
FINDINGS: The environmental analysis provided in the attached Draft IS/MND indicates that the proposed project will not result in any significant impacts. For this reason, the City of Los Angeles Local Enforcement Agency determined that a Draft IS/MND is the appropriate CEQA document for the proposed 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.



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

7/22/19

Date

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.

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

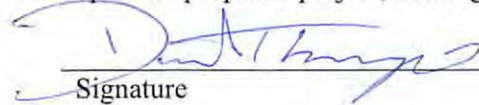
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

7/22/19
Date

David Thompson, REHS
Printed Name

SECTION 2. CEQA ENVIRONMENTAL CHECKLIST

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

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 litter 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.

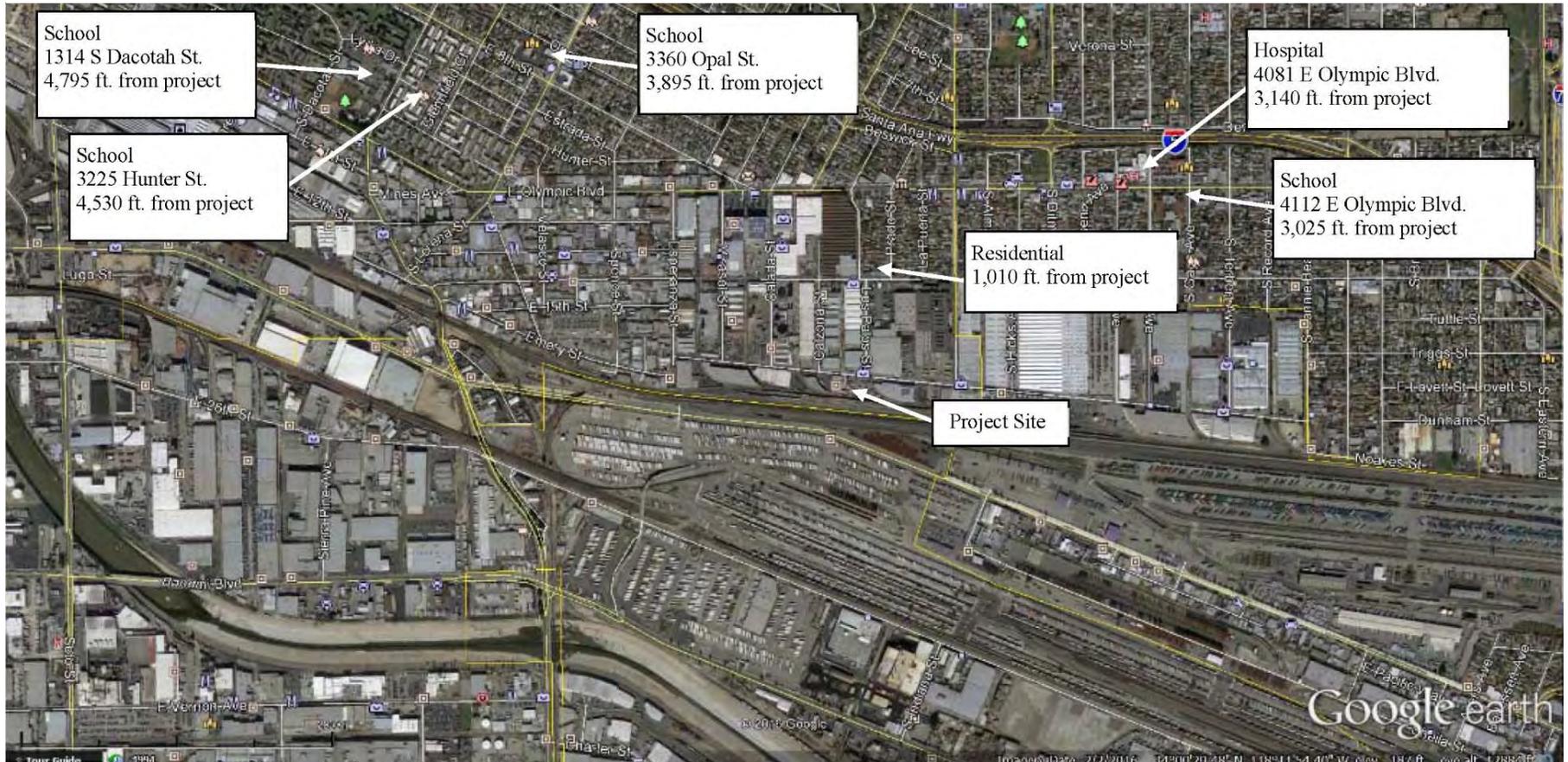
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the Air Basin is non-attainment (ozone, carbon monoxide, and PM10) under an applicable federal or state ambient air quality standard?				X
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The project will not increase any criteria pollutant.

d. Expose sensitive receptors to substantial pollutant concentrations?				X
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The site is over 1,000 feet from residences and the nearest sensitive receptors as shown in **Figure 7**.

FIGURE 7 - SENSITIVE RECEPTORS LOCATION MAP



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

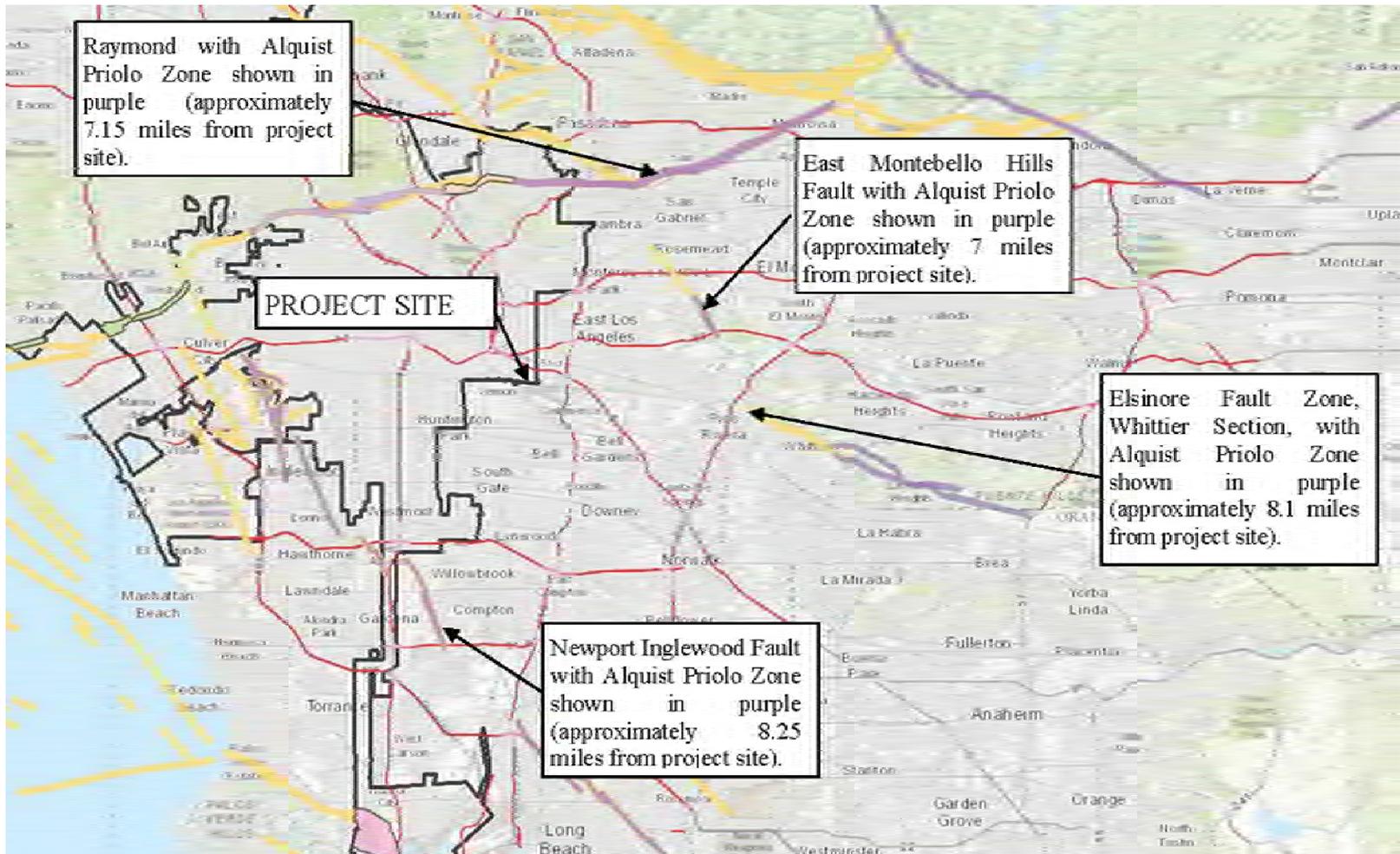
b. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?			X	
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The subject site is within approximately 10 miles from the Newport-Inglewood Fault 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
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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
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d. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				X
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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
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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
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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
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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
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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
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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		
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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
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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	
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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
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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
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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
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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
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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
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g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
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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
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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		
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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
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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
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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
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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
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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
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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
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f. Otherwise substantially degrade water quality?		X		
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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
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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
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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
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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
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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 (e) 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 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.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
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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
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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
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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		
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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.

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.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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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
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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 area to excessive noise levels?				X
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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
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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	
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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.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
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No housing will be displaced, as a result of the facility changes.

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

c. Schools?				X
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The facility’s increase in tonnage is an industrial use of the land and will not increase demand on schools.

d. Parks?				X
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The facility’s increase in tonnage is an industrial use of the land and will not increase demand on parks and recreation facilities.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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e. Other public facilities?				X
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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
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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
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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	
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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.

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

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

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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3.16 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

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
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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
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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
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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
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The City of Los Angeles serves the facility’s need and demand for waste water treatment.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
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The proposed project would increase the maximum daily tonnage from 175 TPD to 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	
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The facility will comply with federal, state, and local statutes and regulations related to solid waste with the implementation of the referenced mitigation measure.

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
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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 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.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			X	
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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.

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%

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

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	
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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	
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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.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?			X	
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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.

Direct Disposal Large Volume Transfer/Processing Facility Mitigation Monitoring and Reporting Program

Category	Mitigation No	TABLE A-1 Mitigation Measure	Initial Study Section
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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 litter 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

Direct Disposal Large Volume Transfer/Processing Facility Mitigation Monitoring and Reporting Program

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 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

Direct Disposal Large Volume Transfer/Processing Facility Mitigation Monitoring and Reporting Program

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

Direct Disposal Large Volume Transfer/Processing Facility Mitigation Monitoring and Reporting Program

Category	Mitigation No	TABLE A-1 Mitigation Measure	Initial Study Section
	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 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 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 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 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 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 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 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 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 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 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

Direct Disposal Transfer/Processing Facility Mitigation Monitoring and Reporting Program

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 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

Direct Disposal Transfer/Processing Facility Mitigation Monitoring and Reporting Program

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
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

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
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 litter control plan as contained in the Transfer/Processing Report; and 5) Regular cleaning of all areas.	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
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 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 creation of noise beyond certain levels at adjacent uses unless technically infeasible.	The facility manager and employees shall be responsible for insuring 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
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 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, in compliance 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 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 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 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 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 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 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 Draft IS/MND.	Direct Disposal	Prior to the processing the increased amount of material proposed under this Draft 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

DRAFT TPR

DIRECT DISPOSAL MATERIAL RECOVERY FACILITY AND TRANSFER STATION

TRANSFER/PROCESSING REPORT

Prepared for:

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3720 Noakes St.
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July 2019

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

Applicant's Name (Print)

Applicant's Signature

Date

Dan Agajanian

Owner's Name (Print)

Owner's Signature

Date

TRANSFER/PROCESSING REPORT

Direct Disposal MRF and Transfer Station

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TRANSFER/PROCESSING REPORT

Direct Disposal MRF and Transfer Station

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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 and 3719 Noakes Street, in the City of Los Angeles. This TPR has also been prepared in accordance with Title 14, Section 18221 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 process 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.

The Direct Disposal facility includes 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 queuing, parking and storage of containers.

The purpose of this TPR and Solid Waste Facility Permit (SWFP) amendment 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. 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 – CDI Processing (1,000 TPD Solid Waste Transfer)
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 with the exception of one property that is zoned MR1-1.

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.

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 container storage, employee parking, and staging vehicles. **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

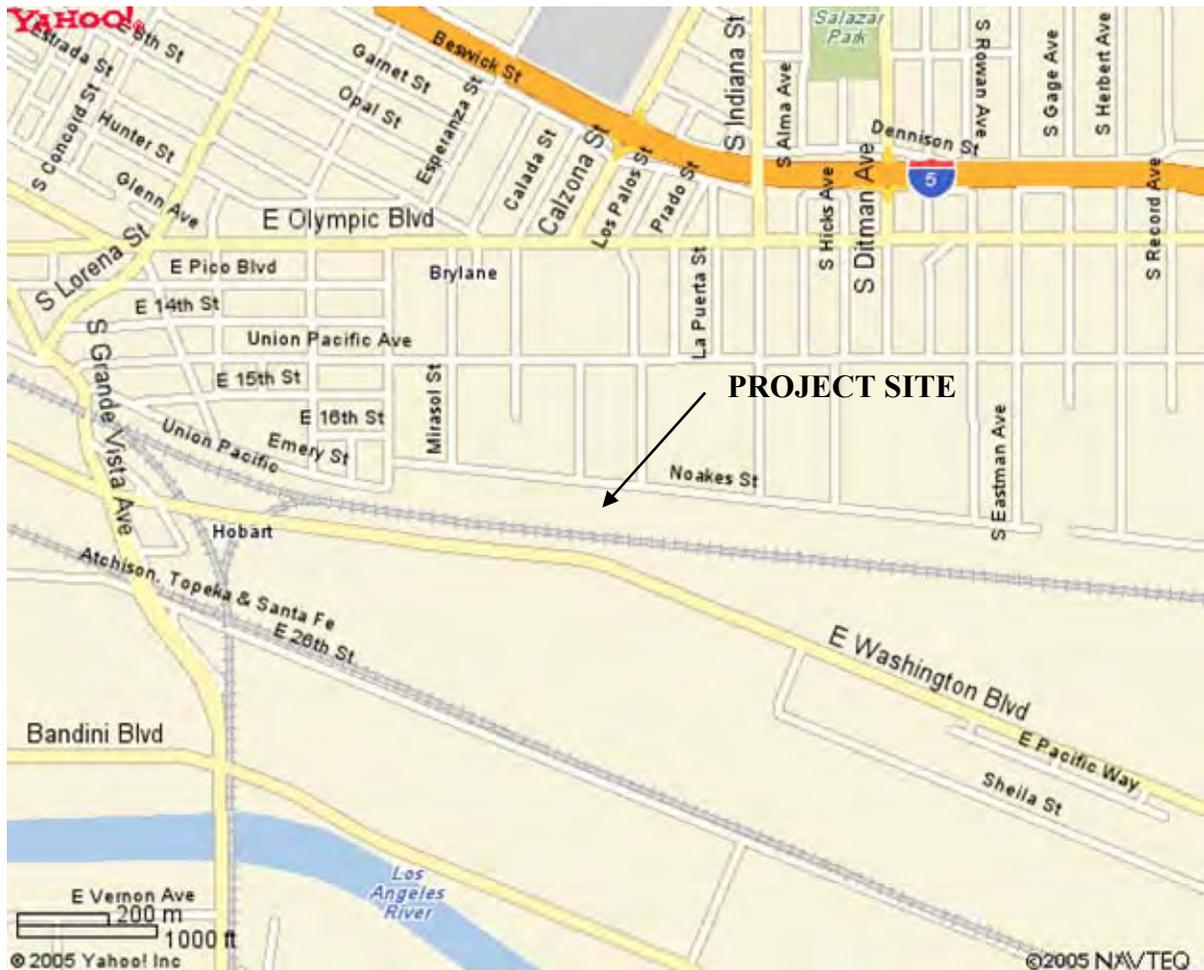
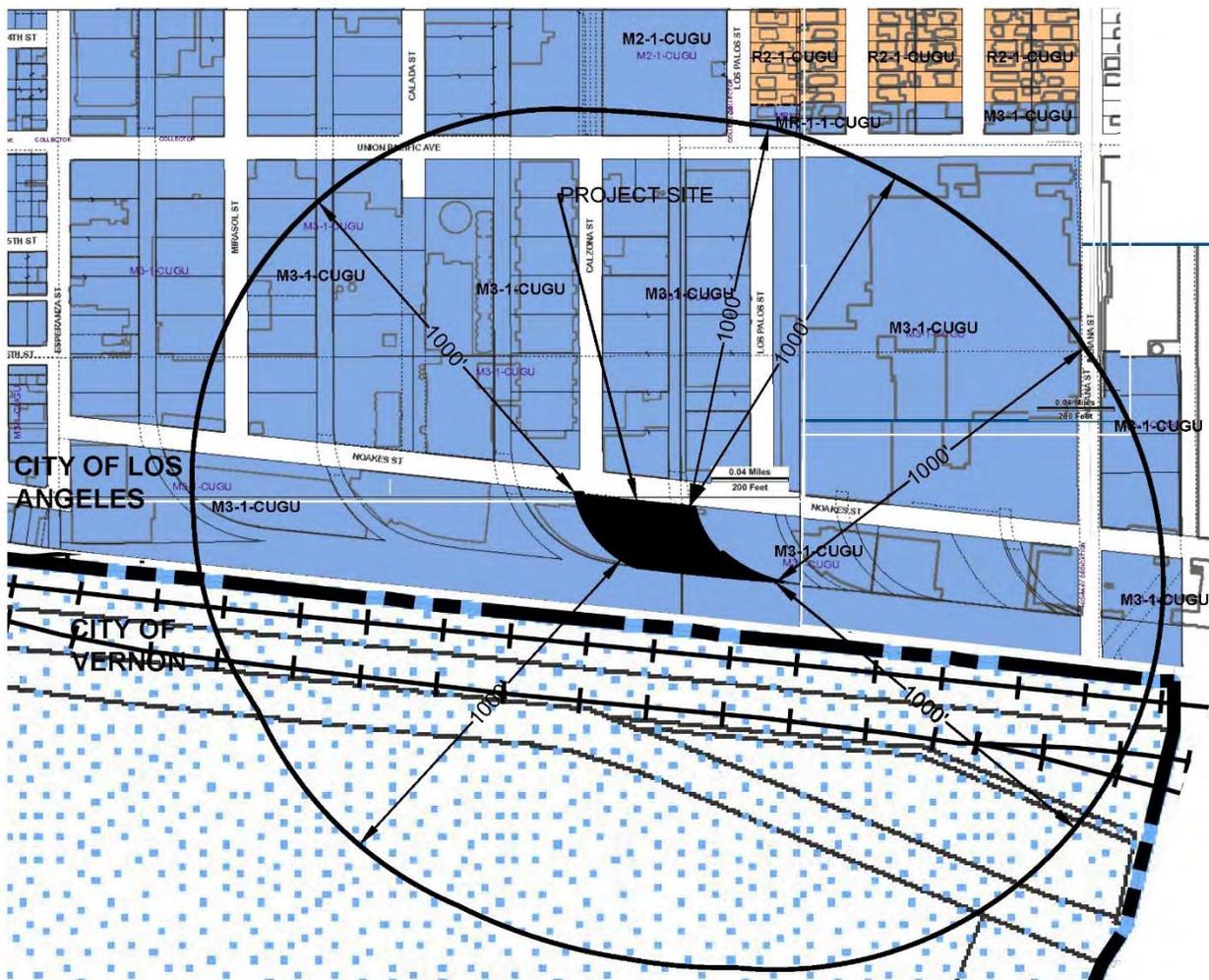
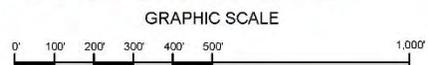


FIGURE 2 - 1,000 FOOT RADIUS MAP



CITY OF LOS ANGELES ZONING LEGEND

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- P, PB
- PF
- HILLSIDE



CITY OF VERNON ZONING LEGEND

- | Zone | Overlay Zones | Base Map |
|------------|----------------------------|----------------------------|
| Industrial | Housing | Vernon City Boundary |
| | Emergency Shelter | Vernon Sphere of Influence |
| | Commercial-1 | Freeway |
| | Commercial-2 | Railroad |
| | Rendering | |
| | Slaughtering | |
| | Truck and Freight Terminal | |



TRANSFER/PROCESSING REPORT

Direct Disposal MRF and Transfer Station

FIGURE 3 - OVERALL SITE PLAN

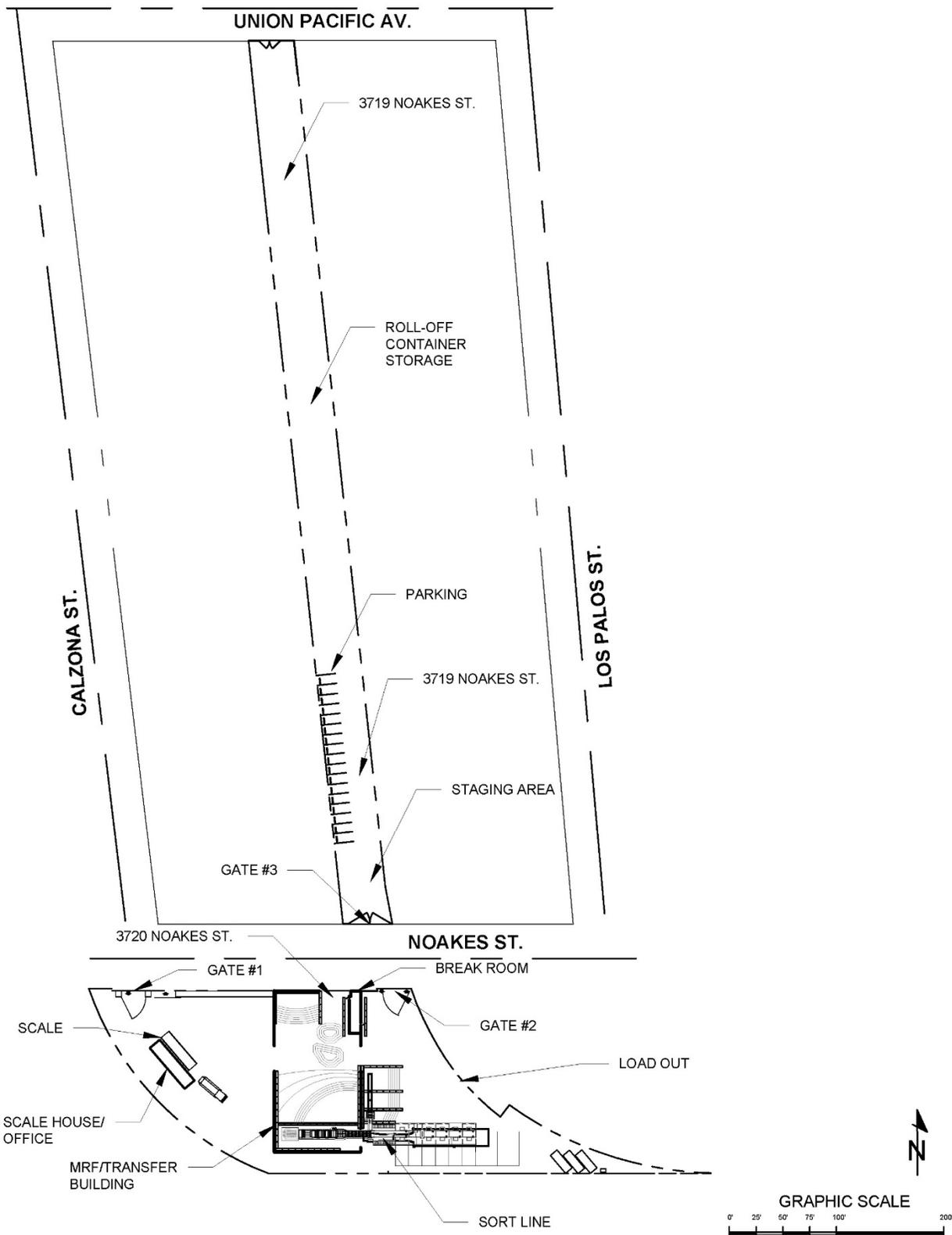
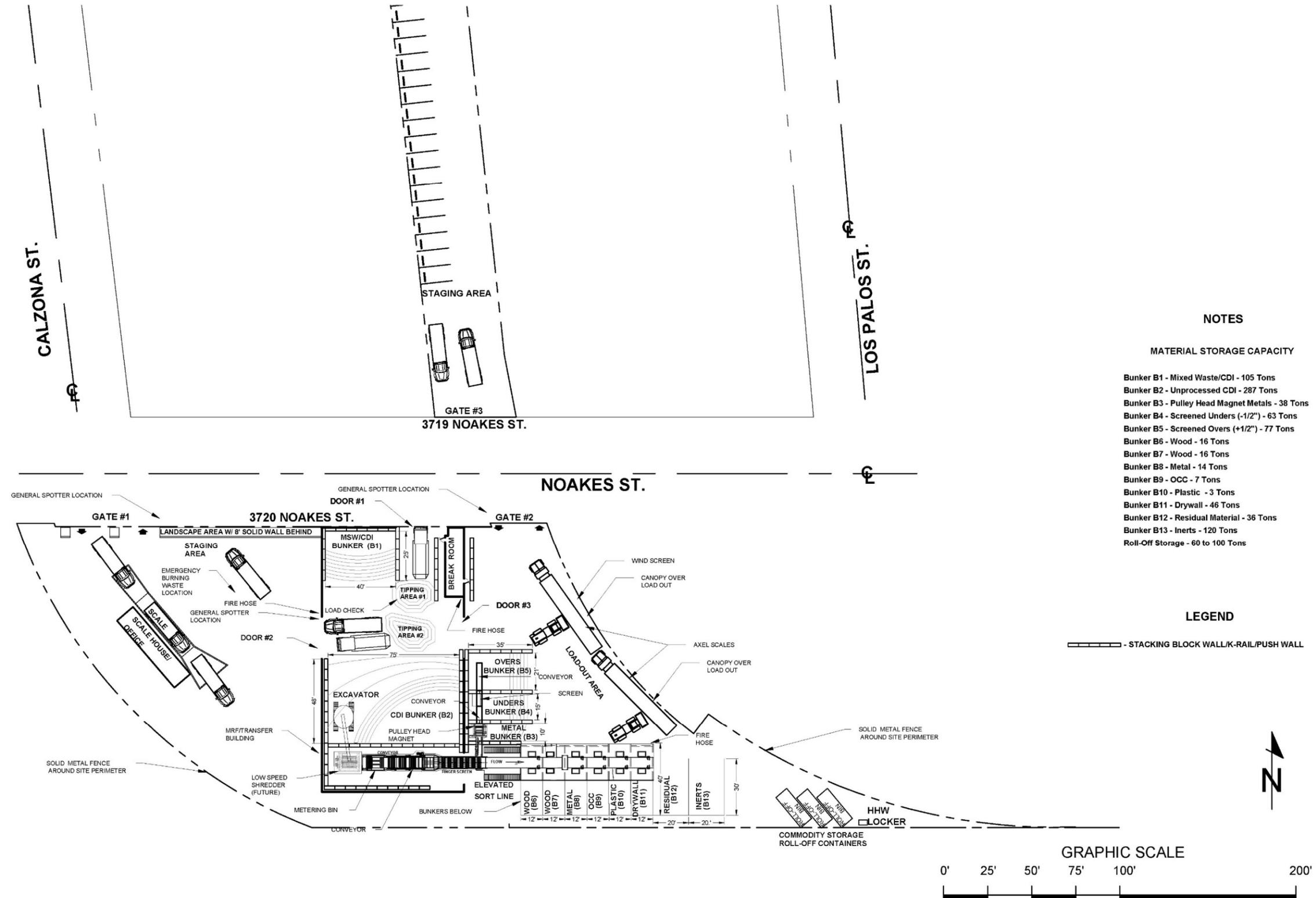


FIGURE 4 - SITE PLAN



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Direct Disposal MRF and Transfer Station

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

TRANSFER/PROCESSING REPORT

Direct Disposal MRF and Transfer Station

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 past experience designing and permitting with other similar facilities.

**TABLE 2
FACILITY TRAFFIC**

VEHICLE TYPE	VEHICLES PER DAY (@500 TPD)⁽¹⁾
<u>Inbound Vehicles</u>	
Commercial Vehicles	88
Self-Haul	60
<u>Outbound Vehicles</u>	
Transfer Trucks/End Dumps	22
Employee Vehicles ⁽²⁾	54
TOTAL VEHICLES PER DAY	224

⁽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 June 7, 2019, 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 June 7, 2019.
- **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.
- **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 CalRecycle 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 & scales
- 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.

The majority of 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.

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.

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.

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Direct Disposal MRF and Transfer Station

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 and may stage at 3719 Noakes Street when both load-out spaces are being used. 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.

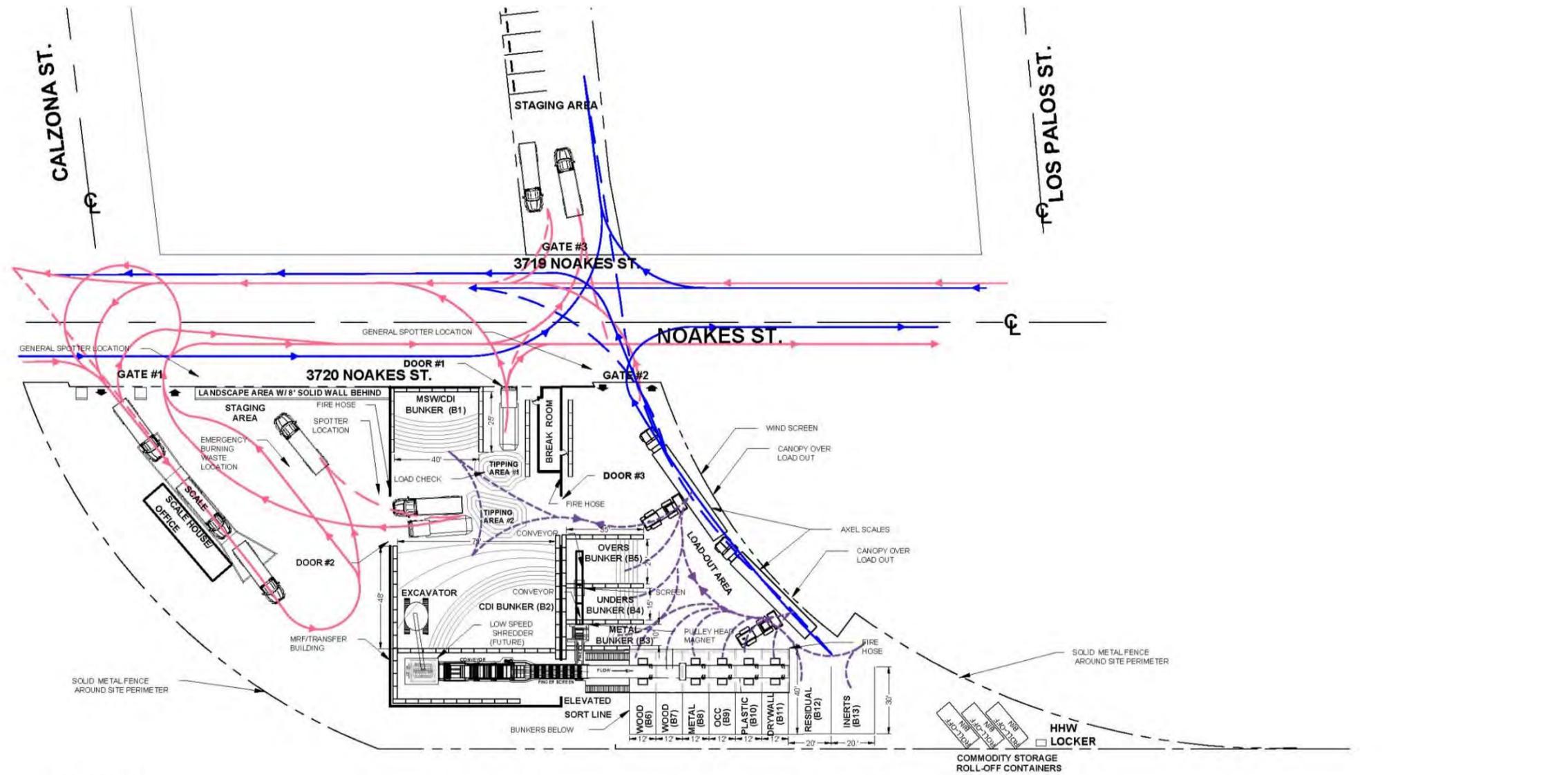
Employees park on the west side of the main building and on company-owned property at 3719 Noakes Street. All traffic within the facility is organized in such a manner to reduce the possibility of accidents. Outgoing material transfers are organized during non-peak hours. In case of delays in the tipping area, trucks are able to queue on and to the north of the truck scale, along Noakes Street or at 3719 Noakes Street without obstructing on of off-site traffic.

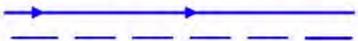
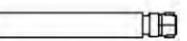
All first-time incoming trucks weigh the truck and container separately to get their TARE weights. All TARE weights are stored in the Direct Disposal computer system for future use. In case of equipment breakdown, or when the tipping areas gets filled up, the facility will not accept any additional material 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



VEHICLE TYPE		VEHICLE PATH AND DIRECTION OF TRAVEL (DASHED LINES INDICATE A VEHICLE BACKING UP)	
	SELF HAUL		
	ROLL-OFF TRUCK		
	COLLECTION TRUCK		
	LOADER		
	TRANSFER TRUCK		
			STACKING BLOCKS/K-RAIL/PUSH WALL -

GRAPHIC SCALE

0' 25' 50' 75' 100' 200'



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. If and 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 prior 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.

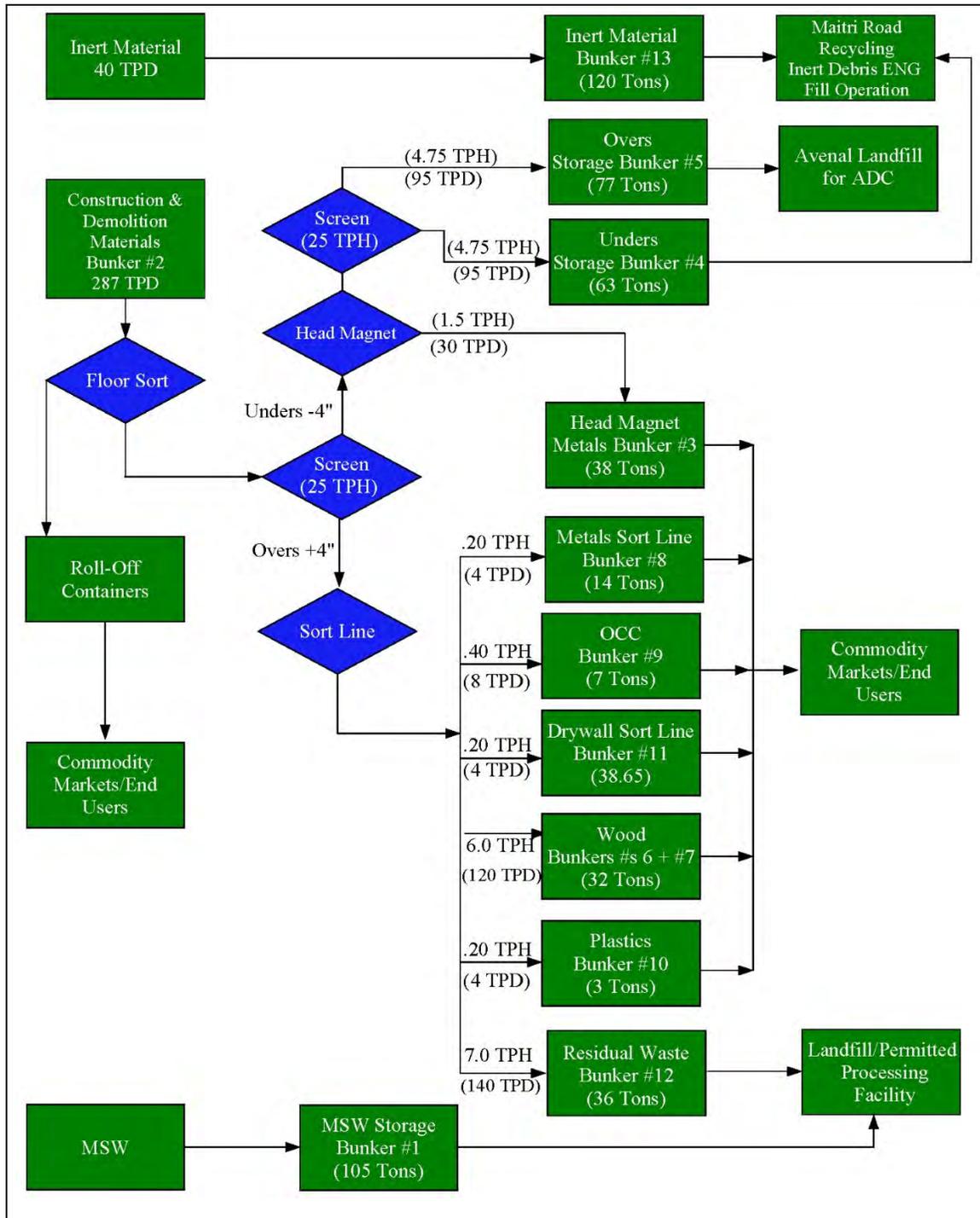
3.1.5 Parking Areas

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 sorting, processing, 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



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Direct Disposal MRF and Transfer Station

3.1.7 Surface Drainage and Runoff Control Plan

The drainage and runoff control plan has been submitted 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 the Facility Plan; 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. The majority of water used as dust control in the tipping area is absorbed into the pile or evaporates.

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 taken into account in calculating the facilities throughput and capacity. As the facility increases its throughput and adds new waste streams 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

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Direct Disposal MRF and Transfer Station

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.

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Direct Disposal MRF and Transfer Station

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, Nitril 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

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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 in several places around the site. The site will be maintained in a manner that allows fire department access to all areas in the event of an emergency.

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Direct Disposal MRF and Transfer Station

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) on a daily basis 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 still continue. If power is lost for an extended period of time, 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 at 3719 Noakes Street. 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 on a daily basis. 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**.

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**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/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.

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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.

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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:

$$\text{Capacity} = (\text{Pt} \times \text{N} \times 60 \times \text{Ht}) / (\text{Tt} + \text{B})^1$$

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 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.

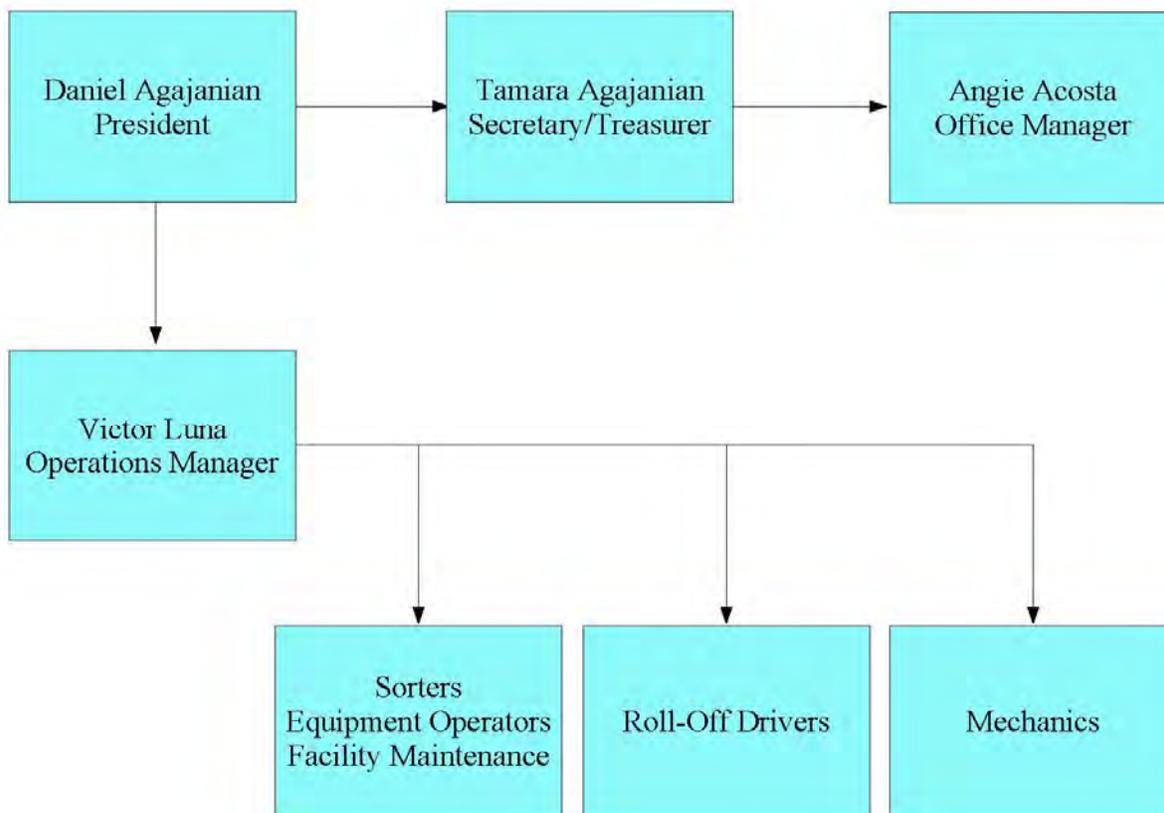
Table 6 lists the facility positions and number of personnel anticipated at the facility at the 500 TPD operation. The number and assignments may change to some extent depending on operational requirements. The operation is typically conducted over 1 shift, but could be extended to a second shift, if 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



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**TABLE 6
FACILITY STAFFING**

Position	Employees (At 500 TPD)
<i>Facility Management</i>	
Manager	1
<i>Operations</i>	
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
<i>Maintenance</i>	
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

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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 be in need of 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

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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 least, 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; and,
- 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 taking 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. In the event that 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 in 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 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.

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.

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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

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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.

Loads with significant organics, such as foodwaste, will be transferred offsite within 24 hours.

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6.23 SUPERVISION AND PERSONNEL

The operator provides adequate supervision and a sufficient number of qualified personnel to ensure proper operation of the site 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; be adequate for overall planning and control purposes; and, 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,

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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**.

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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 through the use of fencing and walls.

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
- 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-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 sewer service is 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

Direct Disposal MRF and Transfer Station

Material storage capacity calculations for each pile and bunker assume 1:1 side slopes and are based on the following formula:

$$Volume = (Base Area + Top Area + \sqrt{(Base Area \times Top Area)}) \times Height / 3$$

“Volume-to-Weight Conversion Factors” published by the U.S. Environmental Protection Agency Office of Resource Conservation 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_memo_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 be 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.

MATERIAL STORAGE CAPACITY CALCULATIONS

Direct Disposal MRF and Transfer Station

DIRECT DISPOSAL CAPACITY CALCULATIONS - VERSION 3 CDI WITH 100 TPD MSW

$$Volume = (Base Area + Top Area + \sqrt{(Base Area \times Top Area)}) \times Height / 3$$

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

MATERIAL STORAGE CAPACITY CALCULATIONS

Direct Disposal MRF and Transfer Station

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		

MATERIAL STORAGE CAPACITY CALCULATIONS

Direct Disposal MRF and Transfer Station

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 one of two regrouping areas
 1. Regrouping Area A – located in the parking lot in front of the office.
 2. Regrouping Area B - located in the just east of the outgoing scales.
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 not 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 or 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

___ Earthquake

___ Personal injury

___ Unknown hazardous waste

___ Fire

___ Other_____

Description of incident_____

• Time_____

• Location_____

• Date_____

• 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 is 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.

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 2019

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#: [REDACTED]

Location: 3720 Noakes Street, Los Angeles, CA, 90023

Permit: Large Volume Solid Waste Facility Permit

Operation: Green material, Construction & Demolition debris (C&D), C&D Inert debris (CDI), and mixed Municipal Solid Waste (MSW), greenwaste and organic material received, hand sorted, processed over a sort line, temporarily stored, and then delivered to other processing facilities or landfill.

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, greenwaste material and organic material processing and transfer station. 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, greenwaste

and organic material will not be processed, beyond sorting and removal of recyclable material off the tipping floor. 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 three bunkers depending on the type of material. One bunker is for receiving greenwaste, one is for mixed MSW and the third 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 areas for mixed MSW, greenwaste and C&D are located in three sided bunkers. The walls act as a wind barrier, minimizing odor travel.

To further minimize dust, an overhead misting system is located over the tipping and load out areas. Hand held deodorizer spray is used by personnel to control odor.

The sprinkler system moistens loads when tipped to reduce the amount of dust created. The deodorizer spray destroys odor from any material deposited on the tipping floor.

Protocol for Handling Odiferous Loads

All incoming loads are checked for offensive 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.”

Name (print)

Signature

Date

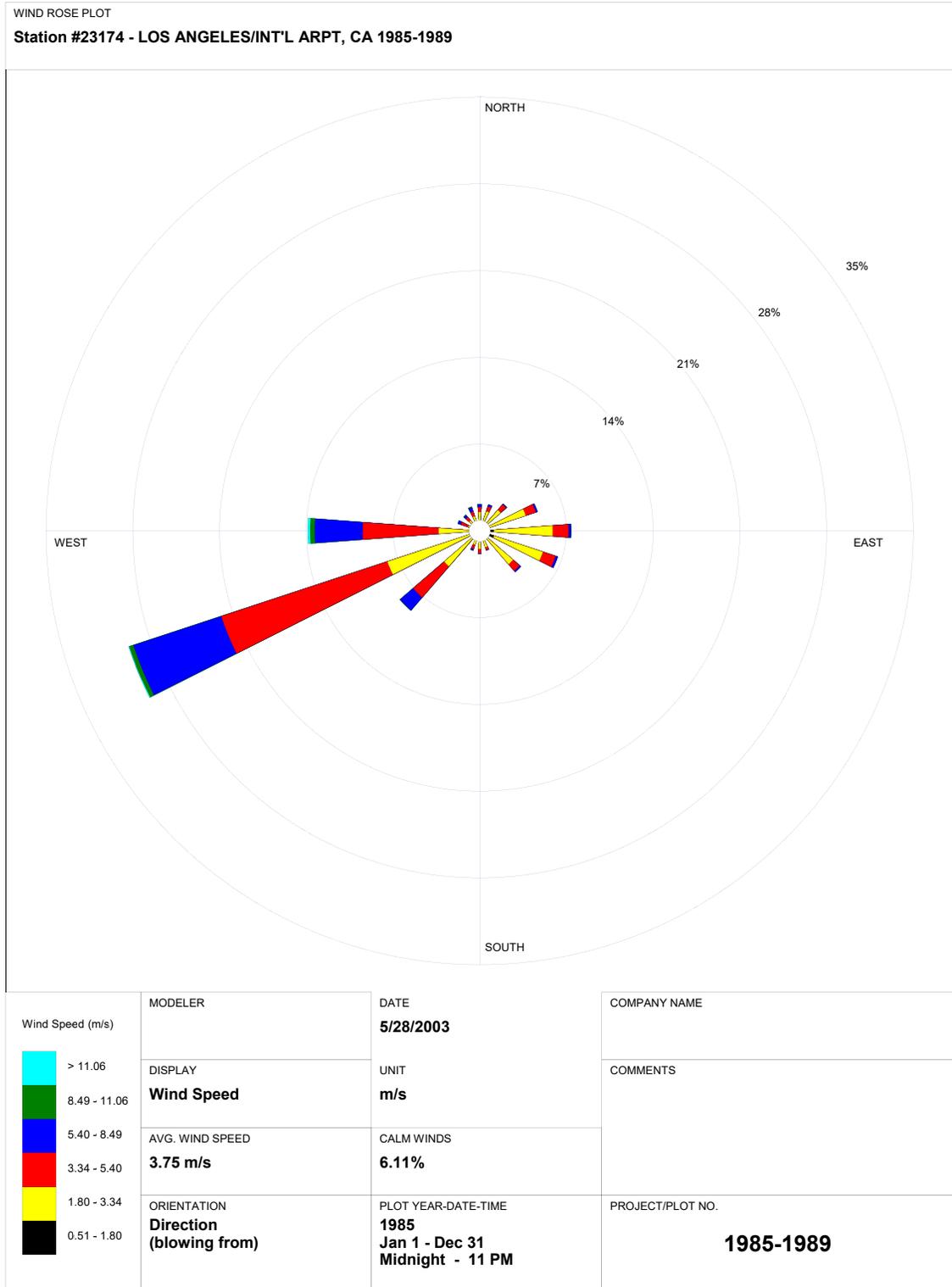
Attachment A

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



APPENDIX F

SAFETY COMPLIANCE REPORT

- 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. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Only used for intended purpose. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. Damaged tools repaired or replaced promptly. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Stairs:

- | | | | | |
|-----------------------|--------------------------|--------------------------|--|-------|
| A. Lighting adequate. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Non-slip surface. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. Handrails secure. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Ladders:

- | | | | | |
|---|--------------------------|--------------------------|--|-------|
| A. Proper type for intended use. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Maintained in good condition. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. Proper ladders used instead of chairs, boxes, etc. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

First Aid:

- | | | | | |
|--|--------------------------|--------------------------|--|-------|
| A. Fully stocked First Aid kit. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Emergency telephone numbers posted. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. At least one person trained in First Aid. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Emergency Action Plan:

- | | | | | |
|--|--------------------------|--------------------------|--|-------|
| A. Written; covers fire and other emergencies. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Communicated to all employees. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. Employees designated and trained to implement plan. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Fire Protection:

- | | | | | |
|--|--------------------------|--------------------------|--|-------|
| A. Firefighting equipment is serviced and accessible. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Employees instructed in use of firefighting equip. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. Employees instructed in fire protection procedures. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Egress:

- | | | | | |
|--------------------------|--------------------------|--------------------------|--|-------|
| A. Exits clearly marked. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Exits accessible. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. Exit doors unlocked. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Electrical:

- | | | | | |
|---|--------------------------|--------------------------|--|-------|
| A. All equipment either grounded or double insulated. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Extension cords in good repair. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. At least 36" clearance around control panels. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Personal Protective Equipment:

- | | | | | |
|--|--------------------------|--------------------------|--|-------|
| A. Proper equipment in use where needed. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| B. Properly maintained and stored. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
| C. Employees trained in proper usage. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |

Health Hazards:

- | | | | | |
|---|--------------------------|--------------------------|--|-------|
| A. Hazard communication program in place. | <input type="checkbox"/> | <input type="checkbox"/> | | _____ |
|---|--------------------------|--------------------------|--|-------|

APPENDIX G

**INJURY AND ILLNESS PREVENTION
PROGRAM**

INJURY AND ILLNESS PREVENTION PLAN

NOVEMBER 2007

Direct Disposal MANAGEMENT POLICY STATEMENT

To All Employees:

As Chief Executive Officer, I accept responsibility for overall safety and health in our operations. Florence Sanchez 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 1, 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?

1) 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.

2) 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 insure 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
Victor Luna
Direct Disposal

Safety Coordinator
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;
- 3) Consistently and fairly enforce all company safety rules
- 4) Investigate injuries to determine cause, then act to prevent repetition;

4

- 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;
- 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

Direct Disposal 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;

- 1) 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:

- 1) 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:

- 1) 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.

Intentionally Left Blank

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 _____ safety date _____
sheets and how to read MSDS.
- 11. Reviewed evacuation procedures and any specific duties _____
- 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.

Direct Disposal

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 Explain

-Is Dust Control Adequate?
Yes No Explain

-Are Hand Tools Properly Maintained and in Good Condition?
Yes No Explain _____

-Are Storage Racks in Good Condition and Earthquake Safe?
Yes, No Explain _____

-Are Employees Aware of Safety Rules and Procedures?
Yes No Explain _____

-Is the Non-Smoking Policy Being Enforced?
Yes, No 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 Explain _____

-Other Comments _____

General Comments and Recommendations _____

Direct Disposal

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

COMPANY: _____ DATE: _____ COMMITTEE MEMBERS PRESENT: _____

COMMITTEE _____
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: _____

Committee Chairperson

Direct Disposal

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	Unsafe loading, placing, mixing, combining, etc.
Operating or working at unsafe speed	Taking unsafe position or posture
Making safety devices inoperative	Working on moving or dangerous equipment
Using unsafe equip. hands instead of equip, or equip. unsafely	Lack of job training or instruction
Failure to use safe attire or personal protective equipment	Lack of job training or instruction
Improper: turn lane usage backing interval interval signal judgment Other:	

UNSAFE CONDITIONS

___ Improper guarding (unguarded, inadequately guarded, guard removal, etc.)	___ Improper illumination (none, glaring light, etc.)
___ Defective substances or equipment (broken, poor design, slippery, etc.)	___ Improper ventilation (poor, dusty, gassy, high Hazardous
___ arrangement (unsafely piled material, poor layout, poor lighting)	humidity, etc.)
___ Housekeeping. (No aisle markings, etc.)	___ Poor road or visibility condition
___ Improper dress or apparel (goggles, gloves, shoes, masks, sleeves, etc.)	
Defective: brakes motor steering tires wheels or rims Other:	

STEPS TAKEN TO PREVENT A RECURRENCE Unsafe

Act:

Instructed employee	Supplied safeguard	Eliminated condition	Reported condition to:
Warned employee	Supplied personal equipment	Repaired condition	
Other action		Guarded machine	
		Other action	_____

SUPERVISOR'S SIGNATURE

DATE

Supervisor's Accident

Plant or Job	Name of injured or driver
--------------	---------------------------

Invest action Report

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

The types of extinguisher used here are:

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 hotel guests 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.
- _ Ensure that the fire department is notified (even if the fire was put out) by calling Hotel Operator, dial 0 (in that way the room number will appear on the switchboard). The Hotel Operator will advise the fire Department of the hotel name, hotel address, advise that it is a hotel, type of fire, if known (chemical, electrical, paper) and if there are any known injuries. Also advise as to where our guests will be regrouping. Let them know if someone is trying to extinguish the fire (i.e., maintenance man is trying to extinguish a mattress 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 01 the will be directed to the regrouping area (SEE PAGE 23). Guests 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.

■ 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.

Direct Disposal 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:

- 1) 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

Direct Disposal 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 OF 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 or 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.

Direct Disposal

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_____

Direct Disposal

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.

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)

Sound 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

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.

EARTHQUAKE

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:

- 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:

- 1) 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:
- 1) 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 (1) member shall be in a position of authority, which shall act as the chairperson. Employees selected shall be from various working levels and should be 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.
Written records of such discussion and approved recommendations shall be kept in the form of minutes;
- 4) Study the causes of accidents occurring since the last meeting for the purpose of devising methods to prevent recurrence; and
- 5) 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)

1) A General Safety Committee of not less than three (3) persons, nor less than (1) 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.
- 2) A Workers' Safety committee shall consist of not less than three (3) workers, or less than one (1) 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
- 3) 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)

1)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.

2) 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.

3) 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.

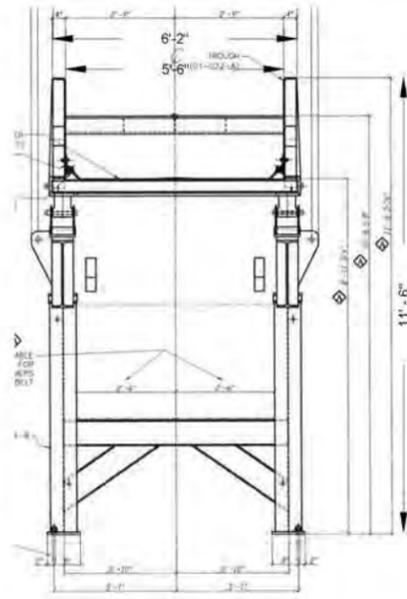
4) Supervisory employees may serve on the Workers' committee where there are only casual or seasonal employees.

Inspection service (all classes):

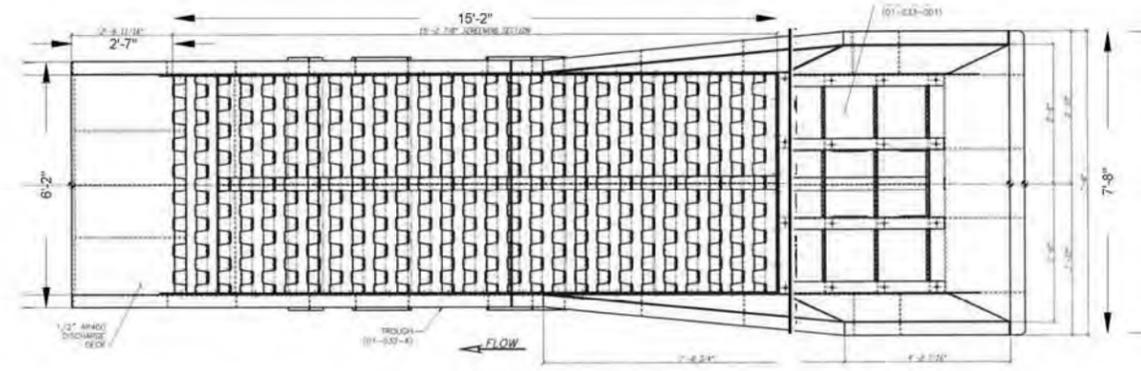
The Safety Inspector shall be in charge of inspection service and shall make regular monthly inspections of the location. He shall fill out and sign acceptable report forms.

APPENDIX H

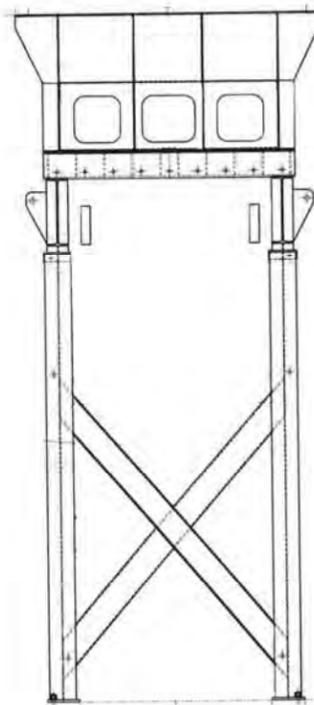
PROCESSING EQUIPMENT DIAGRAMS



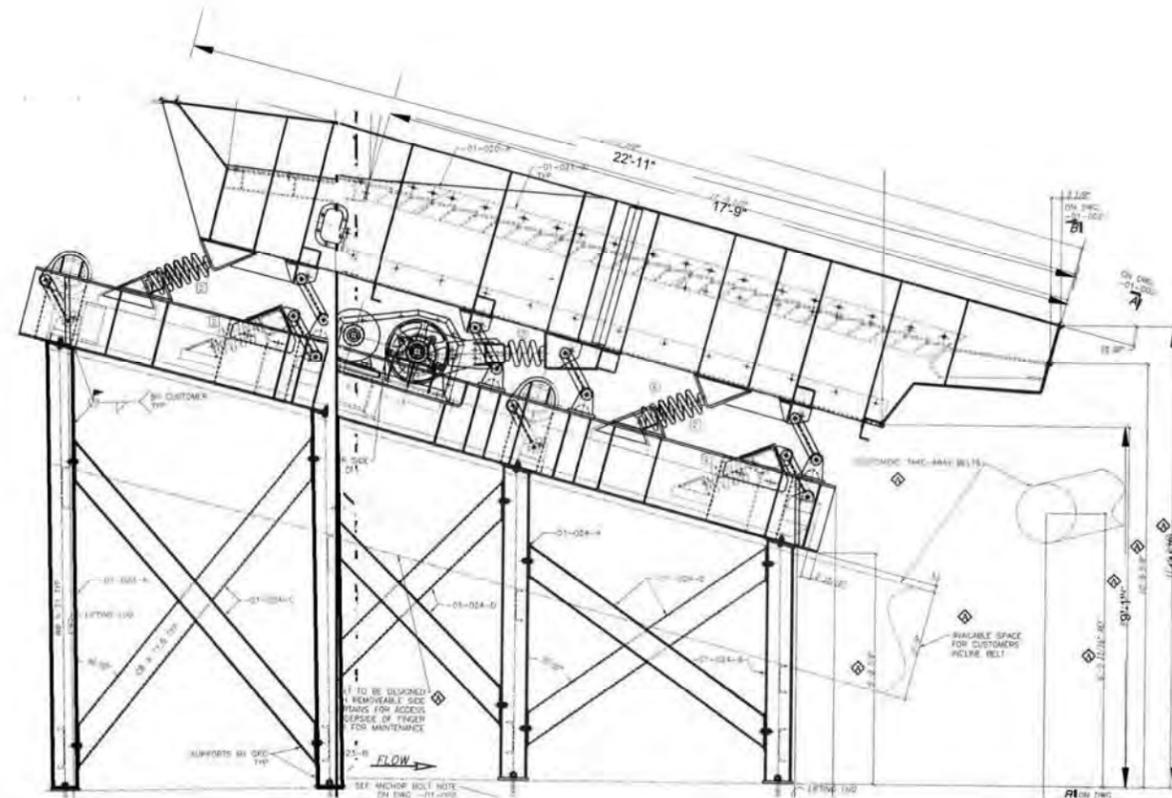
VIEW "B-B"



VIEW "A-A"



END VIEW

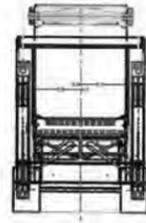


SIDE VIEW

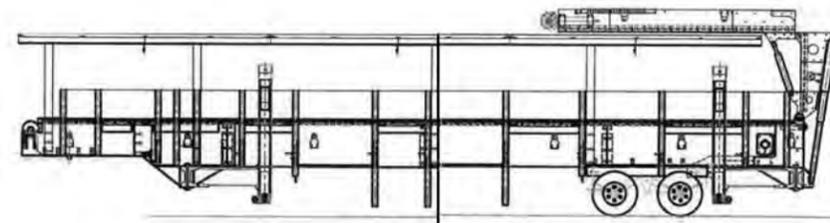
GRAPHIC SCALE

GENERAL KINEMATICS FINGER SCREEN

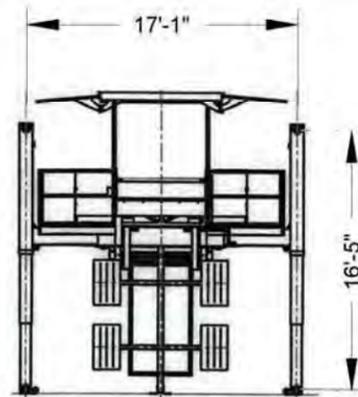
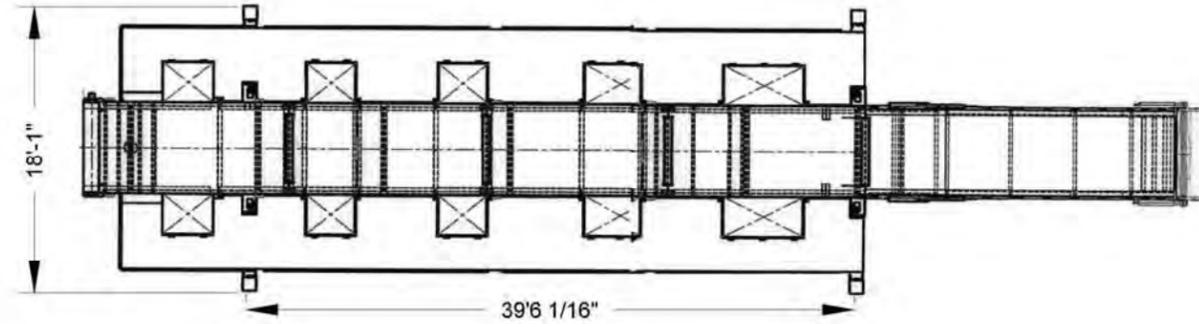




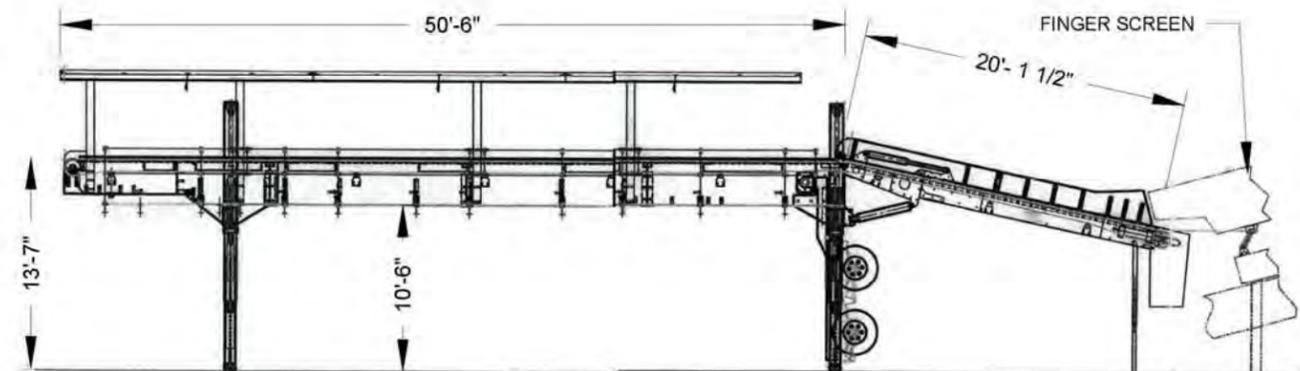
END VIEW - TRANSPORT



SIDE VIEW - TRANSPORT



END VIEW - PARKED



SIDE VIEW - PARKED

SHERBROOKE O.E.M. MOBILE SORT LINE

