EDCO RECYCLING AND TRANSFER FACILITY
Final Environmental Impact Report
Signal Hill, CA

State Clearinghouse No. 2008081009

Prepared for:

City of Signal Hill
2175 Cherry Avenue
Signal Hill, CA 90755-3799

Prepared by:

RGP Planning & Development Services
8921 Research Drive
Irvine, CA 92618

Applicant:

EDCO
224 S. Las Posas Road
San Marcos, CA 92078

February 2009

TABLE OF CONTENTS

Final Environmental Impact Report

EDCO Recycling and Transfer Facility

State Clearinghouse No. 2008081009

INTRODUCTION

CEQA REQUIREMENTS

Before approving a project, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (Final EIR). Section 15132 of the State CEQA Guidelines lists the required contents of a Final EIR as follows:

> *The Final EIR shall consist of*
>
> *(a) The Draft EIR or a revision of the Draft*
>
> *(b) Comments and recommendations received on the Draft EIR either verbatim or in summary*
>
> *(c) A list of persons, organizations, and public agencies commenting on the Draft EIR*
>
> *(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process*
>
> *(e) Any other information added by the Lead Agency*

The City of Signal Hill, as the Lead Agency, must also provide each public agency that commented on the Draft EIR with a copy of the City's response to those comments at least ten days before certifying the Final EIR. Members of the public and commenting agencies may review the Final EIR prior to certification.

PURPOSE OF THE FINAL EIR

The Final EIR serves as the environmental document to support approval of the Proposed Project, either in whole or in part. The State CEQA Guidelines (Section 15089[b]) state that the review of a final EIR should focus on the responses to comments on the Draft EIR.

After completing the Final EIR, and before approving the Project, the City of Signal Hill (Lead Agency) must certify the following pursuant to Section 15090 of the CEQA Guidelines:

(1) The final EIR has been completed in compliance with CEQA;

(2) The final EIR was presented to the decision-making body (City Council) of the City of Signal Hill, and that the City Council reviewed and considered the information contained in the final EIR prior to approving the project; and

(3) The final EIR reflects the City of Signal Hill's independent judgment and analysis.

These certifications, the Findings of Fact, and a Mitigation Monitoring and Reporting Program (MMRP) are included in separate documents that will be submitted to the City of Signal Hill for consideration prior to approval of the Proposed Project.

FINAL EIR CONTENTS

Part 1 – Draft EIR and Technical Appendices

The Draft EIR dated November 2008 describes the existing environmental conditions in the City of Signal Hill; analyzes potential impacts on those conditions due to the Proposed Project; identifies mitigation measures that could avoid or reduce the magnitude of significant impacts; evaluates cumulative impacts that would be caused by the Project in combination with other future projects or growth that could occur in the region; analyzes growth-inducing impacts; and provides a full evaluation of the alternatives to the Proposed Project that could eliminate, reduce, or avoid project-related impacts.

The Draft EIR and Appendices are not reproduced in this Final EIR. Although the public review and comment period is complete, those documents remain available for review in hardcopy and PDF formats at the following address:

City of Signal Hill
2175 Cherry Avenue
Signal Hill, California 90755-3799
Contact: Gary Jones, Director of Community Development
(562) 989-7345
GJones@CityofSignalHill.org

Part 2 – Responses to Comments on the Draft EIR

A period of 45 days (November 13 to December 29, 2008) was established for public review of the Draft EIR for the EDCO Recycling and Transfer Facility. Copies were sent to the State Clearinghouse for transmittal to all trustee, responsible, and other State agencies that may have an interest in the project. The Draft EIR was also distributed to organizations and individuals with an interest in the project, and to the local library to widen accessibility to the Draft EIR. In addition, the Notice of Availability of where the Draft EIR could be reviewed was published in the Signal Hill Tribune Newspaper. During the public review period, the City received six written comment letters on the Draft EIR.

This part contains a complete list of persons, organizations, and public agencies that commented on the Draft EIR; copies of the comment letters received by the City on the Proposed Project, and the Lead Agency's responses to those comments.

Part 3 – Draft EIR Errata and Modifications

This part contains all text and graphics changes to the Draft EIR, most of which are in response to comments on the Draft EIR. Modifications to the Draft EIR text are depicted as follows:

Black underline indicates text additions
~~Gray strikethrough~~ indicates text deletions

It is important to note that neither the errata nor the modifications change the conclusions regarding potentially significant effects or the ability of mitigation measures to avoid or substantially reduce those effects to a level that is less than significant.

PART 1

Draft EIR and Technical Appendices, November 2008

(Under separate cover at the City of Signal Hill Community Development Department)

PART 2

Responses to Comments on the Draft EIR

RESPONSES TO COMMENTS

ON THE

DRAFT ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NO. 2008081009

FOR THE

EDCO RECYCLING AND TRANSFER FACILITY

CITY OF SIGNAL HILL, CALIFORNIA

INTRODUCTION

A Draft Environmental Impact Report (Draft EIR) was prepared in November 2008 for the EDCO Recycling and Transfer Facility project located in the City of Signal Hill in Los Angeles County, California. The Draft EIR was made available for public review and comment pursuant to the California Environmental Quality Act (CEQA) Guidelines (Section 15087) from November 23 to December 29, 2008. During the public review period, the City of Signal Hill, as the CEQA Lead Agency, received six (6) comment letters and/or emails on the Draft EIR from public agencies. The City of Signal Hill has evaluated the comments and has prepared written responses to each pertinent comment relating to the adequacy of the environmental analysis contained in the Draft EIR.

The public review and comment period of the CEQA process solicits comments for the purposes of disclosing additional possible impacts, alternatives, or mitigation measures. Comments need to be supported by substantial evidence such as data, references, expert opinion, or other facts. This allows the Lead Agency to assess the impacts of a project based on the analysis provided by other responsible or concerned agencies, and provides the opportunity to amplify and explain better the analysis that the Lead Agency has undertaken to determine the potential environmental impacts of a project. To that extent, these Responses to Comments provide complete explanations to commenting agencies in order to improve the overall understanding of the project for the decision-making body.

The following agencies submitted comments during the public review period.

	Agency or Organization	Name	Date
A.	County of Los Angeles Fire Department, Fire Prevention Division	Jason Wiens, Plans Examiner *Fire Prevention Engineering*	Nov. 14, 2008
B.	State of California – Department of Toxic Substances Control (DTSC)	Greg Holmes, Unit Chief *Brownfields and Environmental Restoration Program - Cypress Office*	Nov. 19, 2008
C.	California Integrated Waste Management Board (CIWMB)	Raymond M. Seamans, Senior Integrated Waste Management Specialist *Waste Compliance and Mitigation Program, Permitting and LEA Support Division*	Dec. 5, 2008
D.	Long Beach Unified School District (LBUSD)	Carri M. Matsumoto, Executive Director *Facilities Development & Planning Branch*	Dec. 22, 2008

Agency or Organization	Name	Date
E. South Coast Air Quality Management District (SCAQMD)	Steve Smith, PhD, Program Supervisor, CEQA Section *Planning, Rule Development & Area Sources*	Dec. 24, 2008
F. County of Los Angeles Department of Public Health, Solid Waste Management Program	Gerry Villalobos, EHS IV (Acting)	Jan. 22, 2009

The following section includes the comment documents and the City's responses. Each comment document is identified with a letter in the upper right corner of the first page. The individual comments in each comment document have been given reference numbers that appear in the left margin next to the bracketed comments.

Comment Document A

COUNTY OF LOS ANGELES FIRE DEPARTMENT
FIRE PREVENTION DIVISION

Fire Prevention Engineering
5823 Rickenbacker Road
Commerce, Ca 90040-3027
Telephone 323-890-4125 Fax 323-890-4129

BUILDING PLAN REVIEW REQUIREMENTS

DATE: 11-14-2008 REGIONAL OFFICE: EAST REGION CERRITOS

PROJECT NAME: EDCO RECYCLING & TRANSFER FPD NO: FEPC 200802210

PROJECT ADDRESS: 2755 CALIFORNIA AVE CITY: SIGNAL HILL

BLDG. TYPE: II-B OCCUPANCY CLASSIFICATION: B,F-1,H-2,H-4 STORIES:

TOTAL BLDG AREA SQ. FT.: 62,673 REQUIRED SIDE YARDS: SPRINKLERS REQUIRED: 13

ARCHITECT/ APPLICANT: RICHARD JIMENEZ PHONE: 714 524-1870

A1 A building permit WILL NOT be issued prior to acceptance of the hydrant location, fire flow, and any additional requirements by the Department.

FOR QUESTIONS CONCERNING YOUR PROJECT CORRECTIONS, PLEASE CONTACT:

PLANS EXAMINER: JASON WIENS

NOTE: PLANS EXAMINER'S PHONE HOURS ARE BETWEEN 7:30 A.M. AND 10:30 A.M. ONLY, MONDAY THROUGH FRIDAY. OFFICE MEETINGS ARE BY APPOINTMENT ONLY.

SUBMIT FOUR CORRECTED ARCHITECTURAL SETS OF PLANS, FOR FINAL APPROVAL.

PLEASE MAKE EACH CORRECTION AS DIRECTED BELOW EACH REQUIREMENT.

The following deficiencies have been identified as not in compliance with applicable codes, standards, and Department regulations, as stated on the construction documents.

1. Provide a minimum unobstructed width of 26 feet, except for approved security gates in accordance with Section 503.6 and an unobstructed vertical clearance ¿clear to sky¿ Fire Department vehicular access to within 150 feet of all portions of the exterior building walls. Fire Code 503.2.1

   ACTION REQUIRED : Cross-hatch the Fire Department vehicle access on the site plan.

2. Fire Department vehicular access roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4

   ACTION REQUIRED : Provide note on site plan.

3. Building address numbers shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall be a minimum of 4 inches high with a minimum stroke width of 0.5 inch. Fire Code 505.1

   ACTION REQUIRED : Provide note on site plan.

4. A Key Box shall be provided and maintained at gated entrances, in accordance with Fire Code 506, and as set forth in Fire Department Regulation 5.

   ACTION REQUIRED : Provide note on site plan.

A1

5. The required fire flow for PUBLIC fire hydrants at this location is 2500 gpm, at 20 psi residual pressure, for a duration of 5 hours over and above maximum daily domestic demand. Fire Code 508.3 and Fire Department Regulation 8.

   ACTION REQUIRED : Provide note on site plan.

   The required fire flow is based on the following calculation:

fire flow:	5000 gpm
Increase 500 gpm for each story above ground floor:	0 gpm
Increase 500 gpm for a single exposure within 50 feet:	0 gpm
Increase for Hazardous Occupancy:	0 gpm
Reduction for fire sprinklers and/or construction type:	2500 gpm

6. All fire hydrants shall measure 6" x 4" x 2-1/2", brass or bronze, conforming to American Water Works Association Standard C503, or approved equal; and shall be installed in compliance with Fire Department Regulation 8. Fire Code 508.1.1

   ACTION REQUIRED : Provide note on site plan.

7. Complete and return the attached "Fire Flow Availability" Form 196. Fire Code 508.1.1

   ACTION REQUIRED : Provide attached form completed by the water purveyor.

Response to Comment Document A

County of Los Angeles Fire Department, Fire Prevention Division
November 14, 2008

Response No. A1

The Building Plan Review Requirements provide the City and the Applicant (EDCO) with a list of plan check items to ensure compliance applicable codes, standards, and Fire Department regulations. Those requirements have been provided to the Applicant's architect and/or engineer to be addressed in future architectural plan submittals. Since the Building Plan Review Requirements do not pertain to the adequacy of the environmental analysis in the Draft EIR, no further response is required.

(Page intentionally blank)

Comment Document B

Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

November 19, 2008

Mr. Gary Jones
Director of Community Development
City of Signal Hill
2175 Cherry Avenue
Signal Hill, California 90755-3799
GJones@CityofSignalHill.org

NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC HEARING FOR EDCO RECYCLING AND TRANSFER FACILITY PROJECT, CITY OF SIGNAL HILL (SCH # 2008081009), LOS ANGELES COUNTY

Dear Mr. Jones:

The Department of Toxic Substances Control (DTSC) has received your submitted draft Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document: "The proposed site for the EDCO Recycling and Transfer facility (Project) is about one mile south of U.S. Interstate 405 (San Diego Freeway); approximately one miles east of U.S. Interstate 710 (Long Beach Freeway); and approximately one mile north of State Route 1 (Pacific Coast Highway). The Project is the development of a +/- 68,000-sqaure-foot recycling and transfer facility on a 3.75-acre site in the City of Signal Hill. The Project study area is the entire block bounded by Patterson Street to the south, California Avenue to the east, and the 28th Street and Olive Avenue rights-of-way (Unimproved) to the north and west, respectively. The state of the art materials recovery/transfer station (MRF/TS) facility will serve as a point to accept, process, recover and transfer mixed municipal waste and residue following diversion activities to an appropriate permitted disposal facility. The Project will be built on a site which has been undeveloped for decades and is in a blighted condition due to past oil field operations with former sumps, pipelines, abandoned and active oil wells, and environmental contamination." DTSC has the following comments:

B1

1) The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances, and any known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the pertinent regulatory agencies:

Printed on Recycled Paper

B1

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- Envirostor: A Database primarily used by the California Department of Toxic Substances Control, at Envirostor.dtsc.ca.gov.
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

B2

2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC can enter an oversight agreement in order to review such documents. Please see comment No. 12 below for more information.

B3

3) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.

B4 4) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.

B5 5) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

B6 6) Project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

B7 7) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

B8 8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

B9 9) If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

Mr. Gary Jones
November 19, 2008
Page 4 of 4

B10 10) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented.

B11 11) If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

B12 12) DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies which would not be responsible parties under CERCLA, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

If you have any questions regarding this letter, please contact Mr. Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov or by phone at (714) 484-5491.

Sincerely,

Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814
gmoskat@dtsc.ca.gov

CEQA#2382

Response to Comment Document B

State of California – Department of Toxic Substances Control (DTSC)
November 19, 2008

Response No. B1

The potential for release of hazardous wastes/substances as a result of current or historic uses is addressed in Section 3.6 (Hazards and Hazardous Materials) of the Draft EIR, which summarizes two environmental assessments that were prepared for the Project Site. The information and analysis in that section is based on a Phase II Environmental Site Assessment (ESA) and a Human Health Risk Assessment (HHRA) prepared by Mearns Consulting LLC in October 2007 and September 2008, respectively. On-site soils were investigated for pesticide residues, VOCs, and other potentially hazardous substances. The Phase II ESA and the HHRA describe the environmental conditions at the Project Site. All information relating to the need for future site investigation and/or remediation has been provided in Section 3.6 of the Draft EIR. Provisions for pre-demolition inspections and remediation contingencies have been established as standard conditions and mitigation measures in the Draft EIR. Compliance with standard conditions and the implementation of mitigation measures would ensure that construction workers and the general pubic would not be exposed to any unusual or excessive risks related to hazardous materials during demolition activities.

Response No. B2

The City of Signal Hill (the City) has entered into a contract with the State of California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) to review assessment and investigation reports, including human health risk assessments (HRA), as part of the City's ongoing Brownfield redevelopment efforts. EDCO submitted the Phase II Environmental Site Assessment (Phase II ESA) and the HRA prepared for the site to the City for review and comment. The City forwarded these documents to OEHHA for review. OEHHA reviewed and approved the HRA in December 2008.

Additionally as this Brownfield site is an oil field with three operating pumping units and the historic use of the site was an oil field with nine previously abandoned oil wells located on-site, the constituents of concern include heavy-ends of total petroleum hydrocarbons indicative of crude oil.

EDCO is working with the State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) regarding the oil wells and will continue to monitor for volatile organic compounds (VOCs) as required by the Air Quality Management District (AQMD) Rule 1166 Site Specific Mitigation Soils Plan for excavating and grading site soils.

Response No. B3

A Phase II ESA was prepared for the subject property in October 2007. A Human Health Risk Assessment was prepared in September 2008. The results of these studies are discussed in Section 3.6 (Hazards and Hazardous Materials). The complete reports are included on a CD of the Draft EIR. A Phase I ESA was prepared in 2001. This document is on file at the City of Signal Hill Planning Department.

Response No. B4

Investigation, sampling and remedial actions have been conducted, as summarized in the Draft EIR. The comment and approval letter for the Human Health Risk Assessment from OEHHA is included as Attachment A to these responses to DTSC comments. EDCO is awaiting certification of the EIR before proceeding with additional environmental work on-site.

Response No. B5

The site is vacant, unpaved land; therefore, this comment does not apply.

Response No. B6

Volatile organic compound (VOC) monitoring in compliance with the South Coast Air Quality Management District's (SCAQMD) Rule 1166 Site Specific Soil Mitigation Plan will occur during site grading activities. Soil that exceeds the 50 parts per million (ppm) threshold for VOCs will be stockpiled on plastic sheeting, covered with plastic sheeting, profiled for off-site disposal and disposed appropriately in accordance with State of California regulations.

Any import will be sampled and analyzed for the following constituents: (1) volatile organic compounds will be collected via USEPA method 5035B and analyzed via USEPA method 8260B, (2) semi-volatile organic compounds will be analyzed via USEPA method 8270C, total threshold limit concentration (TTLC) metals will be analyzed via USEPA methods 6000/7000 series, (3) total petroleum hydrocarbons-gasoline range, -diesel range, and speciated carbon chains will be analyzed via USEPA method 8015B, (4) organochlorine pesticides will be analyzed via USEPA method 8081A.

Response No. B7

Volatile organic compound (VOC) monitoring in compliance with the South Coast Air Quality Management District's (SCAQMD) Rule 1166 Site Specific Soil Mitigation Plan will occur during site grading activities. The VOC monitoring will ensure that the health and safety of the workers are protected while exposed to site soils during the grading activities.

Section 3.5 (Air Quality) of the Final EIR will include the location of the nearest sensitive receptors (Figure 3.5-1). The nearest work facility is a warehouse on Atlantic Avenue between East 28th Street and East Patterson Street. The distance from the project property line to the warehouse parking lot is approximately 162 feet. The nearest hospital is Long Beach Memorial Medical Center located on Long Beach Boulevard between East Patterson Street and East Columbia Street. The distance from the project property line is approximately 920 feet. The nearest school is Jackie Robinson Academy on Pine Avenue located 3,000 feet west of the project property line. The nearest residences are located on the west side of Lime Street between East 27th Street and Walton Avenue, southwest of the project property line. The distance from the project property line is approximately 625 feet. The cancer risk to sensitive receptors is well below the threshold of one in 10 million.

Response No. B8

The project itself will not be a hazardous waste generator. It will, however, accommodate the storage and off-site transport and disposal of hazardous materials inadvertently brought to the proposed facility. The facility will have a stringent load check program for the identification and sequestration of hazardous materials during initial screening of incoming loads. Those materials will be recovered, stored and shipped in a manner and protocol further described in the Transfer and Processing

Report (TPR) as a component of the Solid Waste Facility Permit (SWFP) as issued by the Local Enforcement Agency (LEA). Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. B9

The comment addresses the need for regulatory clearance if the project would involve the discharge of wastewater to a storm drain. In the near term, during project construction, the project will comply with all requirements of the State Construction Activity General Permit (NPDES No. CAS000002, Order No. 99-08-DWQ) for storm water discharges associated with construction activity. The project applicant will submit a Notice of Intent (NOI) and fee payment to the Los Angeles Regional Water Quality Control Board (LARWQCB) prior to commencement of construction activities in order to obtain authorization for proposed storm water discharges. Authorization will not be granted until the applicant develops an acceptable Storm Water Pollution Prevention Plan (SWPPP), including a Monitoring and Reporting Program and a Post-Construction Management Plan designed and implemented such that storm water discharges and authorized non-storm water discharges will not cause or contribute to an exceedance of any applicable water quality standards contained in the Basin Plan. The SWPPP shall implement controls to reduce pollutants in storm water discharges from the Project Site to the BAT/BCT performance standard.

In the long term, during the operational life of the project, the project will comply with the local regulations associated with the Regional Board's Municipal Stormwater Permit issued to Los Angeles County and co-permittees under NPDES No. CAS004001 and Waste Discharge Requirements Order No. 01-182. This includes the Standard Urban Storm Water Mitigation Plan (SUSMP) and all related implementing local ordinances and regulations for the control of stormwater pollution from new development and redevelopment.

Response No. B10

The City of Signal Hill is in the Long Beach Groundwater Plain. Underlying aquifers include (from shallowest to deepest) the Gage, Hollydale, Jefferson, Lynwood, Silverado and Sunnyside aquifers. The underlying aquifers are found starting at depths of approximately 50-100 feet below ground surface. These aquifers are separated from one another by aquitards composed of relatively impermeable, fine-grained sediments. The site is immediately underlain by the Bellflower Aquiclude. Depth to groundwater underlying the site is at least 125-feet below ground surface (Mearns 2008), and groundwater was not encountered during the borings for the Phase II environmental site assessment.

Groundwater supplies will not be adversely impacted by the proposed development. The project does not propose construction of any groundwater wells since public water sources will be provided to the site via municipal transmission mains. No impact to groundwater supplies or recharge areas is expected. However, if groundwater contamination is suspected during construction/demolition of the Proposed Project, operations will cease and the appropriate measures will be instituted.

Response No. B11

The comment requires specific remedial investigation for land areas associated with agricultural or livestock related activities. As discussed in Section 3.2 (Land Use and Planning), historic, present, and planned uses at the Project Site are not related to agricultural or livestock activities.

Response No. B12

Comment noted. Based on the information above, no further response is necessary.

(Page intentionally blank)

Attachment A to Response to Comment Document B

Office of Environmental Health Hazard Assessment

Joan E. Denton, Ph.D., Director
Headquarters • 1001 I Street • Sacramento, California 95814
Mailing Address: P.O. Box 4010 • Sacramento, California 95812-4010
Oakland Office • Mailing Address: 1515 Clay Street, 16th Floor • Oakland, California 94612

Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Susan Mearns
Mearns Consulting, Inc
738 Ashland Avenue
Santa Monica, CA 90405

Ken Farfsing
City of Signal Hill
2175 Cherry Avenue
Signal Hill, CA 90755

FROM: Jim Carlisle, DVM, Senior Toxicologist
Integrated Risk Assessment Branch

DATE: December 9, 2008

SUBJECT: HUMAN HEALTH RISK ASSESSMENT FOR 3.287-VACANT LAND LOCATED AT THE CORNER OF PATTERSON STREET AND CALIFORNIA AVENUE, SIGNAL HILL, CA OEHHA # 830046-00

Document Reviewed

I reviewed the Human Health Risk Assessment for 3.287-Vacant Land, Signal Hill, CA by Mearns Consulting, LLC, dated September 29, 2008

Site Characterization

An accurate estimate of risk from contamination at a site requires accurate characterization of contaminant concentrations at the site. Three aspects are key to achieving this:

- Sampling strategy: Sampling locations must represent the site as a whole or at least not avoid significant contamination.
- Sample handling: Samples must be handled in such a way that chemical is not lost before the analysis can take place.
- Sample analysis: Samples of appropriate environmental media must be analyzed for an appropriate suite of chemicals that may be present at the site based on the site history.

My review is based on the assumption that these conditions were met.

Susan Mearns
Ken Farfsing
12/9/2008
Page 2 of 2

Conceptual Site Model

- The assessment assumes industrial and construction scenarios, evaluating the following pathways:
  - indoor exposure to inhaled VOCs (industrial only)
  - outdoor exposure to inhaled VOCs and particles
  - outdoor exposure to soils by ingestion and dermal contact.
- Ecological and residential assessments were not included
- Ground water was not considered as an exposure medium.

Vapor intrusion results

- Benzene was detected in soil vapor at a concentration less than the commercial/industrial CHHSL. Thus, there is no significant risk from inhalation of indoor vapors

Soils exposure results

- Page 17 does not appear to include exposure parameters for construction workers.
- The "Estimated Risks and Hazards" table does not identify the scenario being evaluated.
- The "Notes" below the "Estimated Risks and Hazards" table refer to DTSC (1999) fig 5 and 7 and equation 2.8. Since the DTSC equations were not used exactly as presented in fig 5 and 7 (DTSC, 1999), this could be confusing to a reader who did not carefully read sections 7.1 and 7.2. A more accurate reference would be to sections 7.1 and 7.2.
- My calculations indicated a risk of 2.5×10^{-5} for current/future onsite outdoor workers, slightly lower than the 3.3×10^{-5} value in the report. This risk is primarily due to exposure to arsenic. However, actual risk is probably lower, since the highest arsenic levels are at 20-25 feet depth where exposure to these workers is unlikely.
- My calculations indicated a lower risk of 3.7×10^{-6} for current/future onsite construction workers.
- It is possible that arsenic concentrations are equivalent to local background levels.

Conclusions

- Risks due to benzene infiltration into indoor air are less than significant.
- Risks and hazards due to other VOCs and metals other than arsenic are less than significant.
- Only arsenic is a significant contributor to cancer risk at this site.
- Upper-bound risk estimates are about 3×10^{-5} for outdoor transfer station workers. Actual risks for these workers are probably lower, since the highest arsenic levels are at 20-25 feet depth where exposure is unlikely.
- The upper-bound lifetime cancer risk to current/future onsite construction workers is estimated at 3.7×10^{-6}.
- As stated in the report, the upper-bound lifetime cancer risks due to arsenic in soils are within U.S. EPA's "safe and protective of public health" risk management range of 10^{-6} to 10^{-4}.

If you have any questions, call me at 916-323-2635 or e-mail JCarlisle@OEHHA.CA.GOV.

Reviewed by:
Hristo Hristov, MD, PhD

Comment Document C

LINDA S. ADAMS
SECRETARY FOR ENVIRONMENTAL PROTECTION

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

ARNOLD SCHWARZENEGGER
GOVERNOR

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812-4025
(916) 341-6000 • WWW.CIWMB.CA.GOV

MARGO REID BROWN
CHAIR
MBROWN@CIWMB.CA.GOV
(916) 341-6051

SHEILA KUEHL
SKUEHL@CIWMB.CA.GOV
(916) 341-6039

JOHN LAIRD
JLAIRD@CIWMB.CA.GOV
(916)341-6010

ROSALIE MULÉ
RMULE@CIWMB.CA.GOV
(916) 341-6016

GARY PETERSEN
GPETERSEN@CIWMB.CA.GOV
(916) 341-6035

December 5, 2008

Mr. Gary Jones
Director of Community Development
City of Signal Hill Redevelopment Agency
2175 Cherry Avenue
Signal Hill, CA 92395-5850

Subject: **SCH No. 2008081009** – Draft Environmental Impact Report for the Construction and Operation of the EDCO Recycling and Transfer Facility, a Solid Waste Transfer Station in the City of Signal Hill, SWIS No. (Not Assigned), Los Angeles County

Dear Mr. Jones:

Thank you for allowing the California Integrated Waste Management Board's (Board) staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

C1

Board staff has reviewed the environmental document cited above and offers the following project description, analysis and our recommendations for the proposed project based on our understanding of the project. If the Board's project description varies substantially from the project as understood by the Lead Agency, Board staff requests incorporation of any significant differences in the Final Environmental Impact Report.

Project Description

The City of Signal Hill, Redevelopment Agency, acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report proposing to construct and operate a Recycling and Transfer Facility. The site is approximately 3.75 acres in a blighted condition due in part to past

oil field operations with former sumps, pipelines, abandoned and active oil wells and significant environmental contamination. Site topography is relatively level and bound by Patterson Street on the south, California Avenue to the east and the 28th Street and Olive Avenue rights-of-way to the north and west respectively.

The proposed projects major components are:

- Change in zoning from CG (General Commercial) to Specific Plan (SP-19)
- Amend the Zoning Ordinance to add a new planning area – Planning Area 3
- Vacation of a "paper" alley between Olive and California Avenues
- Vacation of Olive Avenue right-of-way between 28th and Patterson Streets
- Lot Merger
- Conditional Use Permit
- Amendment to the Non Disposal Facility Element
- Amendment to the County Solid Waste Management Plan
- Development of a 68,000 +/- square feet Recycling and Transfer Facility
  - Office/Administration area
  - Employee area
  - Operations, material recovery facility, transfer/self haul/load out area
  - Greenwaste area
  - Construction debris area
- Separate maintenance area
- A certified buyback operation for used beverage containers

The design capacity of the Recycling and Transfer Facility would be 1500 tons per day with peak daily traffic count of 589 round trips or 828 PCE (passenger car equivalent) round trips.

Current land is all disturbed with continuing use for oil production – six areas totaling .34 acres. e-waste will be accepted at no charge to the residents of the City of Signal Hill; EDCO will also endeavor to establish a permitted Household Hazardous Waste facility on-site.

Proposed Entitlements for a Full Solid Waste Facilities Permit

Permitted Area	3.75 +/- acres
Peak Daily Tonnage	1500 tons per day
Peak Daily Vehicle Count	589 round trips or 828 PCE round trips
Days of Operation	Up to 7 days per week
Hours of Operation	Up to 24 hours per day
Design Capacity	1500 tons per day
Community Clean-Up Days	4 per year[1]

1 - Two of the days will be curb-side and two will be for bulky items on-call

The following environmental impacts were found to be potentially significant and/or of sufficient public controversy to warrant inclusion in this Draft Environmental Impact Report. The following environmental topics were addressed:

- Land Use and Planning
- Traffic and Circulation
- Air Quality
- Noise
- Hazards and Hazardous Materials
- Aesthetics
- Biological Resources
- Cultural Resources
- Hydrology and Water Quality
- Mineral Resources

All ten areas that might have potentially significant impact and/or of sufficient public controversy were determined to be less than significant or less than significant after mitigation.

BOARD STAFF'S COMMENTS

For clarity and convenience, questions and comments that Board staff is seeking a specific response to will be *italicized* so the reader can more easily locate and respond to them.

C2

Environmental Justice

Board members have taken a proactive stance towards environmental justice and expect that it be included and considered in projects coming before them for concurrence. *Please describe any impacts as a result of this proposed project on the fair treatment of all people regardless of race, color, national origin or income within the reasonably immediate area.*

Acceptable Waste

Types of waste to be received at the Recycling and Transfer Facility, based on information in the environmental document, would be limited to the following:

- Mixed Municipal Waste
- Green Waste
- Construction Debris
- Used Beverage Containers
- e-waste for City residents
- Household Hazardous Waste (tentative)

C3

Mixed Municipal Waste would be defined as:

> "...putrescible and non—putrescible solid, semi-solid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, street sweepings, recyclables, and catch basin residue"

If there are any other types of waste to be accepted please detail them in the Final Environmental Impact Report.

Tonnage

C4

All material that enters the transfer station must pass over the scale and be accounted for save supplies and equipment.

CONCLUSION

The Board staff thanks the Lead Agency for the opportunity to review and comment on this Draft Environmental Impact Report and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

C5

The Board staff requests copies of any subsequent environmental documents including, the Final Environmental Impact Report, the Report of Facility Information/Joint Technical Document, any Statements of Overriding Consideration, copies of public notices, and any Notices of Determination for this project.

Please refer to 14 CCR, § 15094(d) that states: "If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse]."

C5

The Board staff requests that the Lead Agency provide a copy of its responses to the Board's comments at least ten days before certifying the Final Environmental Impact Report. Refer to Public Resource Code, Section 21092.5(a).

If the document is certified during a public hearing, Board staff request ten days advance notice of this hearing. If the document is certified without a public hearing, Board staff requests ten days advance notification of the date of the certification and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6728 or e-mail me at rseamans@ciwmb.ca.gov.

Sincerely,

Raymond M. Seamans
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
Environmental Review
California Integrated Waste Management Board

Cc: Bill Marciniak
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
South Branch Permitting, Region 4
California Integrated Waste Management Board

Lillian Conroe, Supervisor
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
South Branch Permitting, Region 4
California Integrated Waste Management Board

Susan Markie, Branch Manager
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
South Branch Permitting
California Integrated Waste Management Board

Ken Murray, Chief
Pete Oda, Supervisor
Department of Health Services
5050 Commerce Drive
Baldwin Park, CA 91706

(Page intentionally blank)

Response to Comment Document C

California Integrated Waste Management Board
December 5, 2008

Response No. C1

The California Integrated Waste Management Board's understanding of the project description and representation of the environmental impacts identified in the Draft EIR is correct.

Response No. C2

Environmental justice focuses on environmental and human health conditions in areas of high minority populations and low-income communities. Adverse environmental justice impacts occur when a project's impacts have the potential to affect areas of high-minority populations and low-income communities disproportionately. The Proposed Project is located in the City's Atlantic/Spring Neighborhood subplanning area. This neighborhood contains the single largest vacant land area remaining in the City and remains largely vacant due to the multiple constraints to development such as on-going independent oil production activities, contaminated soils, small lot sizes, fragmented ownership patterns, and lack of infrastructure. This neighborhood is designated General Industrial in the General Plan. Implementation of the Proposed Project will improve environmental conditions in a portion of the Atlantic/Spring Neighborhood. There are no high minority populations or low-income communities in this neighborhood. Therefore, the Proposed Project will not result in significant adverse impacts relative to Environmental Justice.

The *EDCO Transfer Station Air Quality Impact Analysis* prepared by Air Permitting Specialists in October 2008 was the basis for Section 3.5 (Air Quality) of the Draft EIR. The Air Quality Analysis indicated that the Proposed Project could have a direct increase in local emissions with potential health consequences to sensitive receptors near the Project Site and along the proposed truck routes. Given those circumstances, the project warranted an emissions analysis using the SCAQMD's Localized Significance Threshold (LST) methodology, as well as a risk assessment of the cancer and non-cancer hazards of diesel exhaust emissions.

LSTs were developed in response to the SCAQMD Governing Board's *Environmental Justice Enhancement Initiative I-4*. 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 for oxides of nitrogen (NO_X), carbon monoxide (CO), and particulate matter less than 10 microns in aerodynamic diameter (PM_{10}). LSTs are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. This focus on local environmental conditions and exposed populations is one of the basic underpinnings of environmental justice initiatives.

With the use of Project controls and well as compliance with California Air Resource Board (CARB's) and South Coast Air Quality Management District (SCAQMD's) rules, the Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. As shown in Section 3.5 (Air Quality), Table 3.5-8, total on-site emissions for NO_X are 6.73 pounds per day. The NO_X LST is 99 pounds per day. The Proposed Project is well under the LST for NO_X. The LST for CO, PM_{10}, and $PM_{2.5}$ are 1,100, 7, and 3 pounds per day, respectively. The total on-site emissions for CO, PM_{10}, and $PM_{2.5}$ for the Proposed Project are 15.2, 3.36, and 0.32 pounds per day, respectively. Each of these generated emissions is well under the LST for each pollutant.

Therefore, the Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Response No. C3

Comment noted. The types of waste to be accepted are as described in the Draft EIR. If changes are requested by the applicant, those will be identified in the Transfer and Processing Report (TPR) as a component of the Solid Waste Facility Permit (SWFP) as issued by the Local Enforcement Agency (LEA). Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. C4

Comment noted. This and other operational features will be identified in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. C5

The City will work with CIWMB to provide print and/or electronic copies of the requested environmental documents, including those pursuant to CEQA. Upon project approval, a Notice of Determination will be filed with the State Clearinghouse and the County of Los Angeles.

CIWMB is in receipt of these Responses to Comments pursuant to CEQA. Each recipient of these Responses to Comments has also received the City's Public Hearing Notice apprising them of the dates and times of public review and approval hearings.

Comment Document D

long beach unified school district

BUSINESS DEPARTMENT - Business Services
Facilities Development & Planning Branch
Donald K. Allen Building Services Facility
2425 Webster Ave., Long Beach, CA 90810
(562) 997-7550 Fax (562) 595-8644

December 22, 2008

Via email: GJones@CityofSignalHill.org
Via US mail
Via Facsimile: 562-989-7393

Gary Jones, Director of Community Development
City of Signal Hill
Department of Community Development
2175 Cherry Avenue
Signal Hill, California 90755

Re: Comments on Draft Environmental Impact Report for the EDCO Recycling and Transfer Facility, Signal Hill, CA

Dear Mr. Jones,

The Long Beach Unified School District (District) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed EDCO Recycling and Transfer Facility (Project). The District previously submitted comments (dated September 6, 2008) on the Notice of Preparation (NOP) for the DEIR.

BACKGROUND

Long Beach Unified School District is fully responsible for providing school facilities and public education services to approximately 88,000 students in 95 public schools in the cities of Long Beach, Lakewood, Signal Hill, and Avalon on Catalina Island. It is the third-largest school district in the state of California and employs more than 8,000 teachers and staff. In addition to establishing high standards of academic excellence for its students, LBUSD is committed to providing a safe environment and school facilities for its students and employees. The District's primary concern in its review of the draft EIR for the EDCO Project is to distinguish the environmental impacts which must be properly addressed, analyzed, and mitigated to assure an environment conducive to learning.

COMMENTS

D1

Teacher Resource Center
The LBUSD's Teacher Resource Center (TRC; located at 1229 32nd Street, Signal Hill) is situated on property contiguous with John Burroughs Elementary School (located at 1260 E. 33rd St, Signal Hill). The Burroughs school playground area and classrooms at the Teacher Resource Center are located a few feet from the curb of 32nd Street, which is

a designated truck route for the EDCO Project. In addition, classrooms at the TRC are located directly across from the northbound 405 Freeway on- and off-ramps. These on- and off-ramps (which feed onto 32nd Street) also are designated by the DEIR as traffic routes for northbound trucks going to/from the proposed EDCO facility.

Truck traffic serving the EDCO Project would include large transfer trucks (22-ton) and collection trucks (7-ton) that likely will be diesel-powered. It is anticipated that the TRC classrooms and the Burroughs school playground could be adversely impacted by noise and diesel particulate matter emissions from the Project trucks due to their large size and the close proximity of the truck route. In addition, ingress and egress for the TRC is on 32nd Street, between Orange Avenue and the on/off ramps to the Freeway. As a result, the regular presence of large trucks on 32nd Street may impact ingress/egress for the TRC, and could potentially become a safety hazard.

D1

The Teacher Resource Center is designed to coordinate the District's central instructional resources, curriculum support and professional development in a central location to better serve the teachers of the Long Beach Unified School District. The TRC is a critical component of LBUSD's strategic professional development of teachers and staff in alignment with District goals related to academic excellence. The TRC typically is open Monday through Friday from 8:00 a.m. - 4:30 p.m. with the Science/Math Resource Center and other departments having extended hours until 5:30 p.m. Monday through Thursday. The TRC also is open on Saturdays periodically.

Project Truck Traffic

The DEIR indicates that up to six (6) Project trucks per hour will travel along 32nd Street. The DEIR analyzed Level of Service (LOS) at two intersections on 32nd Street (the freeway on/off ramp stops, and the Orange Avenue signal). Based on this analysis, the DEIR concludes that the Project is not expected to increase congestion beyond designated significance thresholds. However, the DEIR does not address the noise, air quality, ingress/egress, and safety impacts that may result from the six large trucks per hour that will travel *a few feet* from the Teacher Resource Center classrooms and Burroughs school playground.

D2

Potential Impacts

It is anticipated that single event noise impacts from the Project trucks, which include 22-ton "transfer trucks," may adversely impact the teaching and learning process in the Teacher Resource Center classrooms located a few feet away from the truck route. In addition, diesel PM emissions from passing trucks could have adverse public health impacts to the Teacher Resource Center and Burroughs Elementary School playground.

D3

The Traffic Impact Analysis (Volume-to-Capacity Worksheets) for the DEIR depicts at least two lanes in each direction (east and west) on 32nd Street at both the Orange Avenue and freeway ramp intersections. However, observation of 32nd Street between these two intersections indicates the roadway lacks continuous stripes designating multiple lanes. Ingress and egress for the Teacher Resource Center may be adversely impacted by the

D4

D4 presence of 4 to 6 large trucks per hour on what amounts to a freeway on/off ramp without lane markers.

D5 The DEIR indicates the Orange Avenue and 32nd Street intersection is projected to have a Level of Service of "F" (severe congestion impacts) in 2010, based on "Project plus cumulative conditions." The DEIR concludes that no traffic mitigation is required because "the project's incremental contribution to those impacts (i.e., the Project-related change over 2010 No-Project conditions) is less than significant." Despite this assertion, it is our opinion that the number and *size* of Project trucks *will* contribute to the severe traffic congestion expected at this intersection. In addition, we anticipate the large size of the Project trucks will exacerbate the anticipated adverse impacts on ingress/egress at the Teacher Resource Center.

CONCLUSION

D6 The DEIR should consider potential impacts to the LBUSD's Teacher Resource Center. In particular, the DEIR should evaluate potential adverse impacts to the Center (and the adjacent play area of Burroughs Elementary School) from EDCO truck traffic using the northbound I-405 freeway on- and off-ramps at 32nd Street.

The District appreciates the opportunity to participate in this process and we look forward to working with the applicant and the city of Signal Hill in a continuing review and assessment of potential impacts associated with the Project, and the development and implementation of effective mitigation.

If you have any questions, please feel free to contact me at 562-997-7550.

Sincerely,

Carri M. Matsumoto
Executive Director
Facilities Development & Planning Branch
Long Beach Unified School District

cc: Chris Steinhauser – LBUSD Superintendent of Schools
Kim Stallings – LBUSD Chief Business & Financial Officer
Karl Rodenbaugh – The Planning Center
Facilities File

(Page intentionally blank)

Response to Comment Document D

Long Beach Unified School District (LBUSD)
December 22, 2008

Response No. D1

Traffic

32nd Street provides access to the northbound I-405 Freeway. The section of 32nd Street east of Orange Avenue is approximately 550 feet long and terminates immediately east of the freeway ramps at an alley providing access to two businesses. The alley is gated at Walnut Avenue which does not allow through traffic. The 32nd Street roadway is 48 feet wide with only a centerline stripe. On-street parking is allowed. The northbound I-405 off-ramp is controlled by a stop sign with traffic on 32nd Street having no stop sign. There is no posted speed limit on 32nd Street east of Orange Avenue.

As discussed in the Traffic Study, approximately ten percent of Project trucks will use the 32nd Street/Orange Avenue on- and off-ramps from northbound I-405. This equates to approximately four trucks per hour (two eastbound and two westbound) with a maximum of six trucks (three eastbound and three westbound) during the one highest hour of the day. These trucks will be of a size comparable to trucks that currently use this section of 32nd Street. Inbound Project trucks from the northbound I-405 Freeway will make a northbound left turn at the ramp and travel west to Orange Avenue where they will make a left turn onto Orange Avenue at the signal and proceed south. Outbound Project trucks will make a northbound right turn from Orange Avenue to eastbound 32nd Street and make a right turn onto the I-405 Freeway on-ramp. Project trucks will pass the TRC at a rate of one truck every 15 minutes throughout the day, with a rate of one truck every 10 minutes during the one highest hour of the day.

The parking lot for the TRC has two driveways. One driveway is located between Orange Avenue and the northbound I-405 on- and off-ramps at the western parking lot boundary, and the second driveway is located east of the I-405 ramps at the eastern parking lot boundary. Drivers can enter and exit the eastern TRC driveway with no interference from Project traffic.

The eastern driveway may not be as heavily used by TRC drivers as the western driveway. Vehicles entering the western TRC driveway from eastbound 32nd Street have to yield to westbound through traffic, including traffic from the northbound I-405 off-ramp. The Project will add three trucks to the westbound through traffic on 32nd Street during the one highest hour of the day and two trucks per hour during the remainder of the day. There is no left-turn pocket eastbound on 32nd Street for vehicles to wait in; however, the roadway is sufficiently wide to allow eastbound vehicles to pass a vehicle waiting to turn left into the driveway.

The Project will add an insignificant amount of traffic (approximately one percent of the existing peak hour volume) to 32nd Street of the type of vehicles currently using the roadway (passenger vehicles as well as large trucks). The Project will not alter existing or future safety conditions along 32nd Street east of Orange Avenue.

Noise

This response to concerns raised about potential noise impacts upon the Teacher Resource Center (TRC) classrooms and the Burroughs school playground applies to all such mentions in the LBUSD comment letter. The same noise issues are raised in Comments D2 and D3 and this response sufficiently clarifies the issues for all general and specific mentions of potential noise effects on LBUSD facilities.

The project traffic study indicates a total of 5 passenger car equivalents (PCE) exiting on 32nd Street and 5 PCE entering the freeway at this ramp. One large truck is 2 PCE. There are therefore typically 2 to 3 project trucks in the a.m. peak hour entering or exiting the freeway. On the freeway mainline, Caltrans estimates that there are currently 15,642 trucks per day out of a total daily volume of 287,000 vehicles. The noise level from 5 trucks per hour at 50 feet from the off-ramp is 57 dB. The noise level from 20,000+ vehicles per hour driving on the freeway at 400 feet from the closest TRC structure is 77 dB. The combined noise from the background plus the project contribution is 77.05 dB. The human discrimination threshold under laboratory conditions is approximately 1.5 dB. The change in the noise level resulting from the limited project noise increment will be imperceptible in light of the markedly elevated background level. If the TRC can function effectively within 400 feet of a freeway and not experience substantial noise intrusion, the small project increment will not "adversely impact the teaching and learning processes" in the TRC as suggested in the comment.

Diesel Particulate Emissions

The addition of up to six trucks per hour would generate some additional dust and diesel particulate in the vicinity of the Teacher's Resource Center (TRC). The major source of dust and diesel particulate is Interstate 405 which is located 450 feet south of the TRC. Approximately 20,000 vehicles per hour travel along I-405. Twenty percent of this traffic volume is trucks, or 4,000 trucks per hour. This volume of truck traffic leads to a high background concentration of dust and diesel particulate. While the six additional trucks per hour would emit some additional dust and diesel particulate, the incremental impact would not be significant.

Response No. D2

As pointed out in the Traffic Impact Analysis, the Proposed Project will add four to six trucks per hour to 32nd Street east of Orange Avenue. These trucks will be of a size comparable to trucks that currently use this section of 32nd Street. The Burroughs Elementary School playground is surrounded by a fence which prevents children from entering the roadway and school warning signs are posted on westbound 32nd Street. The Project will not alter existing or future safety conditions along 32nd Street east of Orange Avenue.

Response No. D3

Noise

Please refer to Response No. D1.

Diesel PM Emissions

Please refer to Response No. D1.

Response No. D4

Vehicles entering the western TRC driveway from eastbound 32nd Street have to yield to westbound through traffic, including traffic from the northbound I-405 off-ramp. There is no left-turn pocket eastbound on 32nd Street for vehicles to wait in; however, the roadway is sufficiently wide to allow eastbound vehicles to pass a vehicle waiting to turn left into the driveway. The Project will add three trucks to the westbound through traffic on 32nd Street during the one highest hour of the day and two trucks per hour during the remainder of the day, which will not noticeably increase the delay or effect the safety of vehicles entering the western TRC driveway.

The Project will add an insignificant amount of traffic (approximately one percent of the existing peak hour volume) to 32nd Street of the type of vehicles currently using the roadway (passenger vehicles as well as large trucks). The Project will not alter existing or future safety conditions along 32nd Street east of Orange Avenue.

Response No. D5

The Traffic Impact Analysis evaluated the Project's impacts on the Orange Avenue/32nd Street and I-405 NB/32nd Street intersections during the AM and PM peak hours. As explained in the Traffic Study, Project truck traffic was inflated for the analysis based on a passenger car equivalent (PCE) factor. The results of that peak hour analysis show that the addition of Project traffic, including approximately four trucks (two eastbound and two westbound) which arrive at an average of one truck every 15 minutes during the AM and PM peak hours, does not create a significant impact, as defined by the City of Signal Hill and Caltrans, at these study intersections. Additionally, Project trucks will be of a size comparable to trucks that currently use this section of 32nd Street. The Project will not significantly impact congestion along 32nd Street east of Orange Avenue.

Response No. D6

The Project will add an insignificant amount of traffic (approximately one percent of the existing peak hour volume) to 32nd Street of the type of vehicles currently using the roadway (passenger vehicles as well as large trucks). The Project will not alter existing or future safety conditions along 32nd Street east of Orange Avenue.

Although the Project has no significant impact on the traffic or safety on 32nd Street east of Orange Avenue, on-street parking could be prohibited and the street restriped to provide an eastbound left-turn pocket into the western TRC driveway.

(Page intentionally blank)

Comment Document E

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: DECEMBER 24, 2008 December 24, 2008

Mr. Gary Jones
Director of Community Development
City of Signal Hill
2175 Cherry Avenue
Signal Hill, CA 90755-3799

Draft Environmental Impact Report (DEIR) for the Proposed EDCO Recycling and Transfer Facility Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely

Steve Smith, P.h.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC081112-07
Control Number

Mr. Gary Jones, -1- December 24, 2008
Director of Community Development

Air Quality Analysis - Construction

E1

1. When discussing air quality significance thresholds to be used to determine whether or not air quality impacts are significant, the lead agency identifies a number of potential significance thresholds, including the LSTs recommended by the SCAQMD for use by other public agencies. It is recommended that the lead agency also use the SCAQMD recommended regional significance thresholds (see http://www.aqmd.gov/ceqa/handbook/signthres.pdf) when determining air quality significance.

E2

2. Table 3.5-5 on page 3.5-9 appears to show peak daily construction air quality impacts. Review of the URBEMIS2007 output sheets in Appendix D shows different peak daily construction emissions than are shown in Table 3.5-5. In the Final EIR, please explain or correct this apparent inconsistency.

Air Quality Analysis - Operation

E3

3. In Section 3.5.4 the lead agency concludes that the proposed project's air quality impacts do not exceed any significance thresholds and, therefore, no mitigation is required. However, review of Table 3.5-8 shows that total daily NOx emissions (both on-site and off-site) substantially exceed the NOx regional significance threshold of 55 pounds per day. Table 3.5-8 should be revised accordingly.

   On page 3.5-12, the lead agency states that operational air quality impacts are not significant because the mobile source emissions would continue to occur as a result of transport of wastes to local landfills. SCAQMD staff strongly disagrees with the displaced truck trip methodology used by the lead agency that incorrectly suggests that the proposed project will reduce emissions. The proposed project will not eliminate truck trips that would otherwise haul biosolids and biomass to other locations because of increasing population growth and the associated future increases in the amount of waste materials generated locally. Further, there is no analysis that the other truck trips would be eliminated to support such an assumption. The only way the lead agency can take credit for the displaced truck trips is to prohibit them through some legally binding agreement. The SCAQMD has always advocated that a project analyzed in a CEQA document take responsibility for all of the emissions generated by the proposed project. It is likely that eliminating the inappropriate credit for displaced truck trip emissions would result in significant operational NOx emissions. As a result, mitigation measures would be required.

Health Risk Assessment

The health risk assessment documentation does not provide sufficient information to evaluate the health risk assessment (HRA) analysis and results. The documentation should allow the public to recreate the health risk assessment and include references. Specific issues and concerns relative to the HRA are identified in the following comments

E4

4. Table 1 Basis of Emission Calculation EDCO Recycling and Transfer Station Project in Appendix D presents DPM emission rates and stack parameters. However, no documentation on the sources of the information or the calculations is provided.

   The total current DPM emission rate is presented as 0.12 ton per year, 0.028 pound per hour and 7.75E-6 grams per second. The 0.028 pound per hour can be estimated from 0.12 ton per year using 365 days per year and 24 hours per day. However, it is not clear how 7.75E-6 grams per second were derived from 0.028 pound per hour. From simple conversion of units, 0.028 lb/hr should be 0.035 gram per second (0.028 lb/hr x 453.59 grams per pound x hour per 3,600 seconds).

   The equations used to estimate emission should be presented in the Final EIR. The gram per second emission rate should be verified and corrected if needed in the Final EIR.

E5

5. Appendix D states, "For the current analysis, we assumed that actual diesel particulate emission emissions would remain the same for the next 70 years. In reality, these emissions would be 80 percent to 90 percent lower than current emissions due to current state regulations that require 75 percent reduction in diesel exhaust emissions over the next 10 years." An 80 percent reduction was used to estimate future reductions. It is not clear which regulations are referenced by theses statements. The specific regulations should be documented and time lines should be presented. Emission factors should be developed from a weighted average of fleet year EMFAC2007 emission factors with emission reductions occurring during the correct fleet years. It is likely that an 80 percent reduction for future years may not provide a sufficiently conservative analysis. The Final EIR should demonstrate that the emission rates are conservative (i.e., at least as conservative as using fleet year weighted average EMFAC2007 emission factors).

E6

6. The emissions presented in Table 1 Basis of Emission Calculation EDCO Recycling and Transfer Station Project in Appendix D do not match the emissions presented in Table 1-7 Summary of Daily and Annual Operational Emissions in the main text of Appendix D. Table 1 presents the DPM emission rate to be 0.12 tons per year. Table 1-7 presents idling emission rates to be 0.010 ton per year and on-site equipment 0.852 ton per year. The emissions rates in the Final EIR should be consistent. If these emissions rates are correct, an explanation should be included to explain why these emissions are not consistent.

   It is not clear if the HRA includes all diesel emissions from the proposed project or only the diesel idling from trucks.

E7

7. The calms routine was used in the air dispersion modeling. SCAQMD policy regarding use of meteorological data requires that the calms routine not be used. Since SCAQMD Long Beach meteorological data were used, the calms routine should be turned off in the Final EIR.

E8a

8. Figure 3.5-1 in the Draft EIR presents a carcinogenic health risk of 0.48291 in one million. The output file in Appendix D presents a DPM concentration of 0.48291 microgram per cubic meter. No health risk calculation is presented. It appears that the maximum

concentration is of 0.48291 microgram per cubic meter and that it is misreported as the cancer risk in Figure 3.5-1.

DPM concentration in microgram per cubic meter is converted to carcinogenic health risk using the following equation.

$$\textbf{Cancer risk} = \textbf{Cancer Potency (CP)} \cdot \textbf{Inhalation Dose (Dose-Inh)}$$

$$\textbf{Dose-Inh} = 10^{-6} \cdot C_{air} \cdot \textbf{DBR} \cdot (\textbf{EF} \cdot \textbf{ED})/\textbf{AT}$$

Where,

CP	=	Cancer potency; the cancer potency for DPM is 1.1 cancers/mg/kg-day;
Dose-inh	=	Dose through inhalation (mg/kg-day);
10^{-6}	=	Unit conversion factor;
C_{air}	=	Model-estimated DPM concentration ($\mu g/m^3$);
DBR	=	Daily breathing rate (L/kg-day);
EF	=	Exposure frequency (days/year);
ED	=	Exposure duration (years); and
AT	=	Averaging time period over which exposure is averaged, in days.

E8a

Assumptions for the above parameters are given in the table below:

Receptor	DBR	EF	ED	AT
Residential	302*	350	70	25,550
Worker	149	245	40	25,550

* 80th percentile breathing rate per ARB's interim risk management guidance for inhalation risk at residential receptors.[12]

The maximum individual cancer risk (MICR) and maximum exposed individual worker (MEIW) should be identified on Figure 3.5-1. The actual calculation used should be presented along with all parameters used (e.g., modeled concentration, daily breathing rate, cancer potency factor, etc.).

E8b

Page 3.5-14 states that the nearest homes are located 500 feet to the south of the proposed project, then states health risk for the nearest residents. On page 3.5-8, the lead agency states that the nearest receptors are 275 feet west of the proposed project. According to the wind rose for the Long Beach meteorological data (also evident from isopleths Figure 3.5-1.), the prevailing wind direction blows from the southwest to the northwest. Therefore, it is not clear from the Draft EIR where the nearest sensitive receptor is located and whether the nearest residential receptors are included within the MICR isopleth or are only the closest residential/sensitive receptors. The Draft EIR should clearly present the residential/sensitive receptor with the highest health risk.

SCAQMD Permitting and Compliance

E9

9. In the conceptual drawings in Figures 2-4 through 2-8 on pages 2-7 though 2-9, the location, number, configuration, and height of the exhaust stacks from the described ventilation and filtration system are not detailed in the drawings and should be included in the Final EIR.

E10

10. On page 3.5-7, the lead agency should cite in the Final EIR how the lead agency will comply with the following SCAQMD rules and regulation:

- Rules 201 – Permit to Construct;
- Rule 203 – Permit to Operate;
- Regulation XIII – New Source Review; and
- Rule 1401 – New Source Review of Toxic Air Contaminants.

E11

11. The Draft EIR does not mention the potential use of a backup engine generator for the electricity generation in case of an outage; which is typically part of a facility's installed equipment. If such a generator is planned and will be greater than 50 brake HP, that information should be included in the Final EIR and that equipment shall be installed and operated in accordance with applicable SCAQMD rules.

(Page intentionally blank)

Response to Comment Document E

South Coast Air Quality Management District (SCAQMD)
December 24, 2008

Response No. E1

The comparison of construction emissions with both local and regional thresholds are shown below. The results show that construction-related emissions would not exceed local or regional thresholds of significance.

Pollutant	2009 Construction Emissions *(lbs/day)*	Local Threshold of Significance *(lbs/day)*	Regional Threshold of Significance *(lbs/day)*
NOx	17.5	101	100
CO	16.5	1,180	550
PM-10	0.98 *(unmitigated)*	29	150
PM-2.5	0.91 *(unmitigated)*	18	55
SO_2	0.02	No Threshold	150
VOC	2.11	No Threshold	75

Response No. E2

Table 3.5-5 lists the 2009 daily unmitigated construction emissions as tabulated in the "Summary Report" on Page 1 of the URBEMIS2007 output. The emissions for 2008 are listed below.

A 75 percent level of dust control is assumed for fugitive dust emissions. For example, unmitigated PM-10 emissions are predicted to be 18.62 lbs/day. Of this amount, 17.21 lbs/day are fugitive dust and the remaining 1.41 lbs/day are from equipment exhaust. Assuming 75 percent control of 17.21 lbs/day yields 4.30 (fugitive dust) + 1.41 (equipment exhaust) = 5.71 lbs/day (total PM-10).

Pollutant	2008 Construction Emissions *(lbs/day)*	Local Threshold of Significance *(lbs/day)*	Regional Threshold of Significance *(lbs/day)*
NOx	28.07	101	100
CO	17.45	1,180	550
PM-10	18.62 *(unmitigated)* *5.71 (mitigated)*	29	150
PM-2.5	4.9 *(unmitigated)* *2.20 (mitigated)*	18	55
SO_2	0.02	No Threshold	150
VOC	3.35	No Threshold	75

Response No. E3

The most appropriate threshold that applies to the Proposed Project is the localized threshold of significance (LST). The use of LST methodology is voluntary and can be implemented by the local public agency pursuant to CEQA. 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. The LSTs are listed in terms of allowable NO_x, CO, PM_{10} and $PM_{2.5}$ daily emission rates and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

Regional air quality depends on the actual amounts of air pollutants injected into the airshed. This should not be a matter of District policy. As a result, local rather than regional thresholds should apply to this project. The LST methodology is designed for projects that are less than 5 acres and projects that are not expected to create a regional impact. The LST methodology excludes emissions from mobile sources because the majority of mobile emissions would not occur at the Proposed Project Site. Therefore, emissions that occur off-site were not included as part of the local impact analysis. However, emissions from mobile sources that would occur on-site (i.e., truck idling) were included as part of the daily emissions and were compared with the appropriate LST value.

Construction and operation of the facility would release emissions at the Proposed Project Site where currently there are no emissions from waste handling or transport. Consequently, the Proposed Project would have a direct increase in local emissions.

Using regional threshold limits versus LSTs would be appropriate if the no-project alternative would lead to no (zero) emissions. However, this is not the case. If the Proposed Project is not constructed, the 1,500 tons of waste and recyclable material would be processed at other facilities, assuming there is available capacity to handle additional materials. Since LST methodology is appropriate to the Proposed Project, regional threshold limits for NO_x emissions are not applicable. Table 3.5-8 (Summary of Daily and Annual Operational Emissions) is reflective of LST methodology and not regional threshold limits.

Currently, the existing waste and recyclables generated in the Long Beach are being processed at existing transfer stations. These transfer stations include Bell Art (Long Beach), Falcon (Wilmington) and CR (Stanton). In some cases, waste material is taken directly to the Puente Hills landfill.

The Proposed Project estimates that haulers would save 14 miles for each round trip, when they use the Proposed Project Site instead of the existing facilities. Based on the traffic study, it is estimated that 342 collection trucks and 600 self-haul vehicles would use the proposed facility. This translates into a savings of (342 + 600) x 14 miles per round trip = 13,188 miles per day. After subtracting 2,000 miles that would be generated by employee vehicles for the Proposed Project, the net vehicle miles traveled saved is estimated at 11,188 miles per day.

Emissions associated with transferring the waste to other facilities would occur regionally. Such emissions would most likely be greater than emissions at the Signal Hill facility for two reasons:

1) The proposed facility is a modern, state-of-the-art facility employing the newest equipment. Other existing facilities are likely to be older and therefore would release greater levels of emissions.

2) Diverting the waste and recyclable materials to other locations would likely require additional truck travel. If no additional capacity is available at other facilities, waste trucks would travel directly to the landfill leading to a significant increase in vehicle miles. Either possibility

would lead to excess emissions beyond those that would occur at the Proposed Project Site. The key issue is that 1,500 tons of waste and recyclable materials are not created as a result of the Proposed Project. The need for handling this material arises from increasing population in the region. The amount of waste will continue to grow in response to increasing population and from demand from the public for waste removal and recycling.

Response No. E4

Comment noted. Table 1 has been replaced in Technical Appendix D of the *Air Quality Impact Analysis*. A copy of the revised table is provided below.

Table 1
Basis of Emission Calculations
EDCO Recycling and Transfer Station Project

Modeling Inputs			
Release Height (Building Hgt − 1 ft)	23	*ft*	
Ds	4	*ft*	
Stack Area	12.6	*ft2*	
Exit Velocity	1,911	*ft/min*	
	32	*ft/sec*	
Temperature	80	*F*	
Total (Current) DPM Emission Rate	0.13	*tons/year*	
	0.030	*lbs/hr*	
	3.80E-03	*gram/sec*	
Emissions/Stack (Current Emissions)	4.75E-04	*gram/sec*	
Future Reductions	80%		
Emissions/Stack (Future Emissions)	9.49E-05	*gram/sec*	
Unit Risk Factor	3.00E-04		
Input to ISCST (Results in Risk/Million)	2.85E-02	*gram/sec*	Assumes Future Emissions Reductions
Input to ISCST (PER STACK) for 8 Stacks	3.56E-03	*gram/sec*	Assumes Future Emissions Reductions
Input to ISCST (Results in Risk/Million)	1.14E−00	*gram/sec*	Assumes Current Emissions for next 70 yrs
Input to ISCST (PER STACK) for 8 Stacks	1.42E-01	gram/sec	Assumes Current Emissions for next 70 yrs

Response No. E5

The averaging time applicable to determining residential cancer risk is 70 years of continuous exposure. One key input to the risk calculation is the average annual concentration of diesel particulate matter (DPM) in the vicinity of the emission sources. In turn, the average annual concentration of DPM depends on the average annual emission rate over the 70-year period.

For the current project, the main source of DPM is off-road diesel-fueled equipment such as a wood grinder, skid steers, and front-end loaders. As shown in Table 5 of Technical Appendix D to the *Air Quality Impact Analysis,* DPM from such equipment accounts for 96 percent of all diesel PM (0.156 lbs/hr of the total 0.16 lbs/hr). In-use off-road diesel vehicle emissions must be reduced as per CARB regulations and timelines summarized in the following document:

http://www.arb.ca.gov/msprog/ordiesel/documents/OffRoad_06-1215_Full.pdf

According to this regulation, all off-road equipment must be retrofitted with diesel particulate filters or meet Tier 4 emission limits by 2020. The DPM emission rates used in the risk analysis ranged between 0.45 to 0.5 grams/hp-hr (*Air Quality Impact Analysis,* Technical Appendix A, Table 5). This corresponds to Tier 3 engines. By 2020, Final Tier 4 emissions limits will reduce DPM emissions to 0.02 grams/hp-hr. This represents a 90+ percent decrease in DPM in seven years (between 2008 and 2015) over the emission rates used in the risk analysis. As a result, it is reasonable to expect that DPM emissions will decline by at least 75 percent over the next 70 years.

It is also reasonable to expect that DPM will continue to decline beyond 2020. This information was included in the Technical Appendix B (Off-Road Compression Engine Standards for NO_x, CO, PM) of the Air Quality Impact Analysis. Table 1 of Technical Appendix B tabulates current and future off-road emission limits for DPM from 1995 to 2015.

Finally, if future decline in DPM is not included in the analysis, the results would substantially overstate the emissions and health risks associated with the proposed facility. This would mischaracterize the risk associated with the operation of the proposed facility.

Response No. E6

The emission rate of 0.12 tons/yr presented in Table 1 of Technical Appendix D to the *Air Quality Impact Analysis* refers to emissions of on-site equipment and trucks idling while at the facility. Idling trucks account for 0.0069 tons/yr (Table 6 of Technical Appendix A). The remaining emissions (0.122 tons/yr) are from on-site equipment such as grinder, skid steers and front- end loaders (Table 5 of Technical Appendix A). These emissions were used in the risk analysis.

The emission rate of 0.852 tons/yr of DPM noted in the comment (and shown in Table 6 of Technical Appendix A) included on-site emissions from truck idling and off-site emissions from mobile sources such as haul trucks and employee vehicles. The risk analysis was limited to on-site emissions only. Therefore, the appropriate emission rate for risk analysis is 0.12 tons/yr, as revised in Response No. E4.

Response No. E7

Comment noted. The ISCST3 model will be re-run without calm processing. Initial results show that eliminating the calm winds processing routine reduces the concentration of DPM by 1.4 percent. This translates into reducing the calculated risk by 1.4 percent.

Response No. E8

a) Conversion of $\mu g/m^3$ to residential cancer risk

The 0.4891 maximum cancer risk was calculated by inputting (to ISCST3) the product of the emission rate of DPM (in gram/sec) and the unit risk factor for DPM (3.0×10^{-4} cancers/μg per cubic meter), as noted at the bottom of Table 1 "Input to ISCST3 (Results in Risk/million)" in Response No. E4. Therefore, the ISCST3 model output is in terms of lifetime cancer risk for adults instead of concentration even though the model attaches the units of "μg/cubic meter" label in the model output.

For adult residents, the above procedure is functionally equivalent to multiplying the annual concentration by the cancer potency by the inhalation dosage as noted in the comment. The analysis employed a unit risk factor of 3.0×10^{-4} cancers per μg/cubic meter taken from the June 28, 2008 "Consolidated Table of OEHHA/CARB Approved Risk Assessment Health Values". This factor includes

the cancer potency, daily breathing rate, exposure frequency, exposure duration and the averaging time of 70 years. A copy of this table can be found at the following location:

http://www.arb.ca.gov/toxics/healthval/contable.pdf

A separate calculation of risk to workers was not prepared given the low level of risk associated with the facility. The risk to workers would be approximately 20 percent or one-fifth the risk to residents. This calculation will be included in the Final EIR.

b) Location of nearest homes and sensitive receptors

The location of the nearest residences and sensitive receptors were not labeled in Figure 3.5-1. This figure will be revised and the location of nearest residences and sensitive receptors (i.e., schools, hospitals) will be clearly identified. Revised specific distances are listed below. The Final EIR will reflect the revised distances and cancer risk calculations. The changes in distance to the nearest sensitive receptors do not change the initial conclusions that cancer risk to sensitive receptors remains below the threshold of one in 10 million.

The nearest work facility is a warehouse on Atlantic Avenue between East 28th Street and East Patterson Street. The distance from the project property line to the warehouse parking lot is approximately 162 feet. This distance and revised HRA calculation will be included in Final EIR.

The nearest hospital is Long Beach Memorial Medical Center located on Long Beach Boulevard between East Patterson Street and East Columbia Street. The distance from the project property line is approximately 920 feet. This distance and revised HRA calculation will be included in the Final EIR.

The nearest school is Jackie Robinson Academy on Pine Avenue located 3,000 feet west of the project property line. This distance and revised HRA calculation will be included in the Final EIR.

The nearest residences are located on the west side of Lime Street between East 27th Street and Walton Avenue, southwest of the project property line. The distance from the project property line is approximately 625 feet. This distance and revised HRA calculation will be included in the Final EIR.

Response No. E9

The Local Enforcement Agency (LEA) for the Proposed Project will be enforcing both SCAQMD and California solid waste regulations. A copy of the final conceptual drawings, including the height of the exhaust stacks for the ventilation and filtration system, will be submitted to the LEA as part of the odor management plan. The LEA will provide a copy to SCAQMD for review.

Response No. E10

Comment noted. These rules are included in Section 3.5, Air Quality of the Final EIR.

Response No. E11

No back-up generator is planned for the facility. In the event a backup generator is installed, the unit will comply with SCAQMD permitting requirements and a permit will be secured prior to its usage.

(Page intentionally blank)

Comment Document F

COUNTY OF LOS ANGELES
Public Health

JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JONATHAN E. FREEDMAN
Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

ALFONSO MEDINA, REHS
Director of Environmental Protection Bureau

Solid Waste Program
Kenneth Murray, REHS
Chief Environmental Health Specialist
5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5540 • FAX (626) 813-4838

www.publichealth.lacounty.gov

January 22, 2009

Mr. Gary Jones, Director of Community Development
City of Signal Hill Redevelopment Agency
2175 Cherry Avenue
Signal Hill CA 92395-5850

Dear Mr. Jones,

Re: SCH No. 2008081009 – Draft Environmental Impact Report (DEIR) for the Construction and Operation of the EDCO Recycling and Transfer Facility in the City of Signal Hill, Los Angeles County [No SWIS Number Assigned]

Thank you for extending the comment period to January 9, 2009 to provide this office with an opportunity to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

The Program staff has reviewed the DEIR and offer the following comments. As the Local Enforcement Agency (LEA) for the California Integrated Waste Management Board (CIWMB), and to facilitate our review of the operational documents and the permit application, we request a specific response to each of our comments.

F1

1. Project Description
   a) Hours of Operation. Please provide a separate listing for the hours that the facility intends to receive waste and the hours the facility will be handling/processing waste. Please list the hours that the scale house will be open to weigh vehicles.
   b) The only restrooms described are in an area called 'employee area/control area.' Will these restroom facilities be accessible to the drivers? If not, where will the drivers' restrooms be located?
   c) There is no area indicated for truck clean-out. Where will the trucks be repositioned so they can be cleaned by their swampers before leaving to continue their routes?
   d) There is a listing of possible site improvements (page 2-5), but not all of these areas are marked on the site map. Please provide tentative locations for such things as the 'fueling operations' and the 'truck wash' mentioned in the text. When would these decisions be made? Would they be subject to a new, separate CEQA process?

F1

e) There is a list of intended transportation corridors to be swept of litter. It might be prudent to require that additional roadways may need to be swept based on actual operational conditions.
f) If skylights are to be used as a source of illumination for the interior operations, then a cleaning and maintenance protocol should be in place to insure safe visibility.
g) Under public agency approvals, the County of Los Angeles, Public Health Department is listed as the entity to amend the Solid Waste Management Plan. The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force is the correct agency for this approval.
h) All actions listed under CIWMB should first be assigned to the County of Los Angeles Department of Public Health, acting as LEA. After review, approvals, and the issuance of the Solid Waste Facility Permit (SWFP) by the LEA, all these documents are then forwarded to Sacramento for CIWMB review and consideration for concurrence. There are a number of functions reserved to CIWMB including engineering reviews, documentation of financial assurances, and oversight of the origination documentation. In reality, both entities work on the whole package simultaneously to facilitate the best service and quickest approvals possible. However, the process starts with the LEA and the LEA will provide the month-to-month inspections of the facility.

F2

2. Traffic and Circulation
Please include a discussion of the hours that the trash will be received by truck type. From Table 3.3-4, it appears that route trucks will be at the location from 4:00 a.m. to 7:00 p.m. and that self-haul vehicles would be allowed to dump between 6:00 a. m. and 5:00 p.m. How will the self-haul vehicles be held out while the route trucks are coming in? Transfer trucks are listed as utilizing the site from 3:00 a.m. to 7:00 p.m. If staff vehicles have all left by 4:00 p.m., and loading operations are expected to continue 24-hours a day, it appears that there will not be any oversight by facility staff for the loading/unloading, weighing or load checking activities.

F3

3. Noise
a) There was no discussion of the impact of the noise sources on those inside the building.
b) In Section 3.4.6 Cumulative Impacts there is the statement: "Since off-site traffic noise impacts are less than significant, the project will contribute to a cumulatively considerable noise increase." This may need to be changed, and if not, perhaps explained more thoroughly.

F4

4. Air Quality
a) In Table 3.5-6 there is a statement that soil-disturbing activities would be halted if the wind speed exceeds 25 mph. How will this wind speed be known?
b) On page 3.5-11, under Material Transport to and from Facility, it is stated that all trucks will comply with (South Coast Air Quality Management District (SCAQMD) and California Air Resources Board (CARB) fleet rules. This statement implied that even the self-haul trucks are included in the assertions of this sentence. How will the operator enforce these rules on self-haul vehicles?
c) With regard to emissions, there are statements that the project would save emissions by not having route trucks drive as far. Later in this section, it states that "...the Proposed Project would relocate emissions from other locations to the Project Site." For criteria pollutants, greenhouse gases, and odors there is no clear discussion of the local impacts of these relocated emissions.
d) Odor control. An inbound air fan will pull air into the building at a face velocity of 200 feet per minute. Although a misting system will be installed, the exhaust air will only be filtered for dust before it is released through roof vents. What other odor control protocols will the operator have if odors are still present?
e) Under Best Management Practices (BMPs), it states that "The tipping floors would be washed and cleaned as required to remove any build-up or waste residue." We would recommend that a minimum frequency be added to this BMP (such as "at least weekly" or "every other day").
f) In the plume study conducted for diesel emissions under the toxic air pollutants section, a prevailing wind blowing toward the northeast was used. However, Long Beach (and by inclusion, Signal Hill) has a variable wind direction that fluctuates on a daily basis. The winds change direction each evening. The operator has stated that trash handling could take place 24-hours a day, seven days a week. The wind will not always be blowing away from the residential areas to the south of the Project Site. Perhaps a study based on a 24-hour wind rose might be more reflective of the potential impacts.

F4

g) On page 3.5-12, under Material Handling and Sorting, it states, "MSW would be sorted manually and then mechanically once sorting equipment is installed." Is it the intent of the operator to not have the sorting equipment installed before beginning operations? If so, when will the equipment be installed? Perhaps a ramping of allowable tonnages would be in order for a manual-only sorting regime as opposed to a manual-and-mechanical sorting regime.

F5

5. Hazards & Hazardous Materials

a) In 3.6.3.1, it states that the facility will not use, transport, nor dispose of hazardous materials. However, in the load check sections, it is clear that hazardous materials will be sorted out of the trash, temporarily stored, and properly transported off the site. This should be accounted for in this section as well. Every well-implemented load check program finds hazardous wastes that were thrown out with the regular trash.

b) There is a mitigation measure that proposes to measure for methane gas within 30 days of the end of grading work. The workers doing the grading might benefit from ongoing monitoring while they are exposing the soil/materials that may be generating the methane.

c) A copy of any Emergency Response Preparedness Plan for the Proposed Project should also be submitted for review to the LEA.

d) There was no response to the Department of Toxic Substance Control (DTSC) comment asking that a program be prepared that identifies the regulatory agency that will provide oversight for investigation and remediation if the proposed project site were to become hazardous in the future.

F6

6. Biological Resources

Mitigation MM3.8-1 recommends that a qualified biologist conduct a nest survey if construction work will need to be conducted during nesting/fledging season. Recommendations that cost money and slow construction are not usually undertaken. If this mitigation is to protect the wildlife it purports to, the recommendations should be requirements.

Thank you again for the opportunity to review and comment on this DEIR and we hope this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process. The LEA requests copies of any subsequent environmental documents including the Final Environmental Impact Report, the Transfer/Processing Report, any Statements of Overriding Consideration, copies of public notices, and any Notices of Determination for this project.

Please notify this office, at least ten days in advance, of the time and place that this document will be certified. If you have any questions, please feel free to contact me or Gerry Villalobos of my staff at (626) 430-5540.

Sincerely,

Gerry Villalobos for KENNETH MURRAY

Kenneth Murray, Chief
Solid Waste Management/LEA
Los Angeles County Public Health

KM:cu

CC: Gerry Villalobos, Permitting Supervisor
Steve South, EDCO
Ray Seamans, CIWMB CEQA Section
File

(Page intentionally blank)

Response to Comment Document F

County of Los Angeles Department of Public Health, Solid Waste Management Program
January 8, 2009

Response No. F1(a)

The Operations Schedule described in Section ES.2.3 of the Draft EIR describes that as waste volumes dictate, EDCO anticipates that the Facility may be open up to seven (7) days a week up to 24 hours per day. This ability includes all operations, with the exception of public self-haul, which will be restricted to maximum acceptance hours of 5:00 a.m. to 10:00 p.m. up to seven days per week.

Other functions permitted up to 24 hours per day up to seven days a week include receiving and permitted hauler waste, waste processing, waste loadout, facility maintenance, and operations maintenance.

From an operational standpoint, posted hours may be fewer and will be identified in the Transfer and Processing Report (TPR) as a component of the Solid Waste Facility Permit (SWFP) as issued by the Local Enforcement Agency (LEA). Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F1(b)

The restroom facilities identified in the 'employee area/control area' will be accessible to the drivers.

Response No. F1(c)

An area will be designated for truck clean-out inside the facility and will be detailed in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F1(d)

The truck wash has been identified immediately north of the Office & Employee Area and the fueling operation location has not yet been identified. These decisions will be made as operating conditions dictate. Fueling operations will require approval from the Los Angeles County Fire Department, but will not be subject to additional CEQA review.

Response No. F1(e)

Additional cleaning will be described in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F1(f)

Additional cleaning will be described in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F1(g)

Table 2-1 (*Public Agency Approvals*) in the Draft EIR has been revised to indicate that the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force is the correct agency to amend the Solid Waste Management Plan.

Response No. F1(h)

Table 2-1 (*Public Agency Approvals*) in the Draft EIR has been annotated to indicate that the actions listed under CIWMB are first assigned to the County of Los Angeles Department of Public Health, acting as LEA, and that CIWMB review and concurrence will occur following issuance of the SWFP by the LEA.

Response No. F2

Self-haul vehicles will dump at the same time as route trucks, and the TPR will designate different tipping locations within the facility.

Total vehicle counts describe maximum projected impacts during peak daylight hours. Staff will be on-site at all times during loading and unloading and additional operational details will be described in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F3(a)

As part of the TPR, the EDCO Director of Safety will conduct ongoing industrial hygiene reviews to ensure noise levels are consistent with OSHA standards. Additional operational details will be described in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F3(b)

The referenced statement in Section 3.4.6 of the Draft EIR has been corrected as follows: *"Since off-site traffic noise impacts are less than significant, the project will not contribute to a cumulatively considerable noise increase."* (underline indicates added text)

Response No. F4(a)

Measuring the wind speed will be mechanically performed as a condition of the applicant and their respective grading and excavation contractors. The facility will be equipped with a portable wind anemometer. In addition, the construction manager will be checking the weather forecasts to ensure that winds would not exceed 25 mph.

Response No. F4(b)

Public self-haul is not a specific component of the CARB and SCAQMD fleet rules. However, self-haul trucks that have gross vehicle weight above 14,000 pounds would most likely be subject to CARB fleet rules. Therefore, they would be subject to enforcement by CARB. Smaller trucks would not be subject to CARB or SCAQMD fleet rules; therefore, no enforcement would be required. Additionally, EDCO will use best efforts to encourage public self-haulers to properly tarp all loads.

Response No. F4(c)

The referenced statement concerning the relocation of emissions was related to regional emissions. The Draft EIR notes that the demand for a new transfer station is driven by an increase in population. If the current facility is not built, the waste would either be transported directly to the landfill or transported to other, more distant transfer stations. The net result of the project is that there would be a regional improvement in air quality due to reduced vehicle miles traveled.

Locally, the project would lead to an increase in emissions and impacts. This is because locating a new transfer station at a location where there is no such facility would lead to an increase (locally) in emissions. As discussed in the DEIR, the increase in emissions is not significant when compared with SCAQMD's local significance thresholds.

Response No. F4(d)

A detailed Odor Impact Minimization Plan will be prepared and submitted in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA. The following two options are examples of odor control protocols that may be used by the operators in the event that any odorous loads are received:

1) Close all doors

2) The facility would have portable spray equipment that can be used to apply concentrated odor neutralizers directly onto waste piles. This will proactively mitigate odors and therefore, reduce odor complaints.

Response No. F4(e)

A minimum frequency for tipping floor cleaning activities and other operational issues will be provided in the detailed Odor Impact Minimization Plan, which will be prepared and submitted in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F4(f)

The comment raises two issues: 1) The use of prevailing winds in determining health impacts associated with diesel particulate; and 2) the short-term variability of local winds.

The analysis of chronic public health impacts (such as cancer risk) requires that the air quality assessment quantify long-term (70 years) exposure and dosage of the toxic air pollutant. This requires that the analysis evaluate annual average wind speeds and directions. This was done in the evaluation of cancer risk to nearby residents and workers.

There are no short-term (acute) health impacts from exposure to diesel particulate. Therefore, short-term variability in wind speed and direction is not applicable to determining possible health impacts from diesel particulate emissions.

Response No. F4(g)

MRF equipment may not be installed prior to beginning operations and may be installed at a future date as operational and economic conditions dictate. The MRF equipment will be in an area that is separate from the tipping areas for waste and will not require an incremental approach to volume

handling. Additional operational details will be described in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F5(a)

The referenced section of the Draft EIR generalizes the project effects in that the project itself will not be a hazardous waste generator. It will, however, accommodate the storage and off-site transport and disposal of hazardous materials inadvertently brought to the proposed facility. The comment correctly states that the facility will have a stringent load check program for the identification and sequestration of hazardous materials during initial screening of incoming loads. Those materials will be recovered, stored and shipped in a manner and protocol further described in the TPR, which is a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F5(b)

As a recommendation in the Phase II Environmental Site Assessment, the methane assessment to be conducted no sooner than 30 days after the completion of rough grading is to comply with the City of Los Angeles Building and Safety Department's methane assessment and mitigation guidelines that the City of Signal Hill follows. The source of methane is the oil field itself. The methane assessment will determine whether the methane detected in shallow and/or deep probes is under pressure, thereby dictating the type of methane mitigation system to be installed underneath the building slab prior to construction of the proposed building.

Volatile organic compound (VOC) monitoring in compliance with the South Coast Air Quality Management District's (SCAQMD) Rule 1166 Site Specific Soil Mitigation Plan will occur during site grading activities. The VOC monitoring will ensure that the health and safety of the workers are protected while exposed to site soils during the grading activities.

Response No. F5(c)

An Emergency Response Preparedness Plan will be submitted for review in the TPR as a component of the SWFP as issued by the LEA. Conditions described in the TPR will be to the satisfaction of the LEA.

Response No. F5(d)

As this Brownfield site is an oil field with three operating pumping units and the historic use of the site was an oil field with nine previously abandoned oil wells located on-site, the constituents of concern include heavy-ends of total petroleum hydrocarbons indicative of crude oil. EDCO is working with the State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) regarding the oil wells and will continue to monitor for volatile organic compounds (VOCs) as required by the Air Quality Management District (AQMD) Rule 1166 Site Specific Mitigation Soils Plan for excavating and grading site soils.

The City of Signal Hill (the City) has entered into a contract with the State of California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) to review assessment and investigation reports, including human health risk assessments (HHRA), as part of the City's ongoing Brownfield redevelopment efforts. EDCO submitted the Phase II Environmental Site Assessment (Phase II ESA) and the HHRA prepared for the site to the City for review and comment. The City forwarded these documents to OEHHA for review. OEHHA reviewed and approved

the HRA in December 2008 (see Attachment A to these responses to comments). EDCO is awaiting certification of the EIR before proceeding with additional environmental work on-site.

Response No. F6

Mitigation Measure 3.8-1 has been revised to ensure mandatory compliance as follows:

Removal of on-site vegetation shall be accomplished in a manner that avoids impacts to any active nests during the breeding season. If the vegetation is entirely removed outside of the nesting season, which is September 1 through February 14, no surveys or monitoring will be required.

If construction activities must occur during the nesting season, the City shall obtain the services of a qualified biologist to conduct a pre-construction nest survey on the Project Site and within a 150-foot buffer area around the Project disturbance footprint to identify any nests that occur there. This survey shall be carried out within one week prior to initiation of grading activities. If bird species protected under the Migratory Bird Treaty Act or California Fish and Game Code Sections 3503 and 3513 are found nesting within 150 feet of the Project disturbance area, a qualified biologist shall monitor the nests daily during all phases of construction to ensure that the Project does not impact the nests. Clearing and grading activities shall not be allowed within 150 feet of active nests. If an active nest is discovered on-site or within 150 feet of the Project disturbance area, then clearing and/or grading activities shall be delayed in areas within 150 feet of nests until it has been determined by a qualified biologist that the chicks have fledged.

(Page intentionally blank)

Attachment A to Response to Comment Document F

Office of Environmental Health Hazard Assessment

Joan E. Denton, Ph.D., Director
Headquarters • 1001 I Street • Sacramento, California 95814
Mailing Address: P.O. Box 4010 • Sacramento, California 95812-4010
Oakland Office • Mailing Address: 1515 Clay Street, 16th Floor • Oakland, California 94612

Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Susan Mearns
Mearns Consulting, Inc
738 Ashland Avenue
Santa Monica, CA 90405

Ken Farfsing
City of Signal Hill
2175 Cherry Avenue
Signal Hill, CA 90755

FROM: Jim Carlisle, DVM, Senior Toxicologist
Integrated Risk Assessment Branch

DATE: December 9, 2008

SUBJECT: HUMAN HEALTH RISK ASSESSMENT FOR 3.287-VACANT LAND LOCATED AT THE CORNER OF PATTERSON STREET AND CALIFORNIA AVENUE, SIGNAL HILL, CA OEHHA # 830046-00

Document Reviewed

I reviewed the Human Health Risk Assessment for 3.287-Vacant Land, Signal Hill, CA by Mearns Consulting, LLC, dated September 29, 2008

Site Characterization

An accurate estimate of risk from contamination at a site requires accurate characterization of contaminant concentrations at the site. Three aspects are key to achieving this:

- Sampling strategy: Sampling locations must represent the site as a whole or at least not avoid significant contamination.
- Sample handling: Samples must be handled in such a way that chemical is not lost before the analysis can take place.
- Sample analysis: Samples of appropriate environmental media must be analyzed for an appropriate suite of chemicals that may be present at the site based on the site history.

My review is based on the assumption that these conditions were met.

Susan Mearns
Ken Farfsing
12/9/2008
Page 2 of 2

Conceptual Site Model

- The assessment assumes industrial and construction scenarios, evaluating the following pathways:
  - indoor exposure to inhaled VOCs (industrial only)
  - outdoor exposure to inhaled VOCs and particles
  - outdoor exposure to soils by ingestion and dermal contact.
- Ecological and residential assessments were not included.
- Ground water was not considered as an exposure medium.

Vapor intrusion results

- Benzene was detected in soil vapor at a concentration less than the commercial/industrial CHHSL. Thus, there is no significant risk from inhalation of indoor vapors

Soils exposure results

- Page 17 does not appear to include exposure parameters for construction workers.
- The "Estimated Risks and Hazards" table does not identify the scenario being evaluated.
- The "Notes" below the "Estimated Risks and Hazards" table refer to DTSC (1999) fig 5 and 7 and equation 2.8. Since the DTSC equations were not used exactly as presented in fig 5 and 7 (DTSC, 1999), this could be confusing to a reader who did not carefully read sections 7.1 and 7.2. A more accurate reference would be to sections 7.1 and 7.2.
- My calculations indicated a risk of 2.5×10^{-5} for current/future onsite outdoor workers, slightly lower than the 3.3×10^{-5} value in the report. This risk is primarily due to exposure to arsenic. However, actual risk is probably lower, since the highest arsenic levels are at 20-25 feet depth where exposure to these workers is unlikely.
- My calculations indicated a lower risk of 3.7×10^{-6} for current/future onsite construction workers.
- It is possible that arsenic concentrations are equivalent to local background levels.

Conclusions

- Risks due to benzene infiltration into indoor air are less than significant.
- Risks and hazards due to other VOCs and metals other than arsenic are less than significant.
- Only arsenic is a significant contributor to cancer risk at this site.
- Upper-bound risk estimates are about 3×10^{-5} for outdoor transfer station workers. Actual risks for these workers are probably lower, since the highest arsenic levels are at 20-25 feet depth where exposure is unlikely.
- The upper-bound lifetime cancer risk to current/future onsite construction workers is estimated at 3.7×10^{-6}.
- As stated in the report, the upper-bound lifetime cancer risks due to arsenic in soils are within U.S. EPA's "safe and protective of public health" risk management range of 10^{-6} to 10^{-4}.

If you have any questions, call me at 916-323-2635 or e-mail JCarlisle@OEHHA.CA.GOV.

Reviewed by:
Hristo Hristov, MD, PhD

PART 3

Draft EIR Errata and Modifications

Modifications to the Draft EIR text are depicted as follows:

Black underline indicates text additions

~~Gray strikethrough~~ indicates text deletions

TABLE ES-1
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Potential Impacts	Mitigation Measures	Level of Significance After Mitigation
3.6 Hazards and Hazardous Materials		
Impact 3.6-1: The Proposed Project would 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, could create a significant hazard to the public or the environment.	**MM 3.6-1:** A soil management plan shall be prepared to provide guidance to building contractors in the event discolored or odiferous soils are discovered during onsite excavation and grading activities	Less than significant with mitigation incorporated and no cumulative impacts.
Impact 3.6-2: Three unknown oil wells (Damron 4, RC-6, and RC-5) have not been located at the Proposed Project Site.	**MM 3.6-2a:** If any previously unknown wells or pipelines are encountered at any time during grading activities, all work shall immediately cease until clearance is received from the City of Signal Hill. **MM 3.6-2b:** Records of wells previously abandoned in accordance with State of California, DOGGR regulations shall be reviewed in order to determine if they comply with current abandonment regulations. Any such wells shall be re-abandoned in conformance with current DOGGR regulations.	Less than significant with mitigation incorporated and no cumulative impacts.
Impact 3.6-3: Rough grading activities associated with the Proposed Project have the potential to release methane gas.	**MM 3.6-3:** A methane assessment shall be conducted on-site within 30 days of completion of rough grading to determine if methane concentrations warrant mitigation (i.e., installation of a vapor barrier and modified active vapor collection/diffusion system during construction~~passive vapor~~).	Less than significant with mitigation incorporated and no cumulative impacts.
Impact 3.6-4: Since 1923, the Proposed Project Site has been associated with oil field activities, including oil derricks, a tank farm, and wells.	**MM 3.6-4:** Should any previously unknown underground storage tanks be discovered during the Project Site preparation phase, removal of these tanks would require a plan check and compliance with closure conditions from the County of Los Angeles Department of Public Works, Environmental Programs Division pursuant to Los Angeles County Code, Title 11, Division 4 and California Code of Regulations, Title 23, Division 3, Chapter 16.	Less than significant with mitigation incorporated and no cumulative impacts.
Impact 3.6-5: Construction activities could disrupt underground utility systems.	**MM 3.6-5:** The Project proponent shall obtain a "Dig Alert" identification number two working days in advance of commencement of excavation activities.	Less than significant with mitigation incorporated and no cumulative impacts.

Potential Impacts	Mitigation Measures	Level of Significance After Mitigation
	3.8 Biological Resources	
Impact 3.8-1: Since marginal foraging, roosting and nesting vegetation habitat exists on and adjacent to the Project Site, the removal of ornamental trees and shrubs has the potential to impact wildlife.	**MM 3.8-1:** Removal of on-site vegetation shall be accomplished in a manner that avoids impacts to any active nests during the breeding season. If the vegetation is entirely removed outside of the nesting season, which is September 1 through February 14, no surveys or monitoring will be required. If construction activities must occur during the nesting season, ~~it is recommended that~~ the City shall obtain the services of a qualified biologist to conduct a pre-construction nest survey on the Project Site and within a 150-foot buffer area around the Project disturbance footprint to identify any nests that occur there. This survey ~~should~~ shall be carried out within one week prior to initiation of grading activities. If bird species protected under the Migratory Bird Treaty Act or California Fish and Game Code Sections 3503 and 3513 are found nesting within 150 feet of the Project disturbance area, ~~it is recommended that~~ a qualified biologist shall monitor the nests daily during all phases of construction to ensure that the Project does not impact the nests. Clearing and grading activities shall not be allowed within 150 feet of active nests. If an active nest is discovered on-site or within 150 feet of the Project disturbance area, then clearing and/or grading activities ~~will~~ shall be delayed in areas within 150 feet of nests until it has been determined by a qualified biologist that the chicks have fledged.	Less than significant with mitigation incorporated and no cumulative impacts.
	3.9 Cultural Resources	
Impact 3.9-1: The Proposed Project could cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5 of the State CEQA Guidelines.	**MM 3.9-1:** Prior to issuance of a grading permit, a qualified archaeologist, experienced with Native Americans and Native American resources will be retained by the City of Signal Hill. The archaeologist shall be present at a pre-grading conference with the contractor and shall establish procedures for archaeological resource surveillance and work stoppage if cultural resources are encountered. Should buried cultural resources be encountered by the contractor during construction activities, work in that area must be halted until the archaeologist is notified and can evaluate the nature and significance of the find and if necessary, coordinate the appropriate efforts for handling and/or disposition of these materials. The City of Signal Hill Community Development Department shall be notified immediately if cultural resources are encountered.	Less than significant with mitigation incorporated and no cumulative impacts.
Impact 3.9-2: The Proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**MM 3.9-2:** Prior to issuance of a grading permit, a qualified paleontologist will be retained by the City of Signal Hill. The paleontologist shall be present at a pre-grading conference with the contractor and shall establish procedures for paleontological resource surveillance and work stoppage if paleontological resources are encountered. Should buried paleontological resources be encountered by the contractor during construction activities, work in that area must be halted until the paleontologist is notified and can evaluate the nature and	Less than significant with mitigation incorporated and no cumulative impacts.

- Disposal of City Refuse – All refuse gathered from City facilities or from City operations may be deposited in the Facility without charge.

2.5 PUBLIC AGENCY APPROVALS

The Project may includes, but is not limited to, the public agency permits and approvals listed below.

TABLE 2-1
PUBLIC AGENCY APPROVALS

Agency	Permit or Approval
City of Signal Hill	Certification of CEQA document
	Zoning Ordinance Amendment amending the General Industrial Specific Plan (SP-19)
	Zoning Ordinance Amendment designating the site SP-19, Planning Area –3, on the Official Zoning Map
	Conditional Use Permit, Site Plan and Design Review
	Lot Merger
	Disposition and Development Agreement
	Vacation of an unimproved alley right-of-way between California and Olive Avenues
	Vacation of Olive Avenue right-of-way between Patterson and 28th Streets
	Grading Permit / Proof of compliance with NPDES requirements (SWPPP and SUSMP)
	Right-of-way encroachment permit
	Amendment to Non Disposal Facility Element
South Coast Air Quality Management District	Authority to Construct Conformance with Rule 410 (Odor Control Plan)
State of California, Department of Conservation, Division of Oil, Gas and Geothermal Resources	Site Plan (approval only related to oil and gas wells)
County of Los Angeles, Fire Protection Services	Plan Check
Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force~~County of Los Angeles, Public Health~~	Amendment to Solid Waste Management Plan
Sanitation Districts of Los Angeles County, Sanitation District No. 5	Permit to Connect (sewer connection fee)
California Integrated Waste Management Board[1]	Permit to Operate Approval of Transfer Processing Report Emergency Response Preparedness Plan Odor Control Plan Vector Control Plan

[1] CIWMB approval actions are first assigned to the County of Los Angeles Department of Public Health, acting as the Local Enforcement Agency (LEA). CIWMB review and concurrence will occur following issuance of the SWFP by the LEA.

(Page intentionally blank)

receptor(s) are within a minimum of 50 to 60 feet. In this instance, however, no vibration-sensitive uses are within a zone of potential impact; therefore, no impacts are expected.

Just as the Project will not create significant vibration impacts, it will not be adversely affected by ongoing oil production facilities. Section 16.20.110 of the Municipal Code requires that vibration from oil production equipment must be kept to a minimum level, and in such cases as it is required, vibration dampening equipment of the best available technology must be installed. Insofar as this requirement is subject to periodic inspection (Ord. 90-08-1074 §4), impacts are expected to remain less than significant.

3.4.4 Potential Impacts and Mitigation Measures

The Project will not result in potentially significant noise impacts. No mitigation measures are required.

3.4.5 Level of Significance After Mitigation

All impacts will be less than significant without the use of mitigation measures. No unavoidable significant impacts would result.

3.4.6 Cumulative Impacts

The analysis of long-term traffic noise impacts relied on year 2010 traffic data that included the Project, background growth, and related projects. Collectively, those data represent cumulative traffic conditions. Since off-site traffic noise impacts are less than significant, the project will not contribute to a cumulatively considerable noise increase.

3.4.7 Public/Agency Comments on Noise Issues

Agencies commenting on NOP noise issues included the California Integrated Waste Management Board (CIWMB) and the City of Long Beach Department of Development Services. These agencies requested that the following noise data and/or concerns be addressed in the Draft EIR:

- CIWMB
  - Describe the design features to attenuate for noise

    Project design features planned to attenuate for noise are discussed in Environmental Control Systems in Chapter 2.0 (Project Description) and in the analysis above.
  - Prepare a noise study addressing short-term, operations-related, and cumulative impacts if local receptors are impacted

    The Noise Impact Analysis prepared for the project is summarized in this section and is included in Appendix C of the Draft EIR.
- City of Long Beach Department of Development Services
  - Analyze truck traffic noise impacts on recreational park uses

    See analysis above.

(Page intentionally blank)

Applicable Rules and Regulations

SCAQMD has adopted several rules and regulations that would be applicable to the Proposed Project. These include:

- District Rule 201 – Permit to Operate: Applies to stationary sources.
- District Rule 203 – Permit to Construct: Applies to stationary sources.
- District Rule 401 – Visible Emissions: Applies to visible emissions for more than three (3) minutes within any given hour from a stationary or mobile source.
- District Rule 402 – Nuisance: Applies to any source operation that emits or may emit air contaminants or other materials. This rule is applicable to the Proposed Project if at any time, the Project creates a public nuisance.
- District Rule 403 – Fugitive Dust: A series of rules designed to reduce PM_{10} emissions (predominantly dust/dirt) generated by human activity, including building and road construction, bulk materials storage, and landfill operations. This rule is applicable to the Proposed Project during the construction phase and during operational activities.
- District Rules 404 and 405 – Particulate Matter Concentration & Weight: Limits the amount of particulate matter that can be discharged into the atmosphere. This rule is applicable to the operational activities at the Transfer Station at the Proposed Project.
- District Rule 407 – Liquid and Gaseous Air Contaminants: Limits the amount of CO and sulfur compounds such as sulfur dioxide (SO_2) that can be discharged into the atmosphere. This rule is applicable to the Proposed Project during the construction phase and during operational activities.
- District Rule 409 – Combustion Contaminants: Limits the amount of CO_2 that can be discharged into the atmosphere. This rule is applicable to the Proposed Project during the construction phase and during operational activities.
- District Rule 410 - Odors from Transfer Stations and Material Recovery Facilities: Establishes odor management practices and requirements to reduce odors from transfer stations and material recovery facilities. This rule is applicable to the Proposed Project.
- District Rule 473 - Disposal of Solid and Liquid Wastes: Requires the burning of waste be incinerated in devices approved by an Air Pollution Control Officer.
- District Rule 1401 – New Source Review of Toxic Air Contaminants: Requires that emissions of toxic air pollutants from stationary sources be evaluated.
- District Regulation IX - Standards of Performance for New Stationary Sources: Requires that all new stationary sources comply with the most stringent standards, criteria, and requirements of the SCAQMD. This regulation is applicable to the operational activities of the Proposed Project
- District Regulation XIII – New Source Review: General permitting requirements for stationary sources.

Localized Significance Thresholds

The SCAQMD has established localized significance thresholds (LSTs) that can be used to assess air quality impacts. 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

The 2003 AQMP sets forth programs that require the cooperation of all levels of government: local, regional, state, and federal. The AQMP represents each level of government by the appropriate agency or jurisdiction that has the authority over specific emissions sources. Accordingly, each agency or jurisdiction is associated with specific planning and implementation responsibilities. The AQMP control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections.

The City of Signal Hill General Plan, Land Use Element designates the Proposed Project Site as General Industrial Land Use. The Proposed Project is consistent with and does not propose or require an amendment to the City's General Plan. Additionally, the Air Quality Analysis was prepared in conformance with SCAQMD guidelines and thresholds. Therefore, implementation of the Proposed Project will not conflict with or result in an obstruction to the 2003 AQMP.

3.5.3.1 Construction Emissions

- *The Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation*

Construction activities associated with the Proposed Project will result in emissions of criteria pollutants. Construction related emissions are expected from the following construction activities:

- Demolition
- Grading
- Paving
- Building Construction
- Construction Workers Commuting

The estimated maximum daily construction emissions are summarized in Table 3.5-5, *Summary of Construction Related Emissions*. Emissions resulting from construction activities form the Proposed Project do not exceed the threshold of significance for any criteria pollutant.

TABLE 3.5-5
SUMMARY OF CONSTRUCTION RELATED EMISSIONS

Pollutant	Construction Emissions	Threshold of Significance	Impact Significant?
	lbs/day	lbs/day	
NO_x	28.07~~17.5~~	101	NO
CO	17.45~~16.5~~	1,180	NO
PM_{10}	18.62 *(unmitigated)*~~0.98~~ 5.71 *(mitigated)*	29	NO
$PM_{2.5}$	4.9 *(unmitigated)*~~0.9 1~~ 2.20 *(mitigated)*	18	NO
SO_2	0.02	No Threshold	N/A
VOC	3.35	No Threshold	N/A

TABLE 3.5-8
SUMMARY OF DAILY AND ANNUAL OPERATIONAL EMISSIONS

	PM_{10}		$PM_{2.5}$		NOx		ROG		CO	
EMISSIONS CATEGORY	*lbs/day*	*tons/yr*	*lbs/day*	*tons/yr*	*lbs/day*	*tons/yr*	*lbs/day*	*tons/yr*	*lbs/day*	*tons/yr*
ON SITE EMISSIONS										
Dust Emissions (From Material Handling)	3	0.57	0.32	0.058	--	--	--	--	--	--
Exhaust Emissions (On-Site Equipment)	0.156	0.852	*Note 1*	*Note 1*	1.78	6.80	~~0.861~~1.305	~~0.119~~0.20	~~12.6~~15.2	~~1.6~~2.1
Truck Idling	0.053	0.010	*Note 1*	*Note 1*	4.95	0.90	0.44	0.081	2.61	0.48
TOTAL ON-SITE EMISSIONS	3.36	1.43	0.32	0.06	6.73	7.70	1.75~~30~~	0.28~~0~~	17.8~~5.2~~	2.56~~08~~
Operational Threshold of Significance	7.00	No Threshold	3.00	No Threshold	99.0	No Threshold	No Threshold	No Threshold	1,100	No Threshold
Impact Significant?	No	--	No	--	No	--	--	--	No	--
OFF-SITE EMISSIONS										
Off-Site Truck Emissions	3.26	0.59	*Note 1*	*Note 1*	308.5	56.1	4.03	0.73	44.9	8.17
Employee Travel	0.0044	0.0008	*Note 1*	*Note 1*	0.432	0.079	0.048	0.009	4.74	0.86
TOTAL OFF-SITE EMISSIONS	3.26	0.59	--	--	308.9	56.2	4.08	0.74	49.7	9.0
Note 1: $PM_{2.5}$ emissions are included in PM_{10}. A separate emission factor for $PM_{2.5}$ is not available										

Material Transport to and from Facility

The principal air pollutants associated with material transport are CO, NO_x and ROG. Transport of recyclable materials to the facility potentially includes refuse, greenwaste and construction debris. These recyclable materials would be transported to the Project Site by heavy-duty diesel fuelled trucks. Transport of refuse, recyclables, and processed greenwaste from the Project Site would also occur by the use of heavy-duty diesel fuelled trucks. Public self-haul would be primarily from light and medium duty trucks. All trucks would comply with SCAQMD and CARB's fleet rules that limit NO_x and PM_{10} emissions.

According to the Traffic Impact Analysis Report,[3] 1,178 vehicles per day would be entering or leaving the Proposed Project Site. This analysis includes 340 collection trucks, 600 self-haul vehicles, and 136 transfer trucks. The remaining vehicles are for employees traveling to and from the Proposed Project Site.

Emissions from trucks are summarized in Table 3.5-8, *Summary of Daily and Annual Emissions Operations*. These emission estimates assume an average trip length between 10 and 50 miles depending on the vehicle and occur off-site of the Proposed Project Site. In accordance with SCAQMD guidance (*Localized Significance Threshold Methodology, July 2008*), off-site emissions are excluded from determining the ~~significant~~ significance of ~~emissions from~~ Project impacts.

[3] Air Permitting Specialists. October 2008. EDCO Transfer Station Air Quality Impact Analysis.

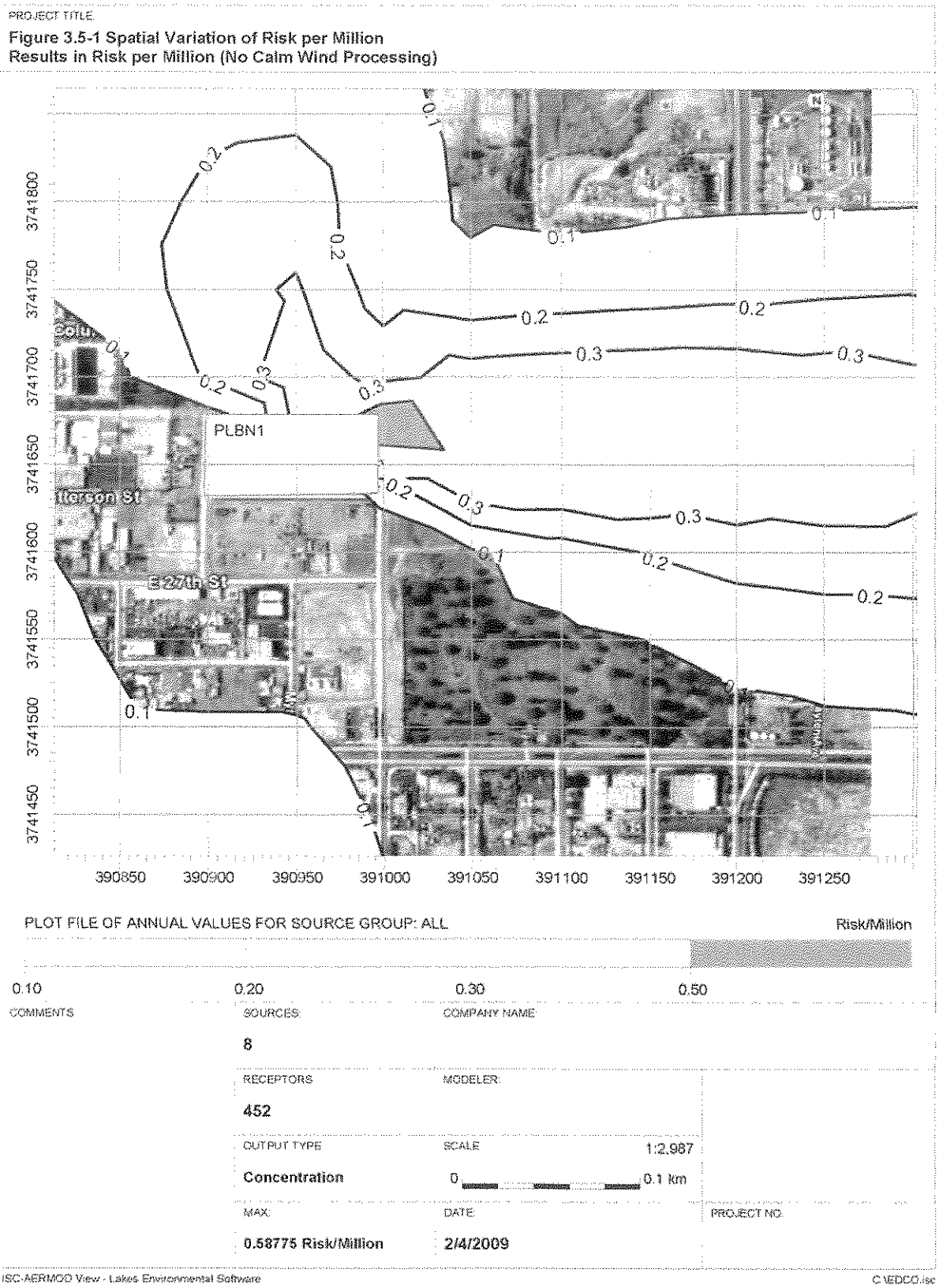
On-site emissions would be localized to the 3.4-acre Project Site. These emissions would be released from equipment such the wood grinder, loaders and skid steers as well as trucks idling on the property. Since these emissions are concentrated in a small area, there is potential for emissions to impact nearby residences and businesses.

To evaluate potential health risks to the community, both cancer risk and non-cancer hazard index were quantified. The emission rates of diesel particulate from on-site equipment and truck idling are summarized in Table 3.5-8, *Summary of Daily and Annual Operational Emissions*. The emissions calculated are current emissions. However, emissions averaged over the next 70 years would be a small fraction of current emissions.

For analysis, an assumption was made that diesel particulate emissions would remain the same for the next 70 years. Per the AQMP, diesel particulate emissions would be 80% to 90% lower than current emissions due to state regulations that require 75% reduction in diesel exhaust emissions over the next 10 years. The majority of the diesel exhaust would ~~occur~~ be released into the Material Recovery Facility (MRF) and transfer station (TS). These emissions would then be released into the atmosphere from vents located at the roof of these buildings.

An air dispersion model was used to calculate the concentration of diesel particulate emissions within 2 kilometers (0.9 mile) of the Proposed Project Site. The concentrations were multiplied by the unit risk factor for diesel particulate to obtain 70-year residential cancer risk. The nearest homes are located 625~~500~~ feet southwest of the Proposed Project Site, on Lime Street ~~South of East Willows Street~~.

Results from the risk analysis indicate that the maximum cancer risk at the nearest residences would be between 0.5 to less than 0.01 cancers per million depending on location. The maximum cancer risk at the nearest business location would be 0.1 cancers per million. The nearest business is located 150 feet west of the MRF. The spatial variation of residential cancer risk near the project site is shown in Figure 3.5-1.



Source: Air Permitting Specialists, 2008

FIGURE 3.5-1
SPATIAL VARIATION OF RESIDENTIAL CANCER RISK

3.5.4 Potential Impacts and Mitigation Measures

Impacts associated with air quality are less than significant. Therefore, no mitigation measures are required.

3.5.5 Level of Significance After Mitigation

Impacts associated with air quality are less than significant. Therefore, no mitigation measures are required.

3.5.6 Cumulative Impacts

The only cumulative impact to air quality from development of the Proposed Project is the potential for GHG emissions. However, because of the AB 32 goal to reduce GHG emissions, if the Proposed Project were not developed, refuse and recyclables would have to be landfilled. This would lead to higher GHG emissions since individual refuse trucks would travel to the landfill. This would increase the total miles traveled and total emissions. Additionally, new emissions would result from landfill of recyclables. The volume of waste generated locally and the demand to dispose of this waste are not driven by the Proposed Project. As a result, the Proposed Project would relocate emissions from other locations to the Project Site. Globally, there would be a reduction in GHG emissions due to decreased miles traveled and less landfill of recyclable materials. Therefore, the Proposed Project reduces cumulative impacts on GHG emissions.

3.5.7 Public/Agency Comments on Air Quality Issues

Commenting agencies on the Notice of Preparation (NOP) for air quality issues included the California Department of Transportation, California Integrated Waste Management Board, City of Long Beach Department of Development Services, Department of Toxic Substance Control, and the South Coast Air Quality Management District. These agencies requested that the following air quality issues and/or concerns be addressed in the Draft EIR:

- California Integrated Waste Management Board
  - Requested the Draft EIR describe features to attenuate for odor and dust

    See analysis above.
  - Requested the facility prepare an Odor Impact Minimization Plan

    The Proposed Project is subject to SCAQMD permit requirements and specifically Rule 410 (Odor Management for MRF/TS). Rule 410 limits the size of building openings and requires the installation of a ventilation system. The Proposed Project would prepare an Odor Management Minimization Plan in accordance with Rule 410 and other applicable SCAQMD guidelines.
  - Requested the Draft EIR be specific regarding the distance to the nearest sensitive receptor(s)

    An air dispersion model was used to calculate the concentration of diesel particulate emissions within 2 kilometers (0.9 mile) of the Proposed Project Site. The nearest homes are located ~~500~~ 625 feet southwest of the Proposed Project Site, on Lime Street~~South of East Willows Street~~. The nearest business is located 150 feet west of the proposed Material Recovery Facility.

See analysis above. An air dispersion model was used to calculate the concentration of diesel particulate emissions within 2 kilometers (0.9 mile) of the Proposed Project Site. The nearest homes are located 625~~500~~ feet southwest of the Proposed Project Site, on Lime Street~~South of East Willows Street~~. The nearest business is located 150 feet west of the Material Recovery Facility.

- A CO Hot Spot Analysis should be performed to determine if any localized concentrations of CO would result from Project implementation.

  See analysis above.

- Potential impacts of odor on schools should be evaluated.

  The Proposed Project is subject to SCAQMD permit requirements and specifically Rule 410 (Odor Management for MRF/TS). Rule 410 limits the size of building openings and requires the installation of a ventilation system. The Proposed Project would prepare an Odor Management Minimization Plan in accordance with Rule 410 and other applicable SCAQMD guidelines.

- City of Long Beach Department of Development Services
  - Requested the Draft EIR include an analysis of the Proposed Project's air quality impacts on active recreational park use

    An air dispersion model was used to calculate the concentration of diesel particulate emissions within 2 kilometers (0.9 mile) of the Proposed Project Site. This distance included all sensitive receptors within 0.9 mile of the Proposed Project Site. Implementation of the Proposed Project does not create any adverse air quality impacts. Air dispersion modeling results are included as Appendix D of the Draft EIR.

  - Requested the Draft EIR provide details regarding the best management practices that will be required as part of the applicant's Odor Management Plan for SCAQMD Rule 410

    The Proposed Project is subject to SCAQMD permit requirements and specifically Rule 410 (Odor Management for MRF/TS). Rule 410 limits the size of building openings and requires the installation of a ventilation system. The Proposed Project would prepare an Odor Management Minimization Plan in accordance with Rule 410 and other applicable SCAQMD guidelines.

Mitigation Monitoring and Reporting Program

EDCO Recycling and Transfer Facility

City of Signal Hill, California
February 2009

TABLE OF CONTENTS

Appendix

1.0 INTRODUCTION

Pursuant to Section 21081.6 of the Public Resources Code and the California Environmental Quality Act (CEQA) Guidelines Section 15074(d), public agencies are required to adopt a monitoring or reporting program to assure that the mitigation measures and revisions identified in the Environmental Impact Report (EIR) are implemented. As stated in Section 21081.6 of the Public Resources Code:

> *"...the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted, or made a condition of project approval, in order to mitigate or avoid significant effects on the environment."*

The EIR prepared for the EDCO Recycling and Transfer Facility project (SCH #2008081009), provided an analysis of the environmental effects resulting from construction and operation of the project. A thorough scientific and engineering evaluation of the project was undertaken in compliance with CEQA, including the identification of measures designed to avoid or substantially reduce the potential adverse effects of the project to below a level of significance.

1.1 Description of Proposed EDCO Recycling and Transfer Facility Project

The proposed project is the development of a ±68,000 square foot recycling and transfer facility on a 3.75-acre site in the City of Signal Hill (City). The state-of-the-art materials recovery/transfer station (MRF/TS) facility will serve as a point to accept, process, recover and transfer mixed municipal waste and residue following diversion activities to an appropriate permitted disposal facility.

Table 1 provides a summary of public agency approvals that may be associated with the Project.

1.2 Mitigation Matrix

In order to sufficiently track and document the status of mitigation measures, a mitigation matrix has been prepared and includes the following components:

- Mitigation measure number
- Mitigation measure (text)
- Implementation Action
- Responsible Monitoring Party
- Monitoring Phase
- Verification/Approval Party
- Mitigation Measure Implemented? (Y/N and date)
- Documentation Location (Monitoring Record)

Mitigation measure timing of verification has been apportioned into several specific timing increments. Of these, the most common are:

- Prior to issuance of grading permit
- Prior to issuance of building permit(s)
- During construction

Table 1
Public Agency Approvals

Agency	Permit or Approval
City of Signal Hill	Certification of CEQA document
	Zoning Ordinance Amendment amending the General Industrial Specific Plan (SP-19)
	Zoning Ordinance Amendment designating the site SP-19, Planning Area -3, on the Official Zoning Map
	Conditional Use Permit, Site Plan and Design Review
	Lot Merger
	Disposition and Development Agreement
	Vacation of an unimproved alley right-of-way between California and Olive Avenues
	Vacation of Olive Avenue right-of-way between Patterson and 28th Streets
	Grading Permit / Proof of compliance with NPDES requirements (SWPPP and SUSMP)
	Right-of-way encroachment permit
	Amendment to Non Disposal Facility Element
South Coast Air Quality Management District	Authority to Construct Conformance with Rule 410 (Odor Control Plan)
State of California, Department of Conservation, Division of Oil, Gas and Geothermal Resources	Site Plan (approval only related to oil and gas wells)
County of Los Angeles, Fire Protection Services	Plan Check
Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force	Amendment to Solid Waste Management Plan
Sanitation Districts of Los Angeles County, Sanitation District No. 5	Permit to Connect (sewer connection fee)
California Integrated Waste Management Board[1]	Permit to Operate Approval of Transfer Processing Report Emergency Response Preparedness Plan Odor Control Plan Vector Control Plan

[1] CIWMB approval actions are first assigned to the County of Los Angeles Department of Public Health, acting as the Local Enforcement Agency (LEA). CIWMB review and concurrence will occur following issuance of the SWFP by the LEA.

1.3 Mitigation Monitoring Procedures

The City of Signal Hill Community Development Department is the designated lead agency for the EDCO Recycling and Transfer Facility project. The City is responsible for review of all monitoring reports, enforcement actions, and document disposition. The City will rely on information provided by the monitors as accurate and up-to-date and will field check mitigation measure status as required.

1.3.1 Coordination with Contractors

The construction manager/superintendent is responsible for coordination of contractors, and is also responsible for contractor completion of required measures in accordance with the provisions of this program.

1.3.2 Recognized Experts

The use of recognized experts as a component of the mitigation monitoring team is required to ensure compliance with scientific and engineering based mitigation measures. While the mitigation monitoring team assesses compliance with required mitigation measures, consultation with the City of Signal Hill planning staff shall take place in the event of a dispute.

1.3.3 Arbitration/Dispute Resolution

If the mitigation monitor has identified an action which, in the opinion of the monitor, has not been implemented or has not been implemented correctly, the problem will be brought to the attention of the City of Signal Hill Community Development Director for resolution. The City will have the authority to issue stop work orders until the dispute is resolved.

1.3.4 Enforcement

Agencies may enforce conditions of approval through their existing police power, using stop work orders, fines, infraction citations, loss of entitlements, refusal to issue building permits or certificates of use and occupancy or, in some cases, notice of violation for tax purposes. Criminal misdemeanor sanctions could be available where the agency has adopted an ordinance requiring compliance with the monitoring program, similar to the provision in many zoning ordinances which affirm the enforcement power to bring suit against violators of the ordinance provisions.

APPENDIX A
Mitigation Monitoring and Reporting Program Checklist

Mitigation Monitoring and Reporting Program Checklist

No.	Mitigation Measure	Implementation Action	Monitoring Party	Monitoring Phase	Verification/ Approval Party	Mitigation Measure Implemented? (Y/N) & Date	Documentation Location (Monitoring Record)
HAZARDS AND HAZARDOUS MATERIALS							
MM-3.6-1	A soil management plan shall be prepared to provide guidance to building contractors in the event discolored or odiferous soils are discovered during onsite excavation and grading activities.	The Applicant's consulting environmental engineer will prepare a soil management plan.	Applicant and contractor(s)	Prior to Grading Permit issuance and during construction	City of Signal Hill Building Department	_____	City of Signal Hill Building Department
MM-3.6-2a	If any previously unknown wells or pipelines are encountered at any time during grading activities, all work shall immediately cease until clearance is received from the City of Signal Hill.	The Applicant's consulting environmental engineer will stop excavation and construction activities if unknown wells or pipelines are discovered.	Applicant and contractor(s)	During Construction	City of Signal Hill Building Department	_____	City of Signal Hill Building Department
MM-3.6-2b	Records of wells previously abandoned in accordance with State of California, DOGGR regulations shall be reviewed in order to determine if they comply with current abandonment regulations. Any such wells shall be re-abandoned in conformance with current DOGGR regulations.	The Applicant's consulting environmental engineer will review records.	Applicant and contractor(s)	Prior to Grading Permit issuance and during construction	California Division of Oil, Gas, and Geothermal Resources City of Signal Hill Building Department	_____	City of Signal Hill Building Department
MM-3.6-3	A methane assessment shall be conducted on-site within 30 days of completion of rough grading to determine if methane concentrations warrant mitigation (i.e., installation of a vapor barrier and passive vapor).	The Applicant's consulting environmental engineer will conduct methane test.	Applicant and contractor(s)	No sooner than 30 days after completion of rough grading	City of Signal Hill Building Department	_____	City of Signal Hill Building Department
MM-3.6-4	Should any previously unknown underground storage tanks be discovered during the Project Site preparation phase, removal of these tanks will require a plan check and compliance with closure conditions from the County of Los	The Applicant's consulting environmental engineer will stop excavation and	Applicant and contractor(s)	During grading and construction activities	County of Los Angeles Department of Public Works	_____	City of Signal Hill Building Department

No.	Mitigation Measure	Implementation Action	Monitoring Party	Monitoring Phase	Verification/ Approval Party	Mitigation Measure Implemented? (Y/N) & Date	Documentation Location (Monitoring Record)
	Angeles Department of Public Works, Environmental Programs Division pursuant to Los Angeles County Code, Title 11, Division 4 and California Code of Regulations, Title 23, Division 3, Chapter 16.	construction activities if underground storage tanks are discovered and, as necessary, submit an Application for Closure for Hazardous Material Underground Storage Tanks with the County of Los Angeles Department of Public Works.			City of Signal Hill Building Department		
MM-3.6-5	The Project proponent shall obtain a "Dig Alert" identification number two working days in advance of commencement of excavation activities.	The Applicant's consulting environmental engineer will obtain a "Dig Alert" identification number at least two working days prior to excavation activities.	Applicant and contractor(s)	At least two working days prior to excavation activities	City of Signal Hill Building Department	_____	City of Signal Hill Building Department
BIOLOGICAL RESOURCES							
MM-3.8-1	Removal of on-site vegetation shall be accomplished in a manner that avoids impacts to any active nests during the breeding season. If the vegetation is entirely removed outside of the nesting season, which is September 1 through February 14, no surveys or monitoring will be required. If construction activities must occur during the nesting season, the City shall obtain the services of a qualified biologist to conduct a pre-construction nest survey on the Project Site and within a 150-foot buffer area around the Project disturbance footprint to identify any nests that occur there. This survey shall be	The Applicant will retain a qualified biologist if removal of on-site vegetation will occur during the breeding season.	Applicant and contractor(s)	Prior to Grading Permit issuance and during construction	City of Signal Hill Building Department	_____	City of Signal Hill Building Department

No.	Mitigation Measure	Implementation Action	Monitoring Party	Monitoring Phase	Verification/ Approval Party	Mitigation Measure Implemented? (Y/N) & Date	Documentation Location (Monitoring Record)
	carried out within one week prior to initiation of grading activities. If bird species protected under the Migratory Bird Treaty Act or California Fish and Game Code Sections 3503 and 3513 are found nesting within 150 feet of the Project disturbance area, a qualified biologist shall monitor the nests daily during all phases of construction to ensure that the Project does not impact the nests. Clearing and grading activities shall not be allowed within 150 feet of active nests. If an active nest is discovered on-site or within 150 feet of the Project disturbance area, then clearing and/or grading activities shall be delayed in areas within 150 feet of nests until it has been determined by a qualified biologist that the chicks have fledged.						
CULTURAL RESOURCES							
MM-3.9-1	Prior to issuance of a grading permit, a qualified archaeologist, experienced with Native Americans and Native American resources will be retained by the City of Signal Hill. The archaeologist shall be present at a pre-grading conference with the contractor and shall establish procedures for archaeological resource surveillance and work stoppage if cultural resources are encountered. Should buried cultural resources be encountered by the contractor during construction activities, work in that area must be halted until the archaeologist is notified and can evaluate the nature and significance of the find and if necessary, coordinate the appropriate efforts for handling and/or disposition of these materials. The City of Signal Hill Community Development Department shall be notified immediately if cultural resources are encountered.	Contractor will stop construction if cultural resources are encountered. Qualified archaeologist will be notified to verify finding and coordinate handling and/or disposition of materials.	Qualified archaeologist City of Signal Hill Community Development Department	Prior to Grading Permit issuance and during grading/ construction	City of Signal Hill Community Development Department	_____	City of Signal Hill Community Development Department

No.	Mitigation Measure	Implementation Action	Monitoring Party	Monitoring Phase	Verification/ Approval Party	Mitigation Measure Implemented? (Y/N) & Date	Documentation Location (Monitoring Record)
MM-3.9-2	Prior to issuance of a grading permit, a qualified paleontologist will be retained by the City of Signal Hill. The paleontologist shall be present at a pre-grading conference with the contractor and shall establish procedures for paleontological resource surveillance and work stoppage if paleontological resources are encountered. Should buried paleontological resources be encountered by the contractor during construction activities, work in that area must be halted until the paleontologist is notified and can evaluate the nature and significance of the find and if necessary, coordinate the appropriate efforts for handling and/or disposition of these materials. The City of Signal Hill Community Development Department shall be notified immediately if paleontological resources are encountered.	Contractor will stop construction if cultural resources are encountered. Qualified paleontologist will be notified to verify finding and coordinate handling and/or disposition of materials.	Qualified paleontologist City of Signal Hill Community Development Department	Prior to Grading Permit issuance and during grading/ construction	City of Signal Hill Community Development Department	_____	City of Signal Hill Community Development Department
MM-3.9-3	If human remains are encountered during construction-related activities, in conformance with State of California Health and Safety Code Section 7050.5, disturbance of the immediate area near the remains shall be immediately halted until the Los Angeles County Coroner has made a determination regarding the origin and disposition as required by California Public Resources Code Section 5097.98. If encountered remains are determined to be of Native American notified origin, the Native American Heritage Commission shall be notified within one business day of discovery and the Gabrielinos/Tongva Tribal Nation shall be notified within one business day of discovery.	Contractor will stop construction if human remains are encountered. The County Coroner will be contacted.	City of Signal Hill Building Department	During grading and construction activities	City of Signal Hill Building Department	_____	City of Signal Hill Building Department