RISK MANAGEMENT ANALYSIS (REVISED) REPORT

RI-NU ENVIRONMENTAL SERVICES
WASTE TREATMENT FACILITY
815 MISSION ROCK ROAD
SANTA PAULA, CALIFORNIA 93060

EnSafe Project Number
0888829409

Prepared for:

RI-NU Environmental Services, LLC
15218 Summit Avenue
Suite 300 #601
Fontana, California 92336

Original Report Date: January 3, 2019
Revised May 20, 2021

5724 Summer Trees Drive
Memphis, Tennessee 38134
901-372-7962 | 800-588-7962
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County of Ventura
Initial Study
PL15-0106
Attachment 7 - Risk Management Analysis

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Prepared by:

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ATTACHMENTS

EXECUTIVE SUMMARY

EnSafe Inc. facilitated a risk management analysis of the RI-NU Environmental Services, LLC (RI-NU) proposed waste treatment facility located at 815 Mission Rock Road, Santa Paula, California (Site). The risk management analysis was conducted utilizing the process hazard analysis (PHA) methodology. The PHA included review of the proposed waste treatment processes and ancillary processes (including unloading, storage, and onsite chemical transport) at the facility.

The RI-NU waste treatment plant will operate as a centralized waste treatment facility and will receive wastes from numerous industries and activities. As received, these wastes may contain pollutants including metals, oils, suspended solids, and organics which require treatment and/or removal prior to shipment offsite to other facilities for final treatment and/or disposal. Wastes will not be discharged from the waste treatment facility directly to the Oxnard municipal sewer system.

The hazard analysis method used for the PHA was a combination What-If and Hazard and Operability study. This method was selected due to the complexity and nature of the processes evaluated. The PHA methodology included determination of multiple hazard scenarios. For each hazard scenario, the PHA team identified potential causes, consequences, safeguards, and controls. The PHA team utilized a risk-ranking tool to determine the potential likelihood of an adverse incident, the potential severity of the incident, and overall risk rank.

If the PHA team felt that existing safeguards were not adequate to control the hazards or that additional safeguards could further reduce risk, recommendations were documented. Recommendations were typically designed to reduce the likelihood of an adverse incident, reduce the severity of an incident, and/or improve safety at the Site. The PHA team identified nine recommendations for consideration. The recommendations addressed the following issues:

- Use of double-walled tubing for chemical transfers
- Design optimization of chemical feed areas to minimize opportunities for vehicle collisions
- Establishment of designated paths to the hazardous material storage building for delivery trucks
- Design and construction of a hazardous material storage building that is compliant with local/state chemical storage and fire protection standards

- Establishment of policies that:
  - prohibit receipt of wastes in totes or drums
  - prohibit pumping of drums or totes into any vacuum truck
- Implementation of a New Chemical Introduction/Procurement Policy
- Establishment of a program to familiarize local emergency responders with Site operations and hazards
- Posting of appropriate hazard warning signage at the hazardous materials storage building
- Posting of appropriate informational signage at the truck unloading area to identify unloading valves/piping

1.0 INTRODUCTION

EnSafe Inc. facilitated a risk management analysis of the RI-NU Environmental Services, LLC (RI-NU) proposed waste treatment facility located at 815 Mission Rock Road, Santa Paula, California (Site). The risk management analysis was conducted utilizing the process hazard analysis (PHA) methodology. The PHA included review of the proposed waste treatment processes and ancillary processes (including unloading, storage, and onsite chemical transport) at the facility.

The risk management analysis was facilitated by Mr. Leo Old, PE, CSP, CIH, Associate Principal of EnSafe, and Mr. Glen Bianchi, Senior Project Manager of EnSafe. Mr. Rob Dal Farra, PE, Vice President of SESPE Consulting, Inc., arranged and coordinated the PHA.

2.0 PROCESS DESCRIPTION

The RI-NU waste treatment plant, located in Santa Paula, California, will operate as a centralized waste treatment facility and will receive wastes from numerous industries and activities. As received, these wastes may contain pollutants including metals, oils, suspended solids, and organics which require treatment and/or removal prior to shipment offsite to other facilities for final treatment and/or disposal. Wastes will not be discharged from the waste treatment facility directly to the Oxnard municipal sewer system. The facility will receive the following wastes:

- Industrial Wastewater Containing Metals (40 Code of Federal Regulations [CFR] Part 437 Subcategory A wastes) — This includes wastes such as neutralized acid wastewater, boiler blowdown brine, and metal finish wastewater.

- Oily Wastewater (40 CFR Part 437 Subcategory B wastes) — This includes wastes such as materials from oilfield wastewater, oil spills, oil-water emulsions, contaminated groundwater from petroleum sources, bilge water, and aqueous and oil mixtures from parts-cleaning operations.

- Industrial Wastewater Containing Organics (40 CFR Part 437 Subcategory C wastes) — This includes wastes such as solvent-bearing wastes, contaminated groundwater clean-up from non-petroleum sources, landfill leachate, floral wastewater, and tank clean-out fluids from organic non-petroleum sources.

- Domestic Wastes — This includes septic tank wastes, portable restroom waste, and secondary sewage.

- Oilfield Sludge Wastes — This category includes oilfield drilling muds and tank bottoms. The drilling muds and cuttings are generated during the drilling of oil and gas wells. The tank bottoms include solids removed from the bottom of storage tanks used in the production of crude oil.

Wastes are delivered by truck to the Site. Process flow diagrams referenced during the PHA are included as Attachment A.

A separate Onsite Traffic Analysis and Queuing Plan (Queuing Plan) was developed by Sespe Consulting and is included as Attachment B. The Queuing Plan includes a summary of truck activity, safety measures to address the significant truck traffic onsite, and diagrams indicating designated truck routes onsite.

3.0 PREVIOUS INCIDENT REVIEW

EnSafe reviewed with the PHA team the *Root Cause Investigatory Report* provided by The Law Office of Michael D. Bradbury (February 27, 2015). On November 18, 2014, an explosion occurred at the Santa Clara Waste Water Company (SCWW; former name of the RI-NU waste treatment facility). The explosion was the result of an undesirable chemical reaction between sodium chlorite (active ingredient in Headline 3875, Miles Chemical) and nonhazardous domestic wastes in a vacuum truck. An SCWW employee inadvertently pumped the contents of a tote of Headline 3875 into a vacuum truck that contained domestic wastes. Pressure within the truck's tank increased to a level causing a rupture of the vacuum truck's tank. The *Root Cause Investigatory Report* recommended at least two policy changes:

- *The facility will no longer accept any wastewater contained in totes. The only totes allowed to be present on the premises will contain clearly-marked and labeled chemical treatment processes.*

- *Additional and targeted safety training will reinforce the new policy that all liquid materials in totes are to be considered "product" and shall never be handled or processed as wastewater, along with posted detailed protocols and reminders, as well as listed potential sanctions for any violations.*

The PHA team considered the events associated with the November 18, 2014, incident, and RI-NU personnel indicated their intent to implement the recommendations from the *Root Cause Investigatory Report*.

4.0 PROCESS HAZARD ANALYSIS METHODOLOGY

The hazard analysis method used for the PHA was a combination What-If and Hazard and Operability Study. This method was selected due to the complexity and nature of the processes evaluated. The PHA included the following:

- Participation by SESPE Consulting engineering and RI-NU management personnel (the attendance sheets are included as Attachment C)
- Site tour with representatives from the County of Ventura, RI-NU, and SESPE Consulting
- Review of process safety information (process safety information checklist is included as Attachment D)
- Review of the facility's incident history
- Documentation of safety-related controls
- Development of recommendations based on PHA team discussions

The PHA methodology included determination of multiple hazard scenarios. For each hazard scenario, the PHA team identified potential causes, consequences, safeguards, and controls. The PHA team utilized a risk-ranking tool to determine the potential likelihood of an adverse incident, the potential severity of the incident, and overall risk rank. A copy of the risk-ranking matrix is included as Attachment E. The PHA also included an assessment of facility siting and human factor concerns.

The hazard scenarios with causes, consequences, safeguards, and controls are documented in the PHA worksheets (Attachment F). A separate worksheet was developed for each of the following nodes:

- Node 1 — Tank Bottoms
- Node 2 — Drilling Mud
- Node 3 — Production Water

- Node 4 — Subcategory A Industrial-Metals
- Node 5 — Subcategory C Organics
- Node 6 — Domestic Wastewater
- Node 7 — Utilities
- Node 8 — Hazardous Materials Storage
- Node 9 — Facility Siting and Human Factors

For each hazard scenario, the PHA team identified safeguards and engineering controls that were directly related to the scenario. In addition to listing in the PHA worksheets, a list of all identified controls and safeguards is included in Attachment G.

The Queuing Plan was considered when reviewing vehicular collision scenarios, as documented on the PHA worksheets.

5.0 RECOMMENDATIONS

If the PHA team felt that existing safeguards were not adequate to control the hazards or that additional safeguards could further reduce risk, recommendations were documented. Recommendations were typically designed to reduce the likelihood of an adverse incident, reduce the severity of an incident, and/or improve safety at the Site. The numbering of the recommendations are related to the location within the PHA worksheets to facilitate reference if further information is needed for a specific recommendation. The PHA team identified nine recommendations for consideration, which address the following:

- Use of double-walled tubing for chemical transfers
- Design optimization of chemical feed areas to minimize opportunity for vehicle collisions
- Establishment of designated paths to the hazardous material storage building for delivery trucks
- Design and construction of a hazardous material storage building that is compliant with local/state chemical storage and fire protection standards

- Establishment of policies that:
  - prohibit receipt of wastes in totes or drums
  - prohibit pumping of drums or totes into any vacuum truck
- Implementation of a New Chemical Introduction/Procurement Policy
- Establishment of a program to familiarize local emergency responders with site operations and hazards
- Posting of appropriate hazard warning signage at hazardous materials storage building
- Posting of appropriate informational signage at truck unloading area to identify unloading valves/piping

A summary of recommendations is included in Attachment H.

6.0 DISCLAIMER

This report is for the sole use of RI-NU Environmental Services. Use of this report by any other party will be at such party's sole risk, and EnSafe disclaims liability for any such use or reliance by third parties. The results presented in this report are indicative of conditions at the time of the risk management analysis. This study does not purport to include every safety or health hazard at this location, and only those areas specifically mentioned were evaluated. EnSafe prepared this report based upon the direction and information provided by RI-NU Environmental Services and shall not assume responsibility for misinformation that EnSafe could not reasonably determine was incorrect at the time of the performance of work.

Attachment A
Process Flow Diagrams

VAPOR RECOVERY IF NEEDED

COMPOST/WOODCHIP BIO-F LTER

NON-CWT WASTE STREAMS

CENTRIFUGE

CAUSTIC SODA

SLUDGE TO ENCLOSED BIN

DOMESTIC WASTE

DOMESTIC

SCREEN BOX

MIXING TANK

FINAL EFFLUENT TANKS (NON-CWT)

SUBCATEGORY A

INDUSTRIAL - METALS

SCREEN BOX

HOLDING TANKS

SOLIDS TO O&G MIXING TANK FOR DEWATERING (DWG P-2)

SUBCAT A INF S.P.

CAUSTIC SODA

POLYMER

CLARIFIER

SOLIDS TO O&G MIXING TANK FOR DEWATERING (DWG P-2)

FILTERS

GAC VESSELS

SUBCAT A EFF S.P.

SUBCATEGORY C

INDUSTRIAL - ORG

SCREEN BOX

HOLDING TANKS

SOLIDS TO O&G MIXING TANK FOR DEWATERING (DWG P-2)

SUBCAT C INF S.P.

CLARIFIER

BYPASS

OZONE GEN

OZONE CONTACT TANKS

FILTERS

GAC VESSELS

SUBCAT C EFF S.P.

DOMESTIC & NON-CWT STREAMS

Compliance S.P.

CAUSTIC SODA

Compliance S.P.

FINAL EFFLUENT TANKS - CWT

SUBCAT D EFF S.P.

TO TRUCKS FOR OFFSITE DISPOSAL

EFFLUENT FROM O&G TRAINS (DWG P-2)

S.P. Sampling Point

SUBCAT A EFF S.P. Sampling Point – Subcategory Demonstration Test

Compliance S.P. Compliance Sampling Point

INNOVATIVE TREATMENT
P.O. BOX 3970
FULLERTON, CA 92834
(714) 745-4692

TITLE: CWT & DOMESTIC WASTE TREATMENT FACILITY

DESCRIPTION: PIPING & INSTRUMENTATION DIAGRAM
INDUSTRIAL & DOMESTIC WASTE TREATMENT TRAINS

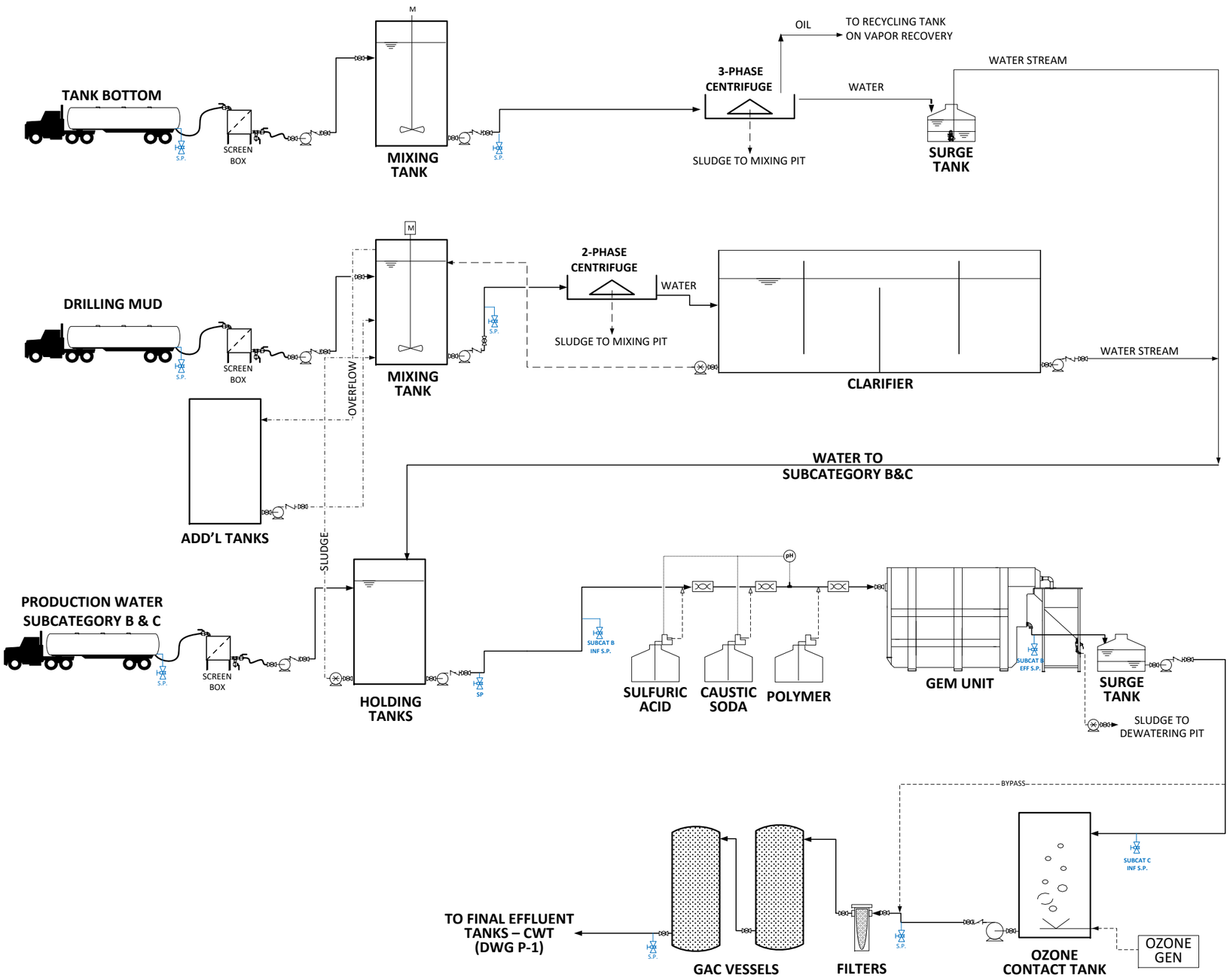
SCALE: NONE

DESIGNED BY: AL

DRAWN BY: AL

DATE: 4/5/18

DRAWING No.: P-1



S.P. Sampling Point

SUBCAT B INF S.P. Sampling Point – Subcategory Demonstration Test

Compliance S.P. Compliance Sampling Point

NOTE: SLUDGE PRODUCED IN THE DEWATERING PITS WILL BE DISPOSED AT A LOCAL LANDFILL

INNOTREAT INC.
INNOVATIVE TREATMENT
P.O. BOX 3970
FULLERTON, CA 92834
(714) 743-4692

TITLE	CWT & DOMESTIC WASTE TREATMENT FACILITY
DESCRIPTION	PIPING & INSTRUMENTATION DIAGRAM OIL & GAS TREATMENT TRAIN
DRAWING No.	P-2
SCALE	NONE
DESIGNED BY	AL
DRAWN BY	AL
DATE	4/5/18

Attachment B
Onsite Traffic Analysis and Queuing Plan

SESPE CONSULTING, INC.
A Trinity Consultants Company
374 Poli Street, Suite 200 • Ventura, CA 93001 • Office (805) 275-1515 • Fax (805) 667-8104

ON-SITE TRAFFIC ANALYSIS AND QUEUING PLAN

RI-NU Services, LLC
815 Mission Rock Road
Santa Paula, CA 93060

May 2021

Prepared for:
RI-NU Services, LLC
15218 Summit Avenue, Suite 300 #601
Fontana, CA 92336

Prepared by:
Sespe Consulting, Inc.
374 Poli Street, Suite 200
Ventura, CA 93001
(805) 275-1515

SESPE CONSULTING, INC.
A Trinity Consultants Company
374 Poli Street, Suite 200 • Ventura, CA 93001 • Office (805) 275-1515 • Fax (805) 667-8104

ON-SITE TRAFFIC ANALYSIS AND QUEUING PLAN

RI-NU Services, LLC
Santa Paula, CA

May 2021

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APPENDICES

ON SITE TRAFFIC ANALYSIS AND QUEUING PLAN

RI-NU Services, LLC
Santa Paula, CA

1.0 INTRODUCTION AND SUMMARY

Facility Name:	RI-NU Services, LLC
Facility Address:	815 Mission Rock Road Santa Paula, California 93060
Site Contact:	Timothy J. Koziol, (915) 323-7200
Type of Facility:	Non-Hazardous Waste Treatment Facility
Scale of Operation:	Approximately 6.6 acres

This analysis of expected on-site traffic for the proposed RI-NU services Facility is intended to evaluate expected traffic loading and develop appropriate traffic circulation patterns on the Facility to minimize potential for vehicle collisions and issues resulting from collisions.

1.1 Summary of On-site Operations

The proposed operations at the RI-NU Services, LLC (RI-NU) Facility (Facility) include: accepting, treating, and off-site disposal of various types of non-hazardous waste streams. Trucks from clients' waste producing operations transport non-hazardous waste to the Facility. The Facility accepts non-hazardous wastes which include domestic wastes, industrial wastewater, oily wastewater, and oilfield sludge wastes. The Facility pumps waste from incoming trucks into enclosed tanks for temporary storage before treatment. Semi-solid oilfield sludge wastes are transferred directly into the solid waste load out area for treatment. The Facility treats waste with equipment such as shakers, centrifuges, clarifiers, and screens. After treatment, the wastes are pumped into holding tanks and then loaded back into trucks for transportation to offsite disposal facilities. No treated waste will be transported via pipeline to an authorized disposal location.

There are two waste offloading areas:

- Domestic waste offloading is located on the west side of the Facility. As domestic waste trucks do not need to have their loads sampled, Facility personnel will direct domestic waste trucks to the offloading area when they arrive at the Facility.
- All other non-domestic waste trucks (industrial wastewater, oily wastewater, and oilfield sludge) will be staged at the east side of the Facility while their loads are inspected and sampled for laboratory analysis. Once approved, trucks will move to the main offloading areas located at the southeast side of the Facility.

There are two loading areas used to fill trucks with treated waste for offsite shipping:

- Domestic waste loading is located on the west side of the Facility next to the domestic offloading area.
- Treated non-domestic waste loading is located in the central portion of the Facility near the treated waste holding tanks. Please refer to Figure 1 for the location of the offloading and loading areas.

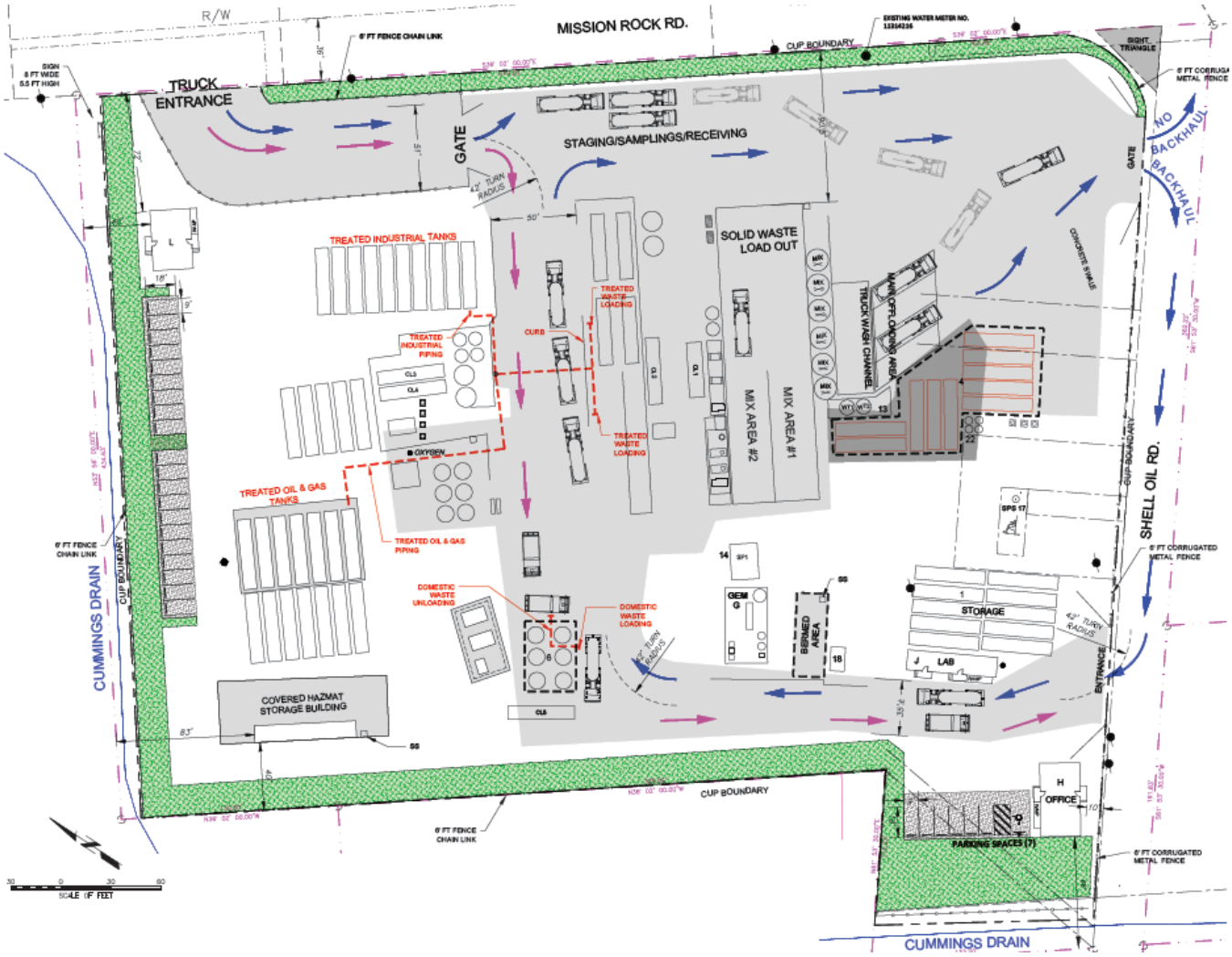


Figure 1: Operational Queuing Plan.

1.2 On-site Traffic Activity

The project description proposed a daily average truck limit (all trucks) of 83.3 with a maximum daily total truck limit of 100 (this includes incoming waste trucks, outgoing waste trucks and other delivery trucks).

Please refer to Table 1 for the expected truck activity that was included in the most recent project description update. This truck activity estimate is based on the proposed daily average truck limit (all trucks) of 83.3 and optimistically assumes 50% of the trucks bringing non-domestic waste can be used to back haul treated waste off of the site.

Table 1: Average Daily Truck Activity with 50% Backhaul

Proposed weekly truck limit:	500	trucks (1,000 trips) Mon. - Sat.							
Ave. Daily Truck Limit:	83.3								
Ave. Daily Waste Trucks:	80	assume ±3 trucks/day for supplies, other							
Inbound Waste Volume Allowed Within Truck Limit:	208,000	gal/day							
WASTE STREAM	INCOMING TRUCK SIZE (gal)	% of INCOMING WASTE VOLUME	# of TRUCKS IN PER DAY	DAILY INCOMING VOLUME (gal)	OUTGOING TRUCK SIZE (gal)	DAILY OUTGOING VOLUME (gal)	# of TRUCKS OUT PER DAY	% BACK HAUL TRUCKS	SUBTRACT BACK HAUL TRUCKS PER DAY
Oil & Gas Sludges (120 bbl trucks)	5,040	50%	20.6	104,000	5,040	104,000	20.6	50%	-10.3
Type A Wastes - Industrial Wastewater Containing Metals (120 bbl trucks)	5,040	10%	4.1	20,800	5,040	20,800	4.1	50%	-2.1
Type B Wastes - Oily Wastewater (120 bbl trucks)	5,040	20%	8.3	41,600	5,040	41,600	8.3	50%	-4.1
Type C Wastes - Industrial Wastewater Containing Organics (120 bbl trucks)	5,040	10%	4.1	20,800	5,040	20,800	4.1	50%	-2.1
Domestic (1,000 gal. in, 6,000 gal. out)	1,000	10%	20.8	20,800	6,000	20,800	3.5	0%	0.0
		100%	57.9	208,000		208,000	40.6		-18.6
	TOTAL TRUCKS IN + OUT:		80.0						

The truck activity estimate in Table 2 is based on the proposed maximum daily truck limit (all trucks) of 100 and optimistically assumes 50% of the trucks bringing non-domestic waste can be used to back haul treated waste off of the site.

Table 2: Maximum Daily Truck Activity with 50% Backhaul

Proposed weekly truck limit:	500	trucks (1,000 trips) Mon. - Sat.							
Ave. Daily Truck Limit:	83.3								
Ave. Daily Waste Trucks:	80	assume ±3 trucks/day for supplies, other							
Inbound Waste Volume Allowed Within Truck Limit:	252,200	gal/day							
WASTE STREAM	INCOMING TRUCK SIZE (gal)	% of INCOMING WASTE VOLUME	# of TRUCKS IN PER DAY	DAILY INCOMING VOLUME (gal)	OUTGOING TRUCK SIZE (gal)	DAILY OUTGOING VOLUME (gal)	# of TRUCKS OUT PER DAY	% BACK HAUL TRUCKS	SUBTRACT BACK HAUL TRUCKS PER DAY
Oil & Gas Sludges (120 bbl trucks)	5,040	50%	25.0	126,100	5,040	126,100	25.0	50%	-12.5
Type A Wastes - Industrial Wastewater Containing Metals (120 bbl trucks)	5,040	10%	5.0	25,220	5,040	25,220	5.0	50%	-2.5
Type B Wastes - Oily Wastewater (120 bbl trucks)	5,040	20%	10.0	50,440	5,040	50,440	10.0	50%	-5.0
Type C Wastes - Industrial Wastewater Containing Organics (120 bbl trucks)	5,040	10%	5.0	25,220	5,040	25,220	5.0	50%	-2.5
Domestic (1,000 gal. in, 6,000 gal. out)	1,000	10%	25.2	25,220	6,000	25,220	4.2	0%	0.0
		100%	70.3	252,200		252,200	49.2		-22.5
	TOTAL TRUCKS IN + OUT:		97.0						

Based on the calculations in these tables, it can be shown:

- The average number of incoming waste trucks plus outgoing waste trucks is expected to be approximately 80 trucks per day, and 3 trucks per day for other supply trucks. The maximum number of incoming waste trucks plus outgoing waste trucks is expected to be approximately 97 trucks per day, and 3 trucks per day for other supply trucks.
- Approximately 21 to 25 incoming trucks per day are expected to be hauling domestic waste into the site. These trucks are not required to be sampled to confirm load contents and can travel directly to the domestic waste offloading area. As the Facility proposes to accept waste loads 12 hours per day, this equates to roughly 2 domestic waste trucks per hour. Domestic waste will be bulked into larger trucks for offsite hauling. If the larger outbound domestic waste haul trucks are accounted for (3.5 to 4.2 trucks per day), the total becomes roughly 24.5 to 29.5 domestic trucks per day, which equates to roughly 2 to 2.5 trucks per hour.
- The remaining 37 to 45 incoming trucks hauling non-hazardous waste will be required to have their loads sampled and analyzed to confirm their contents. As the Facility propose to accept waste loads 12 hours per day, this equates to roughly 3.1 to 3.75 trucks per hour that will be staged for sampling. The

on-site lab will be capable of conducting multiple analyses in parallel, so the time to finalize the analyses and approve these loads can be completed in well under an hour. These trucks will be unloading in one of the 4 available offloading bays before or soon after the next waste trucks arrive at the Facility.

- Continuing the calculations from above, 37 to 45 outbound waste trucks per day will be required to remove treated non-hazardous waste from the site. This equates to roughly 3.1 to 3.75 trucks per hour that will be entering the southern entrance on Shell Oil Road and going to the center of the site to load treated non-hazardous waste for hauling offsite. As these trucks are not waiting to have loads sampled and analyzed (wastes will have had lab analysis post treatment) and there are two non-hazardous waste loading points in the area, loading of these waste trucks is expected to take well under an hour.

In summary, during any maximum operating hour there is expected to be on-site:

- Roughly 3 to 4 industrial waste trucks staged by the entrance gate awaiting load sampling and verification;
- 2 to 3 trucks unloading waste at the main offloading area;
- Roughly 3 to 4 industrial waste trucks loading treated industrial waste at the central area of the Facility; and
- Roughly 2 to 3 trucks either loading or unloading domestic waste.

As demonstrated in the operational queuing plan (Figure 1), the narrowest driveway is located near the southern entrance, is approximately 35 feet wide, and is large enough to safely accommodate the proposed traffic activity without lane markings. Please refer to Appendix 1 for the full-size operational queuing plan that shows a number of trucks in line with the estimates discussed above with extra trucks to demonstrate additional queuing capacity.

1.3 Safety Measures, Risk, and Outcome

The Facility will employ the following safety measures to reduce the likelihood and/or severity of traffic related risk factors:

- Use of a strict 5 mile per hour speed limit on-site for all vehicles;
- Allowing trucks to use the southern Facility entrance along Shell Oil Road to negate the need for U-turns on-site;
- Use of incoming industrial waste trucks for backhauling of treated industrial waste to reduce the total truck activity on surrounding private roads;
- Use of larger vacuum trucks to ship consolidated domestic waste offsite and reduce the total truck activity;
- Use of a treated waste loading manifold to allow single file loading of up to two industrial waste trucks at one time and maximize available driveway space;
- Use of a Receiving Manager to facilitate truck activity on-site;
- Installation of informational signage on-site to guide traffic patterns and identify loading infrastructure and procedures;
- Scheduling of incoming waste deliveries to prevent excess trucks on-site and queuing on Mission Rock Road. Trucks will be required to arrive at the Facility at their schedule times. Trucks that arrive prior to truck delivery hours (7:00AM Monday to Friday; 8:00AM Saturday) will be allowed to queue inside the front gate, but will be provided a warning to arrive only during truck delivery hours. If warned again, the Truck will no longer be allowed to use the Facility for waste disposal;
- Hazardous materials would be stored in a covered storage area away from virtually all on-site traffic

activity;
- All on-site traffic activity will be ceased during the scheduled hazardous materials deliveries to minimize the risk of potential vehicle collisions with the hazardous materials delivery truck; and
- Use of active, on-site guidance of incoming and outgoing waste deliveries throughout the site to minimize the likelihood of a collision.

The implementation of the above safety measures and use of the existing driveways with adequate widths to accommodate the proposed truck turning radii and activity will reduce the likelihood of traffic collision to minimal levels. Furthermore, the health and environmental severity of a traffic collision on-site would be low due to the low collision speed, non-hazardous nature of waste materials, and existing drainage control features that would contain a potential spill. As a result, the risk level of traffic activity on-site is considered minimal.

2.0 INDUSTRIAL AND OILFIELD WASTE

Non-hazardous industrial waste and oilfield waste generators will use the proposed Facility for treatment and disposal of various non-hazardous wastes. For the purposes of this document, both industrial waste and oilfield waste are herein referred to as “industrial waste”. To summarize, incoming industrial waste generators will be staged at the front of the site, sampled for laboratory waste verification, and directed to the main offloading area for off-loading of wastes. Off-loaded industrial waste trucks will then either leave the Facility or serve as a back haul truck for transportation of treated industrial waste to an off-site, authorized disposal Facility. Off-site shipping trucks will enter the Facility at the southern entrance along Shell Oil Road, and load treated wastes in the central area of the Facility for disposal off-site. The typical incoming and outgoing liquid industrial waste trucks are summarized in Figure 2. Incoming industrial waste deliveries and outgoing treated industrial waste shipment and back hauling are further discussed in Sections 2.1 and 2.2 below.

Figure 2: Typical Industrial Waste Trucks – Typical Incoming and Outgoing Liquid Industrial Waste Truck (5,000-Gallon Vacuum Truck; Left); Typical Incoming Solid Industrial Waste Truck (20-40 Cubic Yard Roll Off Truck; Right); and Typical Outgoing Solid Industrial Waste Truck (25-ton Dump Truck; Bottom).

2.1 Industrial and Oilfield Waste Deliveries

Industrial waste generators (i.e., the Facility's customers), including liquid and semi-solid industrial waste, will be required to submit a laboratory profile of their waste streams to ensure the waste is non-hazardous prior to sending it to the Facility for treatment. Preliminarily approved incoming industrial waste will be scheduled with a delivery appointment to prevent truck queuing along Mission Rock Road. The Facility has the capacity to stage up to ten incoming waste delivery trucks at one time; however, as discussed in Sections 1.2 and 2.2, it is expected that only three to four trucks will be staged at one time.

When the incoming waste truck arrives at the Facility at their scheduled time, the truck will be directed to the staging and sampling area at the front of the Facility inside the gate. Signage will be posted to describe the Facility's staging and sampling procedures. A receiving manager will verify the incoming trucks' delivery details, and a waste stream sample will be obtained and analyzed at the proposed in-house laboratory for comparison to the waste profile submitted by the waste generator. The incoming waste will be approved for disposal if the in-house laboratory analysis matches the waste profile submitted by the waste generator

Once the waste is approved for disposal, the truck will pull forward then back into the main off-loading area in

the southern side of the Facility. The trucks will unload via a hose connected to a piping manifold that leads to waste receiving tanks, as instructed by the receiving manager. Up to four trucks may unload at the main off-loading area at one time. If desired by the waste hauler and after unloading, the truck will pull forward then back into the truck wash channel to wash out residual contents with high-pressure water. After washout and if no back hauling is scheduled, the truck will exit the Facility via the southeastern gate along Shell Oil Road and turn left onto Mission Rock Road for departure. Back hauling procedures are discussed in Section 2.2 below.

If the truck is offloading semi-solid industrial waste (e.g., drilling muds and cuttings), it will pull forward from the staging and sampling area then back into the solid waste load out area in the central portion of the Facility. The trucks will unload by dumping their contents into the solid waste load out area, as instructed by the Receiving Manager. If desired by the waste hauler and after unloading, the truck will pull forward then back into the truck wash channel to wash out residual contents with high-pressure water. Then, the truck will pull forward and exit the Facility via the southeastern gate along Shell Oil Road and turn left onto Mission Rock Road for departure.

The industrial waste traffic pattern within the Facility is designed to prevent U-turns on-site. Please refer to Figure 3 for the location of the staging and sampling area, main off-loading area, solid waste load out area, truck wash channel, and industrial waste traffic pattern including the trucks' approximate turning radii. As depicted in the Figure 3, there is ample room for the trucks to navigate within the Facility without risk of collision with stationary equipment or other trucks on-site.

2.2 Industrial and Oilfield Waste Off-site Shipping and Back Hauling

Treated, non-hazardous industrial waste will be shipped off-site in both non-back haul trucks and back haul trucks to other offsite disposal facilities. Off-site shipping trucks will enter the Facility at the southern entrance along Shell Oil Road, and load treated wastes in the central area of the Facility for disposal off-site. The trucks will load via a hose connected to a manifold that is hard piped to the treated waste storage tanks; the connection between the loading manifold and waste storage tanks will be run through an existing, below grade channel across the driveway. Please refer to Figure 3 for the location of the industrial waste loading area and loading infrastructure. The loading manifold will allow loading of up to two trucks at once in a single file line; trucks will not be loaded side by side. After loading treated industrial waste, the trucks will pull forward, turn right and exit the Facility at the southeastern gate along Shell Oil Road, then turn left to Mission Rock Road for departure. Please refer to Figure 3 for the traffic pattern for industrial waste shipment trucks.

A back haul truck is an incoming industrial waste truck that offloads its contents as discussed in Section 2.1, and immediately returns to load treated industrial waste on-site for disposal at an off-site disposal Facility. Depending on the need for additional trucks to ship treated industrial waste off-site, the receiving manager will schedule a back haul with an incoming industrial waste truck (i.e., independent contractor) when the waste delivery is scheduled. The back haul operators will not be owned by the applicant in most cases. The receiving manager will coordinate with the waste transporter to identify all back haul trucks.

After unloading the incoming industrial waste, the back haul truck will pull forward, then, if necessary, back into the truck wash channel to wash out residual contents with high-pressure water. The back haul truck will then pull forward and exit the Facility at the southeastern gate along Shell Oil Road, turn right onto Shell Oil Road, then turn right to enter the Facility at the southern gate along Shell Oil Road. The back haul trucks will then load treated industrial waste and exit the Facility as described above. Please refer to Figure 3 for the traffic pattern for industrial waste back haul trucks transporting waste off site (same traffic pattern as non-back haul trucks).

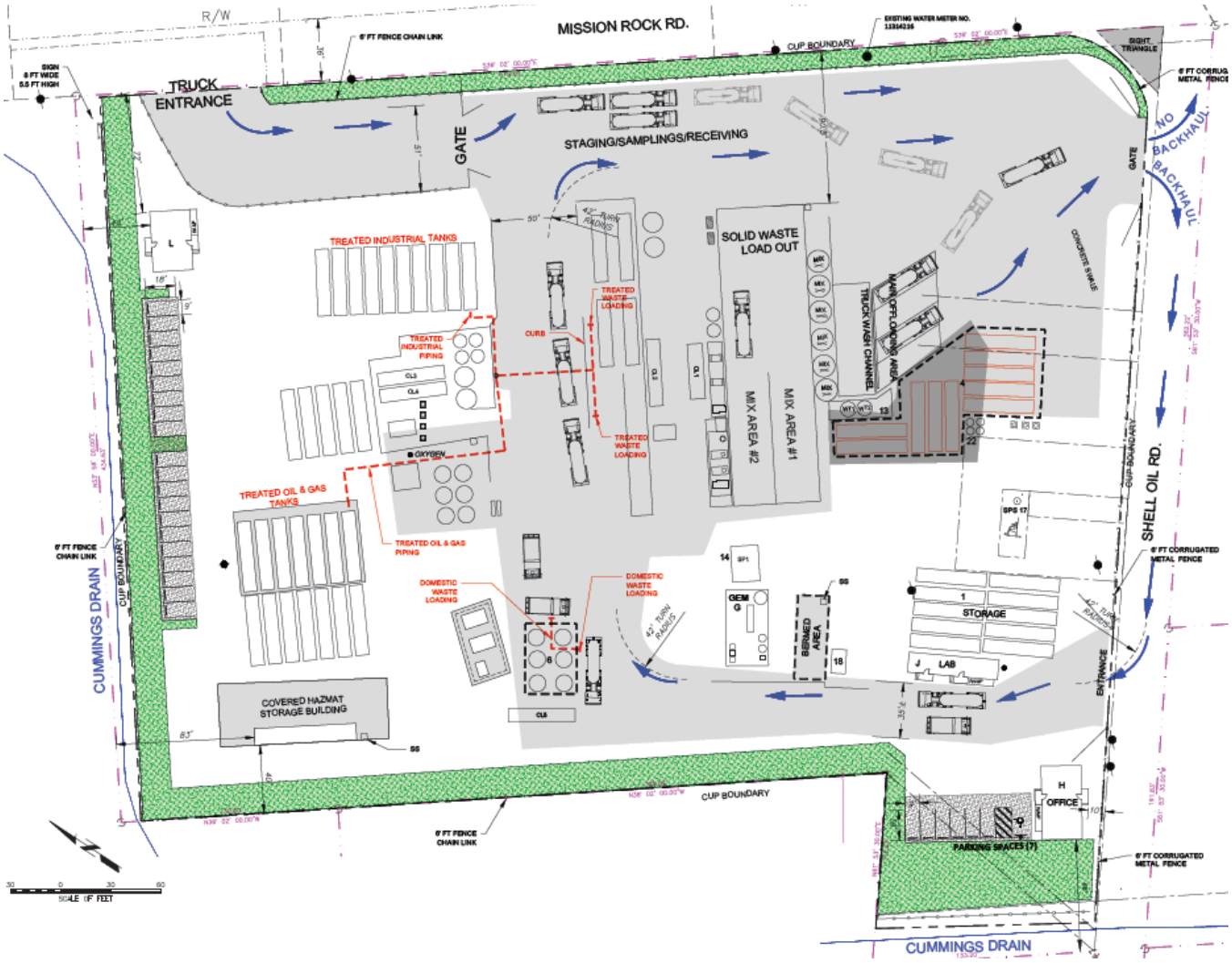


Figure 3: Industrial Waste Queuing Plan

3.0 DOMESTIC WASTE

Domestic waste generators will use the proposed Facility for disposal of domestic wastes from septic tanks, portable toilets, etc. To summarize, incoming domestic waste generators will enter the Facility at the northern gate and be directed to the domestic waste loading area for off-loading. Off-loaded domestic waste trucks will then exit the Facility via the southern gate along Shell Oil Road. Please refer to Figure 4 for the typical domestic waste haul trucks. Incoming domestic waste deliveries and outgoing, consolidated domestic waste shipment are further discussed in Sections 3.1 and 3.2 below.

Figure 4: Typical Domestic Waste Trucks – Typical Incoming Liquid Domestic Waste Truck (1,200 to 2,000-Gallon) (Left); and Typical Outgoing Liquid Domestic Waste Truck (6,000-Gallon) (Right).

3.1 Domestic Waste Deliveries

Incoming domestic waste will be scheduled with a delivery appointment slot to prevent truck queuing along Mission Rock Road. The incoming domestic waste truck will be verified by the Receiving Manager when it arrives at the Facility. The domestic waste generators will not be required to submit a laboratory profile of their waste stream or be sampled for laboratory analysis on-site; thus, domestic waste trucks will be able to off-load in less time than industrial waste trucks. Once the truck is verified, the truck will turn right and proceed towards the domestic waste loading area for off-loading. The trucks will unload their domestic waste via a hose connected to the domestic waste receiving tanks, as instructed by the receiving manager. Domestic waste trucks will not use the truck wash channel. After off-loading, the truck will pull forward and exit the Facility via the southern gate along Shell Oil Road, then turn left onto Mission Rock Road for departure. Please refer to Figure 5 for the location of the domestic waste off-loading area and domestic waste traffic pattern.

3.2 Domestic Waste Consolidation and Off-site Shipping

Consolidated domestic waste will be shipped off-site in 6,000-gallon vacuum trucks to other offsite disposal facilities. The domestic waste shipping trucks will have considerably larger tank capacity that the incoming trucks; thus, the domestic truck activity will be considerably reduced. Off-site domestic waste shipping trucks will enter the Facility at the front entrance along Mission Rock Road, and load consolidated domestic waste in the domestic waste loading area of the Facility for disposal off-site. The trucks will load via a hose connected to the domestic waste receiving tanks. After loading consolidated domestic waste, the trucks will turn left and exit the Facility at the southern gate along Shell Oil Road, then turn left to Mission Rock Road for departure. Please refer to Figure 5 for the location of the domestic waste off-loading area and domestic waste traffic pattern.

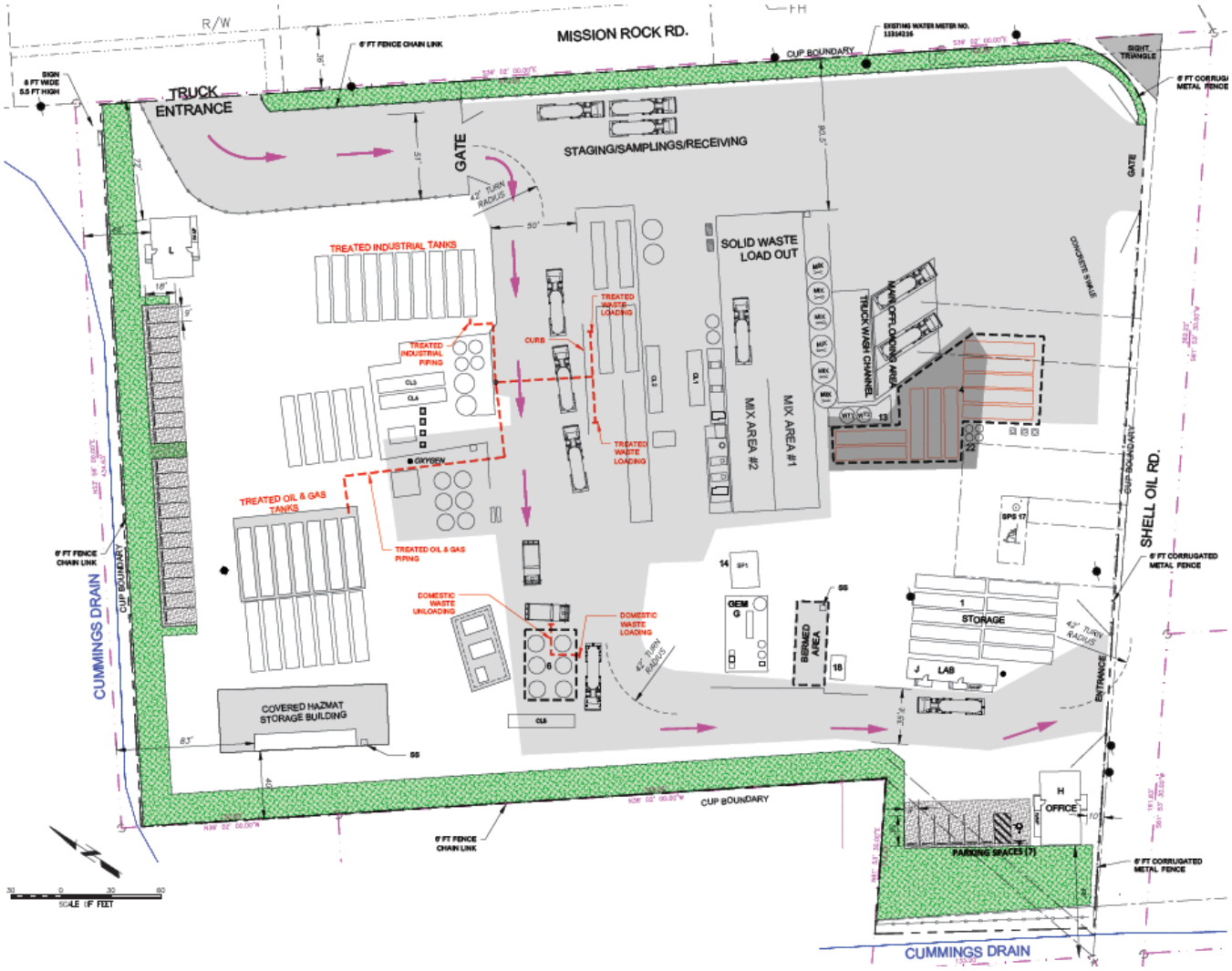


Figure 5: Domestic Waste Queuing Plan

4.0 HAZARDOUS MATERIALS DEILVERIES

The Facility uses a variety of hazardous materials (chemicals) in the waste treatment process. Hazardous materials will be safely stored in the covered hazardous materials storage building in the northwest corner of the site. A number of the hazardous materials are consumed during the waste treatment process and must be replenished on a monthly basis.

Hazardous material deliveries will occur approximately two to three times per month, and will occur during normal truck delivery hours (Monday through Friday, 7:00 a.m. to 7:00 p.m.; Saturday, 8:00 a.m. to 3:00 p.m.). All on-site traffic activity will be ceased during the scheduled hazardous materials deliveries to minimize the risk of potential vehicle collisions with the hazardous materials delivery truck. The Receiving Manager will guide the hazardous materials truck throughout the site to minimize the likelihood of a collision. The hazardous material delivery truck will enter the Facility at the main entrance, turn right, and navigate to the hazardous materials storage building for offloading. After offloading, the truck will turn left pull forward and exit the Facility at the southern gate along Shell Oil Road, then turn left to Mission Rock Road for departure. Please refer to Figure 6 for the location of the hazardous materials storage building and hazardous material delivery traffic route.

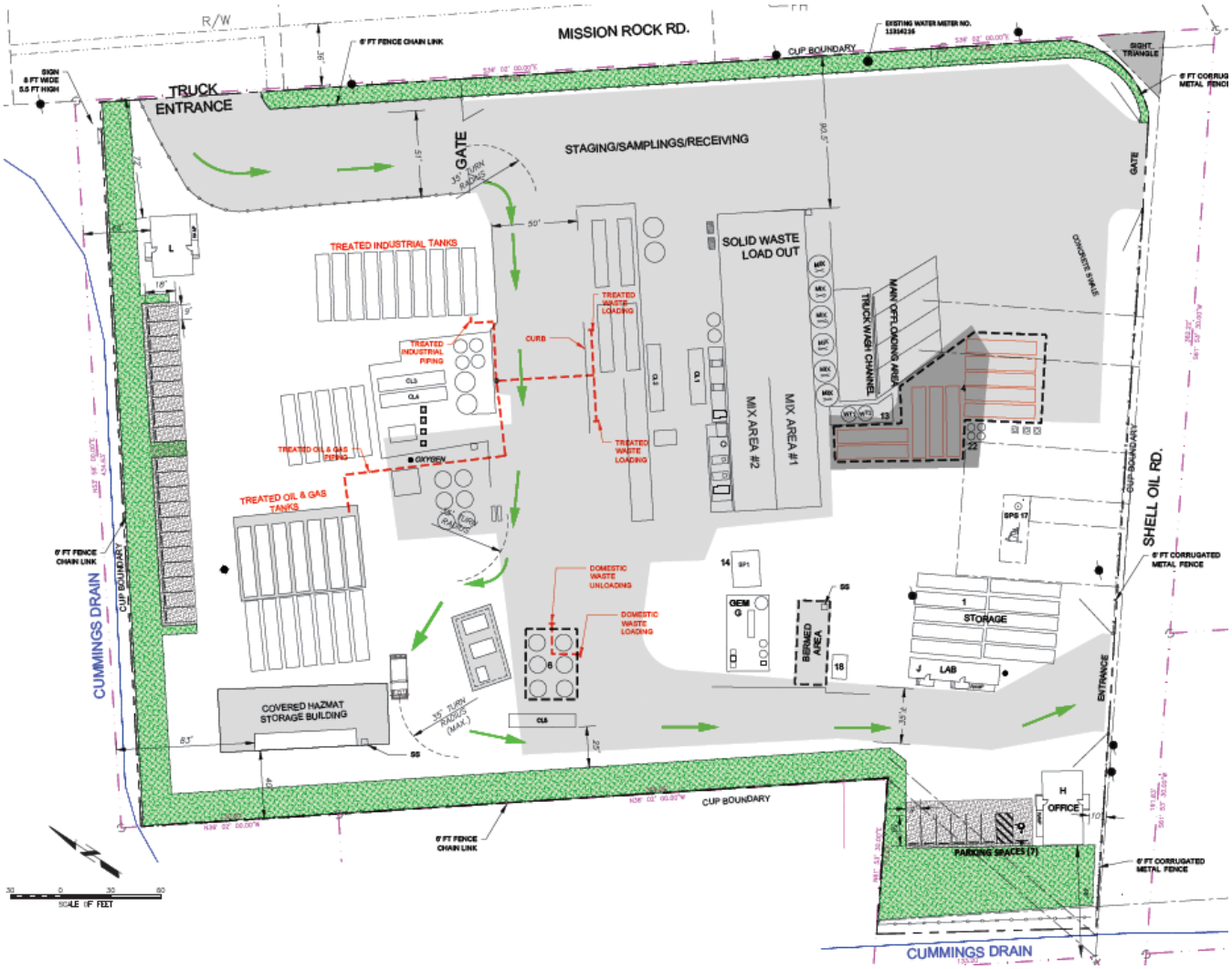


Figure 6: Hazardous Materials Queuing Plan

APPENDIX 1

Operational Queuing Plan

NCZ0 ZONE: M3 10,000 SQ. FT.

GENERAL PLAN: EXISTING COMMUNITY

LEGEND

- CUP BOUNDARY 6.3 ACRE ±
- LOT LINE
- PARCEL LINE
- 6 FT HIGH CHAINLINK FENCE
- 6 FT HIGH CORRUGATED METAL FENCE
- EASEMENTS
- EXISTING AC./CONCRETE
- PROPOSED AC./CONCRETE
- LANDSCAPE AREA
- GRAVEL SURFACE

TRAFFIC

- DOMESTIC TRAFFIC
- OILFIELD/INDUSTRIAL TRAFFIC

- FIRE HYDRANT (FH)
- EDISON POWER POLE
- BERM
- "DAY TANK" IN USE CHEMICAL ON CONTAINMENT
- COMPRESSED GAS CYLINDER
- ABANDONED OIL WELL
- ACTIVE OIL WELL
- SS ☐ SAFETY SHOWER/EYEWASH
- SEWER LINE TO OXNARD

QUEUING PLAN:

- THE POSTED SPEED LIMIT FOR ALL TRAFFIC ON SITE WILL BE A MAXIMUM OF 5 MPH.
- ALL INCOMING WASTE DELIVERY TRUCKS WILL BE PRE-APPROVED BASED OFF A PROFILE SUBMITTED PRIOR TO DELIVERY SCHEDULING. ONCE THE PROFILE IS APPROVED, THE MATERIAL WILL BE GIVEN A DELIVERY APPOINTMENT SLOT FOR ACCEPTANCE INTO THE FACILITY.
- ARRIVING TRUCKS WILL BE STAGED AT THE FRONT OF THE FACILITY INSIDE THE GATE. THE TRUCK STAGING AND SAMPLING AREA WILL BE IN THE FRONT OF THE FACILITY INSIDE THE GATE, AND WILL BE MARKED BY SIGNAGE THAT DESCRIBES STAGING AND SAMPLING PROCEDURES.
- A RECEIVING MANAGER WILL REVIEW THE ARRIVING TRUCKS' PAPERWORK TO VERIFY DELIVERY DETAILS. EXCEPT FOR DOMESTIC WASTE TRUCKS, THE ARRIVING TRUCKS' WASTE MATERIAL WILL BE SAMPLED FOR LABORATORY FINGERPRINT ANALYSIS TO VERIFY THE INCOMING WASTE MATCHES THE PRE-APPROVED PROFILE. DOMESTIC WASTE TRUCKS WILL BE SENT TO THE DOMESTIC OFFLOADING AREA.
- ONCE APPROVED, THE TRUCK WILL BE DIRECTED TO ITS APPROPRIATE OFF-LOADING AREA. THE PRE-APPROVAL AND DELIVERY SCHEDULING PROCEDURES WILL PREVENT TRUCK QUEUING ON MISSION ROCK ROAD.
- AFTER UNLOADING THE TRUCK WILL BE WASHED OUT IN THE TRUCK WASHOUT CHANNEL. THE WASH OUT AT THE FACILITY IS A HIGH PRESSURE WATER WASH THAT WILL REMOVE ALL THE INCOMING MATERIAL PRIOR TO ANY LOADING OF OUTBOUND MATERIAL.
- IF THERE IS NO BACK HAUL SCHEDULED IT WILL LEAVE THE SITE THROUGH THE SIDE GATE ON SHELL OIL RD.
- IF THERE IS A BACK HAUL SCHEDULED THE TRUCK WILL LEAVE THE OFF LOAD/WASHOUT AREA, EXIT AT THE NEARBY SOUTHEAST SHELL ROAD GATE, RE-ENTER AT SOUTHWEST GATE & MOVE TO THE LOADING AREAS FOR O&G OR INDUSTRIAL WASTE. ONCE REFILLED, TRUCKS WILL LEAVE OUT THE SOUTHEAST GATE ON SHELL OIL RD.

BACKHAUL:

- THE SITE WILL ALSO WORK WITH INDEPENDENT CONTRACTORS FOR BACK-HAULING. WHEN THE INCOMING LOAD IS SCHEDULED THE TRANSPORTER WILL ALSO BE IDENTIFIED AS A POTENTIAL BACK HAUL OPPORTUNITY. THE RECEIVING MANAGER WILL COORDINATE WITH THE TRANSPORTER AND THE SITE TO IDENTIFY ALL BACK HAUL TRUCKS.
- DEPENDING ON NEED THE SITE WILL SCHEDULE A BACK HAUL AFTER THE LOAD IS RECEIVED AND WASHED OUT.
- IN MOST CASES THE BACK HAUL OPERATORS WILL NOT BE OWNED BY THE APPLICANT.
- DEPENDING ON MATERIAL TO BE BACKED HAULED THE LOADING STATIONS ARE IDENTIFIED ON THE SITE PLAN. ONCE THE TRUCKS ARE LOADED THEY WILL BE SCHEDULED TO OUT BOUND FACILITY, TYPICALLY THIS WILL HAPPEN WITHIN THE SAME DAY.
- THERE WILL BE NO BACKHAUL FOR THE DOMESTIC LOADS COMING IN, THIS MATERIAL WILL BE CONSOLIDATED FROM THE SMALLER TRUCKS AND SENT OUT IN A LARGER TANKER TRUCK.

30 0 30 60
SCALE OF FEET

APPLICANT:
RI-NU SERVICES LLC.
15218 SUMMIT AVE., SUITE 300
#601 FONTANA, CA 92336
P:(951)-323-7200

PROPERTY OWNER:
SANTA CLARA WASTE WATER CO.
2775 NORTH VENTURA RD.
SUITE 209
OXNARD, CA 93036
P:(909)-641-4418

APN: 099-0-060-565 :	ACRE 6.97
TOTAL:	6.97

ENGINEER:
SESPE CONSULTING INC.
ROB DAL FARRA
374 POLI ST.
SUITE 200
VENTURA, CA 93001
P:805-275-1515

TOTAL PARCEL AREA	= 303,613 SQF
CUP AREA	= 274,655 SQF
NET STRUCTURE COVERAGE	= 27,211 SQF OR 9.0%
PERVIOUS AREA WITHIN CUP	= 138,902 SQF OR 50.6%
IMPERVIOUS AREA WITHIN CUP	= 135,753 SQF OR 49.4%
LANDSCAPE AREA WITHIN CUP	= 26,862 SQF OR 9.8%

PROJECT SITE ADDRESS: 815 MISSION ROCK RD, SANTA PAULA, CA

SESPE CONSULTING, INC.
374 Poli Street, Ste. 200 • Ventura, CA 93001
(805) 275-1515 • www.sespeconsulting.com

RI-NU WASTE WATER TREATMENT FACILITY
QUEUING PLAN

SCALE: HORZ. AS SHOWN
VERT. AS SHOWN
DRAWN BY: G.CAMUS
DATE: 03/29/2021

ri→nu Services, LLC.

FIGURE NUMBER 1

S:\GR10 – Green Compass\CUP Application 2016 – SCWW\CAD\Site Plan\GR10 –RI–NU–Site–Plan–05–12–21_Transportation.dwg May 12, 2021, 3:36pm GJC

Attachment C
Attendance Sign-In Sheets

Process Hazard Analysis
Daily Sign-In Sheet

Ri-Nu

Date: November 27-~~28~~29, 2018

Process: Ri-Nu Waste Water Treatment Facility

Name	Job Title/Expertise	Contact Info (phone or email)
Leo Old	EnSafe / Facilitator	lold@ensafe.com
Glen Bianchi	EnSafe/Facilitator	gbianchi@ensafe.com
ROB DALFARRA	SESPE CONSULTING	rdalfarra@sespe.com
Bill Mitzel	CEO	wjmitzel@gmail.com
~~Jim~~ Tim Koziol	CEO	TIM.KOZIOL@RI-NU.COM

Process Hazard Analysis **Ri-Nu**
Daily Sign-In Sheet

Date: 28-Jan-21
Process: Waste Water Treatment (update to RMA)

Name	Job Title/Expertise	Contact Info (phone or email)
Leo Old	EnSafe, RMA Facilitator	lold@ensafe.com
Rob Dal Farra	SESPE Consulting, Engineer	rdalfarra@sespeconsulting.com

Process Hazard Analysis **Ri-Nu**
Daily Sign-In Sheet

Date: May 18-19, 2021
Process: Waste Water Treatment (update to RMA)

Name	Job Title/Expertise	Contact Info (phone or email)
Leo Old	EnSafe, RMA Facilitator	lold@ensafe.com
Rob Dal Farra	SESPE Consulting, Engineer	rdalfarra@sespeconsulting.com

Attachment D
Process Safety Information Checklist

Process Hazard Analysis
Availability of Documents

Process Safety Information (PSI)	Yes	No	N/A
Hazardous Chemical Information			
Safety data sheets	X		
Toxicity information	X		
Permissible exposure limits	X		
Physical data	X		
Corrosivity data	X		
Thermal and chemical stability data	X		
Hazardous effects of inadvertent mixing of different materials that could foreseeably occur		X	
Process Technology Information			
Process chemistry	X		
Maximum intended inventory	X		
Theory of operation	X		
Block flow diagram and/or process flow diagram	X		
Safe upper and lower limits for items such as temperatures, pressures, flows, or compositions		X	
Consequences of deviation regarding safe operating limits		X	
Process Equipment Information			
Piping and instrument diagrams	X		
Electrical classification drawings			X
Materials of construction		X	
Relief system design and design basis			X
Ventilation system design			X
Design codes and standards employed		X	
Safety systems (e.g., interlocks, detection systems, and suppression systems)	X		
Material and energy balances	X		

Attachment E
Risk-Ranking Matrix

Process Hazard Analysis
Risk Ranking Matrix

Likelihood

Category	Description
5	Multiple occurrences per year
4	Once per year
3	Once every 1-10 years
2	Once every 10-50 years
1	Unlikely during life of process

Severity

Category	Description
5	Fatality or permanent disability Release with major environmental impact
4	Lost-time or restricted-work injury/illness Release with community environmental impact
3	OSHA recordable injury/illness Release with facility-wide environmental impact
2	First aid injury Release with local environmental impact
1	No injury/illness Minor release with minimal environmental impact

Risk (Likelihood x Severity)

Severity	1	2	3	4	5
5	5	10	15	20	25
4	4	8	12	16	20
3	3	6	9	12	15
2	2	4	6	8	10
1	1	2	3	4	5

Likelihood

Action

Score	Controls
10-25	Unacceptable risk - controls required
5-9	Tolerable risk - controls optional
1-4	Minimal risk - no controls necessary

Attachment F
Process Hazard Analysis Worksheets

Process Hazard Analysis **RI-NU**
Waste Stream: Tank Bottoms **May 20, 2021**

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations ID #	Recommendations
Truck arrives onsite - off-specification from profile (pH, or Flashpoint) - pumped into system	Failure to follow procedure	(pH) No consequence	Waste acceptance procedure	1	2	2		
		(Flashpoint) Fire at unloading station	Static control and discharge devices (grounding truck at unloading)					
			Ventilation - active vapor control to GAC					
Pumping to waste water holding tank designated for tank bottoms via overhead piping - release from piping	Valve failure	Spill	Secondary containment	1	3	3		
	Equipment failure (piping)							
Pumping tank bottoms to holding tanks designated for other waste streams	Operator error	Undesirable reaction with no adverse consequence		1	3	3		
Overflow from holding tank	Operator error	Spill	Secondary containment	1	3	3		
			Operator/mechanic training					
Surge tank, after oil/water separator, overflows (salt water)	Equipment failure (pump or level control)	Vessel overflow	Level indicators	1	3	3		
			Secondary containment					
Truck (carrying waste) collision with fork truck or other vehicle on the property	Inattentive/distracted operator	Spill	Operator training (for truck and fork truck drivers)	1	3	3		
			Onsite Traffic Analysis and Queuing Plan identifies designated traffic routes onsite					
			Operating procedures - designated traffic flow routes for vehicles onsite					
			Grading onsite to prevent offsite runoff of spill					
			Accessible spill kit					
			Operator training (HAZWOPER-trained spill responders)					

Process Hazard Analysis **RI-NU**
Waste Stream: Drilling Mud **May 20, 2021**

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations ID #	Recommendations
Truck arrives onsite - off-specification from profile (pH) - pumped into system	Failure to follow procedure	Undesirable reaction with no adverse consequence	Waste acceptance procedure	1	2	2		
Pumping to mixing tank and centrifuge via overhead piping - release from piping	Valve failure	Spill	Overflow line from mixing tank to alternate mixing tank	1	3	3		
	Equipment failure (piping)		Secondary containment					
Release of (mixed) drilling mud from centrifuge or clarifier	Valve failure	Spill	Secondary containment	1	3	3		
	Equipment failure (piping)							
Truck (carrying waste) collision with fork truck or other vehicle on the property	Inattentive/distracted operator	Spill	Operator training (for truck and fork truck drivers)	1	3	3		
			Onsite Traffic Analysis and Queuing Plan identifies designated traffic routes onsite					
			Operating procedures - designated traffic flow routes for vehicles onsite					
			Grading onsite to prevent offsite runoff of spill					
			Accessible spill kit					
			Operator training (HAZWOPER-trained spill responders)					

Process Hazard Analysis **RI-NU**
Waste Stream: Production Water **May 20, 2021**

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations ID #	Recommendations
Truck arrives onsite with off-specification water from profile - pumped into system	Failure to follow procedure	No consequence	Waste acceptance procedure	1	2	2		
Pumping to holding tank via overhead piping - release from piping	Valve failure	Spill	Overflow line from mixing tank to another mixing tank	1	3	3		
	Equipment failure (piping)		Secondary containment					
Pumping production water to holding tanks designated for other waste streams	Operator error	No consequence		1	3	3		
Production waste water to GEM Unit with in-line chemical addition for pH adjustment (H2SO4, NaOH) and via .25" polyethylene line. Excess chemical addition	Equipment failure (flow meter)	Other - pH too high or too low - GEM unit process disruption	Preventive maintenance/inspection program (per shift calibration of pH and flow meters)	1	2	2		
	Equipment failure (pH meter)		Critical spare parts inventory					
	Equipment failure (PLC)							
220-330 gal. totes of H2SO4, NaOH totes feed via .25" polyethylene line. Leak from tote, pump or piping	Valve failure	Spill	Secondary containment (segregated) for totes	1	3	3	N3-1	Consider use of double-walled tubing for acid and other chemical transfers.
	Equipment failure (structural)	Process disruption	Secondary containment (area) for feed lines					
	Other - polyethylene tubing failure	Employee exposure	Respiratory protection/PPE					
			Emergency eyewash and shower equipment					
Transfer/replace 220-330 gal. totes of H2SO4, NaOH, polymer and FeClO3 via fork truck. Damage to tote resulting in release of some or all of the tote contents.	Operator error	Spill	Secondary containment for most of the area	2	2	4	N3-2	Consider most optimal design of chemical feed areas to promote easy access by fork trucks and minimize opportunities for collisions with process equipment and chemical totes.
	Inattentive/distracted operator		Operator/mechanic training (forklift certified)					
			Respiratory protection/PPE					
			Emergency eyewash and shower equipment					
			DOT specification totes					
230 -330 gal. totes of polymer and FeClO3 feed via .25" polyethylene line. Leak from tote, pump or piping	Valve failure	Spill	Secondary containment (segregated) for totes	1	3	3	N3-3	(same as N3-1)
	Equipment failure (structural)	Process disruption	Secondary containment (area) for feed lines					
	Other - polyethylene tubing failure	Employee exposure	Respiratory protection/PPE					
			Emergency eyewash and shower equipment					
Process flow from GEM unit, to surge tank to Ozone Unit to final effluent tanks.	Valve failure	Spill	Secondary containment (partial)	1	2	3		
	Equipment failure (structural)	Process disruption						
Truck (carrying waste) collision with fork truck or other vehicle on the property	Inattentive/distracted operator	Spill	Operator training (for truck and fork truck drivers)	1	3	3		
			On-Site Traffic Analysis and Queuing Plan identifies designated traffic routes onsite					
			Operating procedures - designated traffic flow routes for vehicles onsite					
			Grading onsite to prevent offsite runoff of spill					
			Accessible spill kit					
			Operator training (HAZWOPER-trained spill responders)					

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations ID #	Recommendations
Truck arrives onsite - off-specification from profile --- pumped into system	Failure to follow procedure	No consequence	Waste acceptance procedure	1	2	2		
Pumping to holding tank via overhead piping - release from piping	Valve failure	Spill	Overflow line from mixing tank to another mixing tank	1	3	3		
	Equipment failure (piping)		Secondary containment					
Pumping Subcat. A water to holding tanks designated for other waste streams	Operator error	Undesirable reaction with no adverse consequence		1	3	3		
Subcat. A waste water to Clarifier with in-line chemical addition for pH adjustment (NaOH) and via .25" polyethylene line. Excess chemical addition	Equipment failure (flow meter)	Other pH too high, flocculation process disruption	Preventive maintenance/inspection program (per shift calibration of pH and flow meters)	1	2	2		
	Equipment failure (pH meter)		Critical spare parts inventory					
	Equipment failure (PLC)							
220-330 gal. totes of NaOH, polymer tote feed via .25" polyethylene line. Leak from tote, pump or piping	Valve failure	Spill	Secondary containment (segregated) for tote	1	3	3		
	Equipment failure (structural)	Process disruption	Secondary containment (area) for feed lines					
			Respiratory protection/PPE					
			Emergency eyewash and shower equipment					
Transfer/replace 220-330 gal. totes of NaOH, polymer and via fork truck. Damage to tote resulting in release of some or all of the tote contents.	Operator error	Spill	Secondary containment for most of the area	2	2	4	N4-1	(Same as N3-2)
	Inattentive/distracted operator		Operator/mechanic training (forklift certified)					
			Respiratory protection/PPE					
			Emergency eyewash and shower equipment					
			DOT specification totes					
Process flow from Clarifier unit, through filters and GAC to final effluent tanks.	Valve failure	Spill	Secondary containment (partial)	1	2	2		
	Equipment failure (structural)	Process disruption						
Truck (carrying waste) collision with fork truck or other vehicle on the property	Inattentive/distracted operator	Spill	Operator training (for truck and fork truck drivers)	1	3	3		
			Onsite Traffic Analysis and Queuing Plan identifies designated traffic routes onsite					
			Operating procedures - designated traffic flow routes for vehicles onsite					
			Grading onsite to prevent offsite runoff of spill					
			Accessible spill kit					
			Operator training (HAZWOPER-trained spill responders)					

Process Hazard Analysis **RI-NU**
Waste Stream: Subcategory C - Organics **May 20, 2021**

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations ID #	Recommendations
Truck arrives onsite - off-specification from profile --- pumped into system	Failure to follow procedure	No consequence	Waste acceptance procedure	1	2	2		
Pumping to holding tank via overhead piping - release from piping	Valve failure	Spill	Overflow line from mixing tank to another mixing tank	1	3	3		
	Equipment failure (piping)		Secondary containment					
Pumping Subcat. C water to holding tanks designated for other waste streams	Operator error	Undesirable reaction with no adverse consequence		1	3	3		
Subcat. C waste water to Clarifier - excessive flow	Equipment failure (flow meter)	Other - pH too high, flocculation process disruption	Preventive maintenance/inspection program (per shift calibration of pH and flow meters)	1	2	2		
	Equipment failure (PLC)		Critical spare parts inventory					
Process flow from Clarifier unit, through Oxone unit, filters and GAC to final effluent tanks - release from piping or equipment	Valve failure	Spill	Secondary containment (partial)	1	2	2		
	Equipment failure (structural)	Process disruption						
Final effluent storage tanks with in-line chemical addition for pH adjustment (NaOH) via .25" polyethylene line. Excess chemical addition	Equipment failure (flow meter)	Other pH too high or too low - Compliance with permit	Preventive maintenance/inspection program (per shift calibration of pH and flow meters)	1	2	2		
	Equipment failure (pH meter)		Critical spare parts inventory					
	Equipment failure (PLC)							
Shipping Pit - Insufficient NaHClO3 injection	Equipment failure (ORP meter)	Other - ORP too high (Compliance)	Preventive maintenance/inspection program (per shift calibration of ORP meters)	1	2	2		
			Critical spare parts inventory					
			Preventive maintenance/inspection program- weekly inspection of					
Truck (carrying waste) collision with fork truck or other vehicle on the property	Inattentive/distracted operator	Spill	Operator training (for truck and fork truck drivers)	1	3	3		
			On-Site Traffic Analysis and Queuing Plan identifies designated traffic routes onsite					
			Operating procedures - designated traffic flow routes for vehicles onsite					
			Grading onsite to prevent offsite runoff of spill					
			Accessible spill kit					
			Operator training (HAZWOPER-trained spill responders)					

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations ID #	Recommendations
Pumping to mixing tank and centrifuge via overhead piping - release from piping	Valve failure	Spill	Overflow line from mixing tank to another mixing tank	1	3	3		
	Equipment failure (piping)		Secondary containment					
Pumping domestic waste water to equalization tanks designated for domestic waste streams - release from piping	Valve failure	Spill	Secondary containment	1	3	3		
	Equipment failure (piping)							
Water pumped from equalization tank to shipping pit - release from piping	Valve failure	Spill	Secondary containment	1	3	3		
	Equipment failure (piping)							
Truck (carrying waste) collision with fork truck or other vehicle on the property	Inattentive/distracted operator	Spill	Operator training (for truck and fork truck drivers)	1	3	3		
			On-Site Traffic Analysis and Queuing Plan identifies designated traffic routes onsite					
			Operating procedures - designated traffic flow routes for vehicles onsite					
			Grading onsite to prevent offsite runoff of spill					
			Accessible spill kit					
			Operator training (HAZWOPER-trained spill responders)					

Process Hazard Analysis **RI-NU**
Node: Utilities **May 20, 2021**

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations	
							ID #	
Loss of HVAC	Not applicable							
Loss of electrical	Natural (weather, earthquake)	Process disruption (all flows stop)		1	3	3		
Loss of heating	Not applicable							
Loss of cooling	Not applicable							
Loss of lighting	Natural (weather, earthquake) (Loss of	Process disruption		1	3	3		
Loss of instrument air	Not applicable							
Loss of nitrogen	Not applicable							
Loss of fire suppress.	Other - City control	No consequence						
Loss of potable water	Other - City control	Process disruption (loss of plumbed emergency eyewash/showers)	Portable eyewash/shower units available for rental	1	2	2		

Process Hazard Analysis **RI-NU**

Waste Stream: Hazardous Materials Storage **May 20, 2021**

Deviation/Hazard Scenario	Causes	Consequences	Safeguards	S	L	R	Recommendations ID #	Recommendations
Truck unloading of 220-330 gal. totes of H2SO4, NaOH, FeClO3, polymer and NaHClO3 to storage area. Spill during unloading with forklift	Operator error	Spill	Secondary containment	2	2	4	N8-1	Establish designated path for trucks to deliver totes to hazardous material storage locker/building. Design should minimize amount of handling necessary to unload/store totes. (May 2021 update: On-Site Traffic Analysis and Queuing Plan developed May 2021)
	Inattentive/distracted operator		Operator/mechanic training (Certified forklift operators)					
			Accessible spill kit					
			Emergency eyewash and shower equipment					
			Operator/mechanic training (HAZWOPER-trained spill responders)					
			DOT Specification totes					
Storage of 220-330 gal. totes of H2SO4, NaOH, FeClO3, polymer and NaHClO3, in the storage locker/building. Spill within the storage locker/building	Valve failure	Spill	Secondary containment (segregated)	1	2	2	N8-2	Hazardous material storage locker/building shall meet local/state chemical storage and fire protection safety requirements.
	Equipment failure		Accessible spill kit					
			Emergency eyewash and shower equipment					
			Operator/mechanic training (HAZWOPER-trained spill responders)					
			DOT Specification totes					
Inadvertent pumping of hazardous chemical (e.g., H2SO4, NAOH, NaHClO3, NaClO2, H2O2) into a vac truck containing waste water	Operator error	Explosion	Operating policy/procedures - waste material in totes or drums are not accepted	4	1	4	N8-3	Verify O&M Manual clearly describes policies regarding (1) wastes in drums or totes will not be accepted and (2) prohibition of pumping drums or totes into a vacuum truck.
	Failure to follow procedure	Undesirable reaction	Operating policy/procedures - prohibition of pumping drums or totes into any vac truck				N8-4	Implement a "New Chemical" policy to address pre-approval process, purchasing, use, storage, training, and other appropriate safety precautions.
		Spill	Operator/mechanic training					
Truck (carrying hazardous materials) collision with fork truck or other vehicle on the property	Inattentive/distracted operator	Spill	Operator training (for truck and fork truck drivers)	4	1	4		
			On-Site Traffic Analysis and Queuing Plan identifies designated traffic routes onsite					
			Operating procedures - designated traffic flow routes for vehicles onsite. When hazmat deliveries occur, all other truck traffic is frozen onsite until hazmat truck departs facility					
			Grading onsite to prevent offsite runoff of spill					
			Accessible spill kit					
			Operator training (HAZWOPER-trained spill responders)					

	Issue	Y/N/NA	Existing Safeguards	S	L	R	Recommendations ID#	Recommendations
Facility Siting								
Hazards Caused by the Location of the Process								
S01	Are adjacent non-process areas protected from process hazards and/or releases/spills?	Y	Office area is located as far from the process area as physically possible. Site grading contains releases to localized areas					
S02	Are unauthorized employees, visitors and contractors prevented from entering process areas?	Y	Fenced gated property, sign in log, documented safety orientation for drivers					
S03	Can emergency escape be accomplished without encountering significant process hazards?	Y	3 exit points on 2 sides of the property, all processes outdoors					
S04	Are control rooms located to minimize exposure to process hazards for its occupants?	NA						
S05	Are pressure relief and blowdown vents designed to discharge away from occupied areas?	NA						
S06	Have potential risks associated with exposures to explosion hazards been determined and addressed?	Y	No anticipated process related explosion hazards. Prior incident reviewed and preventive measures implemented.					
S07	Are outdoor air intakes to occupied areas properly located to minimize uptake of hazardous gases/vapors?	NA						
S08	Has a process been established to identify safe locations for contractor staging, fabrication, and storage areas (especially during process outages/shutdowns)?	Y	Construction during operation not expected; however, contractor work area would be designated.					
Locations of Emergency Response Equipment and Detectors								
S09	Are process controls and indicators accessible under normal, upset, and emergency conditions?	NA	Only process controls are pH, flow and ORP; none are critical					
S10	Are gas/vapor detectors located in the most appropriate locations?	Y	Personal H2S monitors					
S11	Are fire/smoke detectors located in the most appropriate locations?	NA	All operations are outdoors. Not required for lab or offices based on size/occupancy.					
S12	Is fire-fighting equipment, including fire extinguishers and suppressions systems, in the most appropriate locations?	Y	Fire extinguishers (number and placement) to be specified by Fire Marshal					
S13	If required, is accessibility to emergency escape respirators provided?	NA						
Severe Weather and Natural Disasters								
S14	Does process equipment and structural components meet current seismic codes?	NA	Tank, process equipment, and portable building installations are not subject to seismic codes. Will be reviewed during permitting.					
S15	Are process equipment and controls protected from damage and/or release during severe weather or natural disasters?	NA	No critical process controls. Will be reviewed during permitting.					
S16	Does the process have adequate lightning protection?	NA	Requirement not currently anticipated. Will be reviewed during permitting.					
Release from Adjacent Facilities								
S17	Is the covered process isolated from neighboring facilities to prevent damage that could result in a release of hazardous materials?	NA	Adjacent facilities do not have highly hazardous operations.					
Security								
S18	Is the covered process adequately secured to prevent unauthorized access? (e.g., gates, locked doors, security cameras, fencing, and security guards)	Y	Fenced gated access, security cameras.					
Other								
S19	Are local Emergency Response personnel familiar with site operations and hazards?	N		4	2	8	N9-1	Establish program to familiarize local responders with site operations and hazards. Program should include periodic site visits by responders and joint participation in emergency drills.

	Issue	Y/N/NA	Existing Safeguards	S	L	R	Recommendations ID#	Recommendations
Human Factors								
General Work Environment								
H01	Are adequate hazard warning signs posted in appropriate areas and legible?	Y	No tanks contain hazardous materials requiring signage. NFPA hazard rating diamonds and other signage will be posted at entry gates				N9-2	Provide appropriate hazard warning signage at entrances to hazardous materials storage building/locker.
H02	Are alarms loud enough to be heard?	NA						
H03	Is the lighting sufficient for safe operation of the covered process?	Y	Lighting plan will be reviewed/approved by County.					
H04	Are emergency exit signs placed in appropriate locations?	Y						
Accessibility and Availability of Equipment								
H05	Is personal protective equipment readily available and are employees aware of their locations?	Y	Documented PPE hazard assessments. PPE training					
H06	Is portable or fixed communications equipment available for personnel working in process areas?	NA	Cellphones available to contact emergency responders, if needed.					
H07	Would others know that a worker is incapacitated in a process area in a timely manner?	Y	No employees working alone during shift					
H08	Is process equipment designed and positioned to allow maintenance and servicing?	Y						
Component Labeling								
H09	Is process equipment (e.g., containers, pipes, valves, instruments, controls) clearly labeled or otherwise readily identifiable?	Y	Equipment labeling to be implemented with facility construction				N9-3	Provide appropriate signage/stenciling to clearly identify waste unloading valves/piping in truck unloading area.
H10	Are process instruments and controls clearly labeled and accurate?	Y	Only process controls are pH, flow and ORP. To be implemented with facility construction.					
Controls and Displays								
H11	Is adequate information about normal and upset process conditions displayed?	Y	Only process controls are pH, flow and ORP. Process upsets do not result in adverse incidents.					
H12	Are the controls and displays arranged logically in ways that operators can understand?	Y						
H13	Are critical alarms separate and distinguishable from control alarms?	NA	No critical or control alarms					
H14	Have operators been trained to understand the meaning of critical and control alarms?	NA						
H15	Are alarms uniformly distinguishable (e.g., toxic gas alarms have same audible and/or visible cues)?	NA						
H16	Is there a procedure in place to prevent unauthorized changes to critical process parameters?	NA	No critical process controls.					
H17	Are dedicated emergency shutdown devices for critical process equipment located appropriately?	NA						
H18	For upset conditions, does the operator have adequate time to act as necessary to control the situation?	NA	No critical upset conditions anticipated					
Workload and Stress Factors								
H19	Is the duration of a normal operating shift appropriate based on alertness and fatigue concerns?	Y	8 hour shifts					
H20	Is there a procedure in place to ensure adequate staffing at process controls (e.g., provision for operator(s) at controls at all times)?	NA	No critical process controls.					
H21	Are policies in place to prevent an operator from working excessive hours if their relief fails to arrive?	Y						

	Issue	Y/N/NA	Existing Safeguards	S	L	R	Recommendations	
							ID#	
Operating Procedures and Training								
H22	Do adequate standard operating procedures, job safety assessments, and/or work instructions exist to guide operators to run the process safely under normal, temporary, and emergency conditions?	Y	Job descriptions and training exist for all positions. Key documents include Employee Safety Manual, O&M Manual, Waste Analysis Plan. 5 mph speed limit onsite. Traffic Queuing Plan. Receiving manager and north gate attendant to direct traffic.					
H23	Have operators received adequate training (classroom and hands-on) and demonstrated proficiency to operate the process safely under normal, temporary, and emergency conditions?	Y	Training program for all operators, addressing operations, safety, emergency response.				N9-4	Review existing job descriptions and hiring process. Revise as necessary to ensure that qualified employees with appropriate experience, knowledge, and physical capabilities are hired in order to maintain safety standards.
Mechanical Integrity								
H24	Is a reliable system in place for PSM-related work orders, preventative maintenance tasks, emergency repairs, etc. for mechanics to adequately maintain/repair process equipment and controls?	Y	Some PM processes are not documented. Process monitoring /calibration is documented.					
H25	Have mechanics received adequate training (classroom and hands-on) and demonstrated proficiency to perform preventive and repair maintenance of process equipment and controls?	Y	Training program for all operators, addressing operations, safety, emergency response.					

Attachment G
Summary of Controls and Safeguards

Process Hazard Analysis **RI-NU**

Summary of Controls and Safeguards **May 20, 2021**

#	Node	Engineering Controls or Other Safeguard
1	N1 - Tank Bottoms	Waste acceptance procedure
2	N1 - Tank Bottoms	Static control and discharge devices (grounding truck at unloading)
3	N1 - Tank Bottoms	Ventilation - active vapor control to GAC
4	N1 - Tank Bottoms	Secondary containment (unloading area, tank farm, surge tank)
5	N1 - Tank Bottoms	Operator/mechanic training regarding operating procedures
6	N1 - Tank Bottoms	Surge tank level indicators
7	N1 - Tank Bottoms	Operator training (for truck and fork truck drivers)
8	N1 - Tank Bottoms	Operating procedures - designated traffic flow routes for vehicles onsite
9	N1 - Tank Bottoms	Grading onsite to prevent offsite runoff of spill
10	N1 - Tank Bottoms	Accessible spill kit
11	N1 - Tank Bottoms	Operator training (HAZWOPER-trained spill responders)
12	N2 - Drilling Mud	Waste acceptance procedure
13	N2 - Drilling Mud	Overflow line from mixing tank to alternate mixing tank
14	N2 - Drilling Mud	Secondary containment (mixing tank, centrifuge, clarifier)
15	N2 - Drilling Mud	Operator training (for truck and fork truck drivers)
16	N2 - Drilling Mud	Operating procedures - designated traffic flow routes for vehicles onsite
17	N2 - Drilling Mud	Grading onsite to prevent offsite runoff of spill
18	N2 - Drilling Mud	Accessible spill kit
19	N2 - Drilling Mud	Operator training (HAZWOPER-trained spill responders)
20	N3 - Production Water	Waste acceptance procedure
21	N3 - Production Water	Overflow line from mixing tank to alternate mixing tank
22	N3 - Production Water	Secondary containment (unloading area, holding tanks, chemical totes, chemical feed lines, GEM unit, surge tank, ozone tank, GAC vessels, final effluent tanks)
23	N3 - Production Water	Preventive maintenance (calibration) program for pH and flow meters
24	N3 - Production Water	Critical spare parts inventory
25	N3 - Production Water	Segregated chemical tote storage area
26	N3 - Production Water	Respirators and protective clothing for chemical tote handling
27	N3 - Production Water	Emergency eyewash and shower equipment
28	N3 - Production Water	Fork truck driver certification program
29	N3 - Production Water	DOT specification totes for chemicals
30	N3 - Production Water	Operator training (for truck and fork truck drivers)
31	N3 - Production Water	Operating procedures - designated traffic flow routes for vehicles onsite
32	N3 - Production Water	Grading onsite to prevent offsite runoff of spill
33	N3 - Production Water	Accessible spill kit
34	N3 - Production Water	Operator training (HAZWOPER-trained spill responders)
35	N4 - Subcategory A	Waste acceptance procedure
36	N4 - Subcategory A	Overflow line from mixing tank to alternate mixing tank
37	N4 - Subcategory A	Secondary containment (unloading area, holding tank, chemical totes, chemical feed lines, GEM unit, surge tank, final effluent tanks)
38	N4 - Subcategory A	Preventive maintenance (calibration) program for pH and flow meters
39	N4 - Subcategory A	Critical spare parts inventory
40	N4 - Subcategory A	Segregated chemical tote storage area
41	N4 - Subcategory A	Respirators and protective clothing for chemical tote handling
42	N4 - Subcategory A	Emergency eyewash and shower equipment
43	N4 - Subcategory A	Fork truck driver certification program
44	N4 - Subcategory A	DOT specification totes for chemicals
45	N4 - Subcategory A	Operator training (for truck and fork truck drivers)
46	N4 - Subcategory A	Operating procedures - designated traffic flow routes for vehicles onsite
47	N4 - Subcategory A	Grading onsite to prevent offsite runoff of spill
48	N4 - Subcategory A	Accessible spill kit
49	N4 - Subcategory A	Operator training (HAZWOPER-trained spill responders)
50	N5 - Subcategory C	Waste acceptance procedure
51	N5 - Subcategory C	Overflow line from mixing tank to alternate mixing tank
52	N5 - Subcategory C	Secondary containment (unloading area, holding tank, clarifier unit, ozone tank, GAC vessels, final effluent tanks)
53	N5 - Subcategory C	Preventive maintenance (calibration) program for pH, flow, and ORP meters
54	N5 - Subcategory C	Critical spare parts inventory

#	Node	Engineering Controls or Other Safeguard
55	N5 - Subcategory C	Operator training (for truck and fork truck drivers)
56	N5 - Subcategory C	Operating procedures - designated traffic flow routes for vehicles onsite
57	N5 - Subcategory C	Grading onsite to prevent offsite runoff of spill
58	N5 - Subcategory C	Accessible spill kit
59	N5 - Subcategory C	Operator training (HAZWOPER-trained spill responders)
60	N6 - Domestic Waste Water	Overflow line from mixing tank to alternate mixing tank
61	N6 - Domestic Waste Water	Secondary containment (unloading area, mixing tank, equalization tank)
62	N6 - Domestic Waste Water	Operator training (for truck and fork truck drivers)
63	N6 - Domestic Waste Water	Operating procedures - designated traffic flow routes for vehicles onsite
64	N6 - Domestic Waste Water	Grading onsite to prevent offsite runoff of spill
65	N6 - Domestic Waste Water	Accessible spill kit
66	N6 - Domestic Waste Water	Operator training (HAZWOPER-trained spill responders)
67	N7 - Utilities	Portable eyewash/shower units available for rental
68	N8 - Hazardous Material Storage	Secondary containment (hazardous material storage building)
69	N8 - Hazardous Material Storage	Fork truck driver certification program
70	N8 - Hazardous Material Storage	Accessible spill kit
71	N8 - Hazardous Material Storage	Emergency eyewash and shower equipment
72	N8 - Hazardous Material Storage	HAZWOPER-trained hazardous material spill responders
73	N8 - Hazardous Material Storage	DOT specification totes for chemicals
74	N8 - Hazardous Material Storage	Segregated chemical storage areas designated in building
75	N8 - Hazardous Material Storage	Procedure prohibiting acceptance of waste material in totes or drums
76	N8 - Hazardous Material Storage	Procedure prohibiting of pumping drums or totes into any vacuum truck
77	N8 - Hazardous Material Storage	Operator training regarding procedures
78	N9 - Human Factors and Facility Siting	Fenced, gated property
79	N9 - Human Factors and Facility Siting	Sign-in procedure for truck drivers
80	N9 - Human Factors and Facility Siting	Truck driver safety orientation program
81	N9 - Human Factors and Facility Siting	Multiple property exits
82	N9 - Human Factors and Facility Siting	Personal hydrogen sulfide gas detectors carried by employees
83	N9 - Human Factors and Facility Siting	Fire extinguishers throughout property (as specified by Fire Marshal)
84	N9 - Human Factors and Facility Siting	Security cameras on site
85	N9 - Human Factors and Facility Siting	NFPA hazard rating signage at entrance gates
86	N9 - Human Factors and Facility Siting	Documented personal protective equipment hazard assessments
87	N9 - Human Factors and Facility Siting	Personal protective equipment training for employees
88	N9 - Human Factors and Facility Siting	Working alone prohibited
89	N9 - Human Factors and Facility Siting	Employee Safety Manual
90	N9 - Human Factors and Facility Siting	Operations and Maintenance Manual
91	N9 - Human Factors and Facility Siting	Waste Analysis Plan
92	N9 - Human Factors and Facility Siting	Training program for all operators, addressing operations, safety, emergency response
93	N9 - Human Factors and Facility Siting	Strict 5 mile per hour speed limit onsite for all vehicles
94	N9 - Human Factors and Facility Siting	Operational queuing plan to direct truck traffic
95	N9 - Human Factors and Facility Siting	Designated onsite receiving manager to coordinate truck traffic
96	N9 - Human Factors and Facility Siting	Attendant at north entrance to direct truck traffic arriving onsite
97	N9 - Human Factors and Facility Siting	Designated traffic paths to minimize potentials for collisions
98	N9 - Human Factors and Facility Siting	Designated (separate) waste and hazardous material truck delivery times

Attachment H
Summary of Recommendations

Process Hazard Analysis **RI-NU**

Summary of Recommendations **May 20, 2021**

ID#	Recommendation	Responsible Person	Estimated Completion Date	Actual Completion Date	Final Resolution	Risk Re-Ranking S	L	R
N3-1	Consider use of double-walled tubing for acid and other chemical transfers.							
N3-2	Consider most optimal design of chemical feed areas to promote easy access by fork trucks and minimize opportunities for collisions with process equipment and chemical totes.							
N8-1	Establish designated path for trucks to deliver totes to hazardous material storage locker/building. Design should minimize amount of handling necessary to unload/store totes. (May 2021 update: On-Site Traffic Analysis and Queuing Plan developed May 2021)							
N8-2	Hazardous material storage locker/building shall meet local/state chemical storage and fire protection safety requirements.							
N8-3	Verify O&M Manual clearly describes policies regarding (1) wastes in drums or totes will not be accepted and (2) prohibition of pumping drums or totes into a vacuum truck.							
N8-4	Implement a "New Chemical" policy to address pre-approval process, purchasing, use, storage, training, and other appropriate safety precautions.							
N9-1	Establish program to familiarize local responders with site operations and hazards. Program should include periodic site visits by responders and joint participation in emergency drills.							
N9-2	Provide appropriate hazard warning signage at entrances to hazardous materials storage building/locker.							
N9-3	Provide appropriate signage/stenciling to clearly identify waste unloading valves/piping in truck unloading area.							

SCWW

- Waste volumes by waste type come from totaling daily sales records for each month for each waste stream
- Number of delivered waste loads were calculated assuming a truck size based on the waste type
- Conservative assumptions were used - assumed every load was full
  - Domestic waste loads are 30 barrels (bbl.)
  - Solids waste loads are 20 tons.
  - All other waste loads are 120 barrels (bbl.)
- Loads per day were calculated using 6 days per week of waste delivery
- The facility was open accepting waste 45.6 weeks in 2014 and accepting waste 273.4 days

Days in 2014 facility was closed post incident:	46
Days open in 2014:	319
Weeks open in 2014:	45.6
Days accepting waste in 2014 (6 days/week):	273.4

2014 Incoming Waste Volume Summary by Month[1]

	Domestic (bbl.)	Industrial (bbl.)	Tank Bottoms (bbl.)	Drill Mud (bbl.)	Other O&G Liquids (bbl.)	Solids (tons)
January	8,225	86,632	11,770	12,395	21,879	1,093
February	7,344	31,630	12,384	14,016	52,104	733
March	9,345	32,556	19,728	14,657	75,471	998
April	9,502	38,400	14,329	15,960	84,744	2,198
May	9,150	29,017	8,444	19,945	80,488	3,749
June	9,570	26,035	7,970	24,217	86,684	2,813
July	13,458	30,061	6,569	39,281	64,174	2,907
August	11,343	28,173	6,244	29,471	90,647	3,274
September	12,300	27,922	5,121	41,460	67,564	3,095
October	9,728	25,742	4,252	37,591	47,813	4,270
November	3,924	14,699	2,276	23,648	38,312	1,663
December	closed	closed	closed	closed	closed	closed

1 - data supplied by C3 Capital

2014 Incoming Waste Truck Summary by Month (loads)

	Domestic	Industrial	Tank Bottoms	Drill Mud	Other O&G	Solids	Total Loads	Loads per Day
January	274	722	98	103	182	55	1,434	55.2
February	245	264	103	117	434	37	1,199	50.0
March	312	271	164	122	629	50	1,548	59.5
April	317	320	119	133	706	110	1,705	65.6
May	305	242	70	166	671	187	1,642	63.1
June	319	217	66	202	722	141	1,667	64.1
July	449	251	55	327	535	145	1,761	67.7
August	378	235	52	246	755	164	1,830	***70.4***
September	410	233	43	346	563	155	1,749	67.3
October	324	215	35	313	398	213	1,499	57.7
November	131	122	19	197	319	83	872	54.5
December								

Total Loads in 2014:	16,906
2014 annual daily average (for 273.4 days):	**61.8**
2014 max. month daily average:	**70.4**

NOTES:

- 2014 trucking numbers do not include supply deliveries or outgoing waste loads (C3 is searching their records to determine if that information is available)

ADT Analysis:

TRUCKS:		
Project proposed trucking:	500	loads/week
	1,000	trips/week
Proposed average daily trips:	166.7	ADT (based on 6 days/week)
Incoming daily loads from 2014 records:	61.8	loads/day
	124	ADT
Proposed ADT increase from 2014 actual:	**43.0**	ADT
EMPLOYEES:		
Baseline from previous SCWW application:	12	per day
	24	ADT
Project proposed employees:	40.0	per day
	80	ADT
Proposed employee ADT increase:	**56**	ADT
ADT increase (trucks + employees):	**99.0**	

COUNTY of VENTURA
RESOURCE MANAGEMENT AGENCY
DAVE WARD, AICP
Planning Director

TOPIC: Equivalency Determination for a Private Off-site Wastewater Treatment Facility known as Santa Clara Waste Water Treatment Facility located at 815 Mission Rock Road, unincorporated area of Santa Paula (Non-Coastal Zoning Ordinance Section 8105-5, Use Matrix)	ORIGINAL: March 17, 2021 REVISED: N/A	POLICIES AND INTERPRETATIONS POLICY NO. 2021-1 Dave Ward, AICP Director

TO: Planning Division Staff

FROM: Dave Ward, AICP
Planning Director

The Planning Director has the authority to interpret the regulations and standards in the Non-Coastal Zoning Ordinance (NCZO) pursuant to Section 8101-4.10 - Interpretation. In this case, there is an existing privately-owned off-site wastewater treatment facility (known as Santa Clara Waste Water Treatment Facility) that was established and approved in the 1950s, but there is currently no line item for this specific use in the use matrix of the NCZO. For this reason, a Planning Director equivalency determination is warranted.

Analysis

According to the proposed project description under Application No. PL15-0106, the Environmental Health Division has determined that the facility is considered a "Centralized Waste Treatment" facility (CWT) as set forth in the Code of Federal Regulations 40 CFR Part 437, which means "…*any facility that treats (for disposal, recycling or recovery of material) any hazardous or non-hazardous industrial wastes, hazardous or non-hazardous industrial wastewater, and/or used material received from off-site. 'CWT facility' includes both a facility that treats waste received exclusively from off-site and a facility that treats wastes generated on-site as well as waste received from off-site[…]."*(40 CFR Part §437.2(c)). The NZCO does not currently contain this specific use in the use matrix and, therefore, the Planning Director must determine the most equivalent use to the wastewater treatment facility as listed in the use matrix of the NCZO. The uses specifically listed under Wastewater/Sewage Treatment Facilities under NCZO section 8105-5 are:

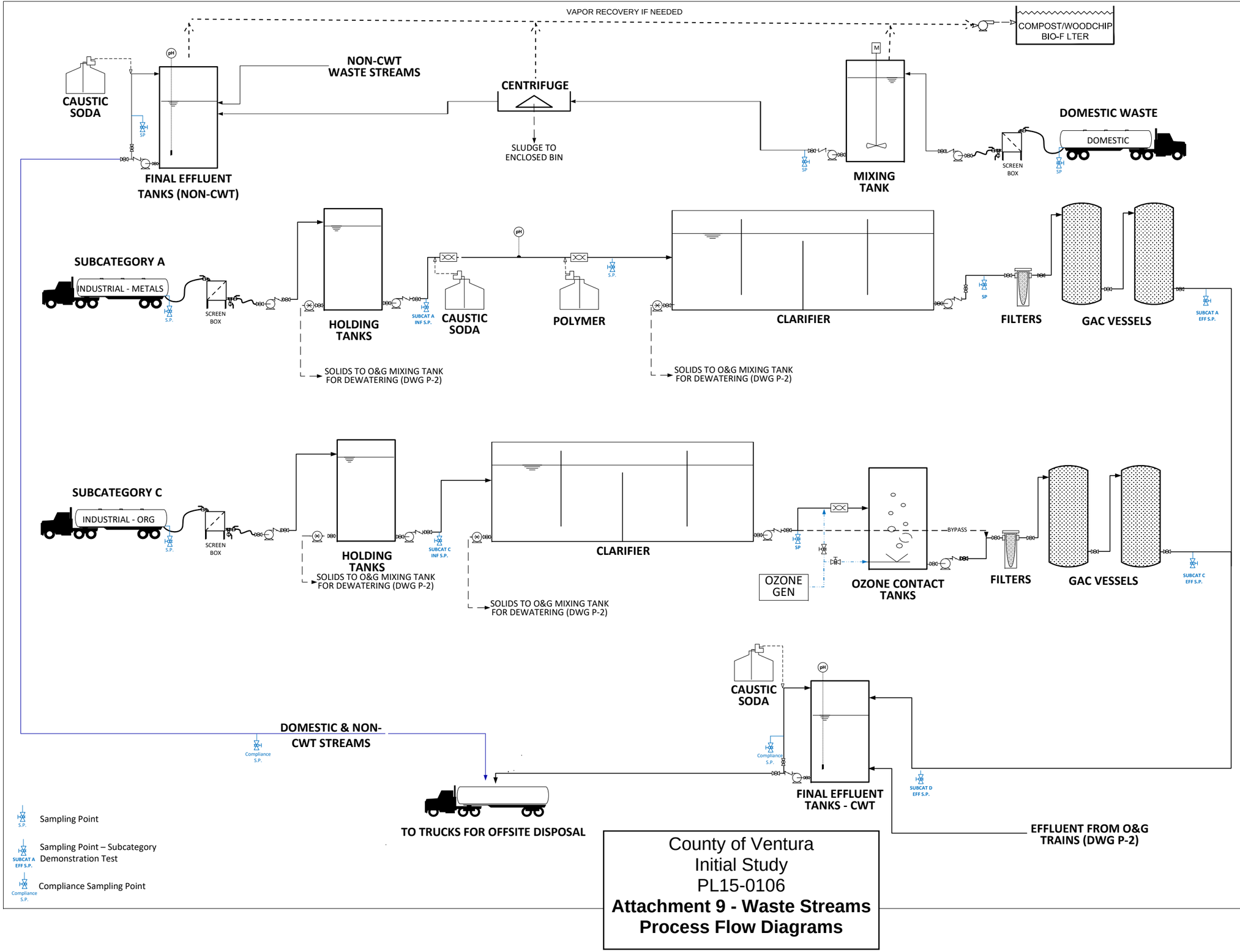
- Individual sewage disposal systems;
- On-site wastewater treatment facility; and,
- Community wastewater treatment facility.

Planning Director Determination

After reviewing the definitions of each of these terms and discussing them with the Environmental Health Division, the Planning Director finds that the most equivalent use to a CWT in the NCZO is a community wastewater treatment facility, which is defined as:

> *"A wastewater treatment plant that treats liquid waste which is received from off of the plant site. Such facilities include public agency-owned plants and privately-owned plants and may include accessory biosolids composting operations."*

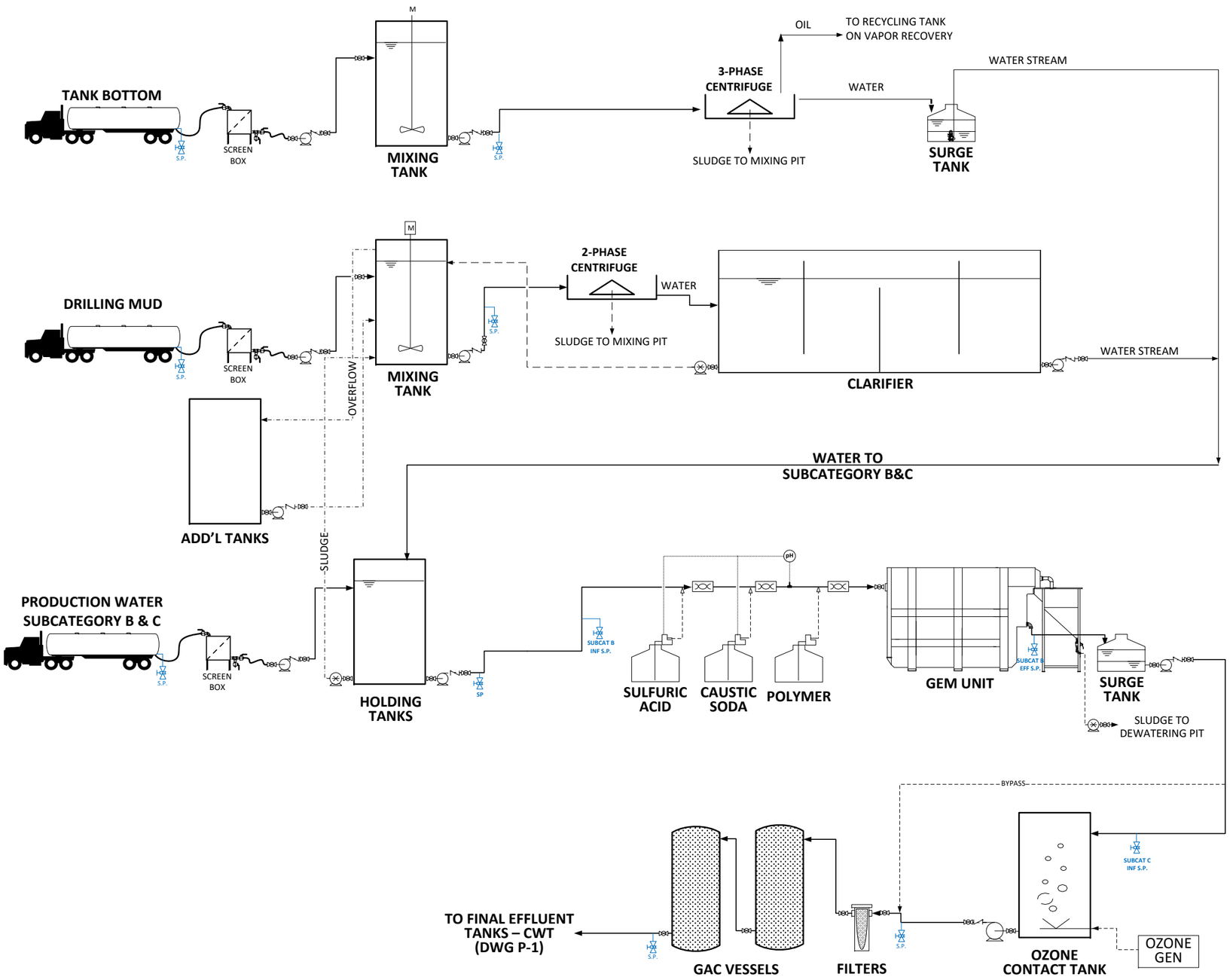
Section 8105-5 (use matrix) indicates that a community wastewater treatment facility in the General Industrial Zone (M3) requires a Board of Supervisors-approved Conditional Use Permit.



County of Ventura
Initial Study
PL15-0106
Attachment 9 - Waste Streams Process Flow Diagrams

INNOVATIVE TREATMENT
P.O. BOX 3970
FULLERTON, CA 92834
(714) 745-4692

TITLE	CWT & DOMESTIC WASTE TREATMENT FACILITY
DESCRIPTION	PIPING & INSTRUMENTATION DIAGRAM INDUSTRIAL & DOMESTIC WASTE TREATMENT TRAINS
SCALE	NONE
DESIGNED BY	AL
DRAWN BY	AL
DATE	4/5/18
DRAWING No.	P-1



S.P. Sampling Point

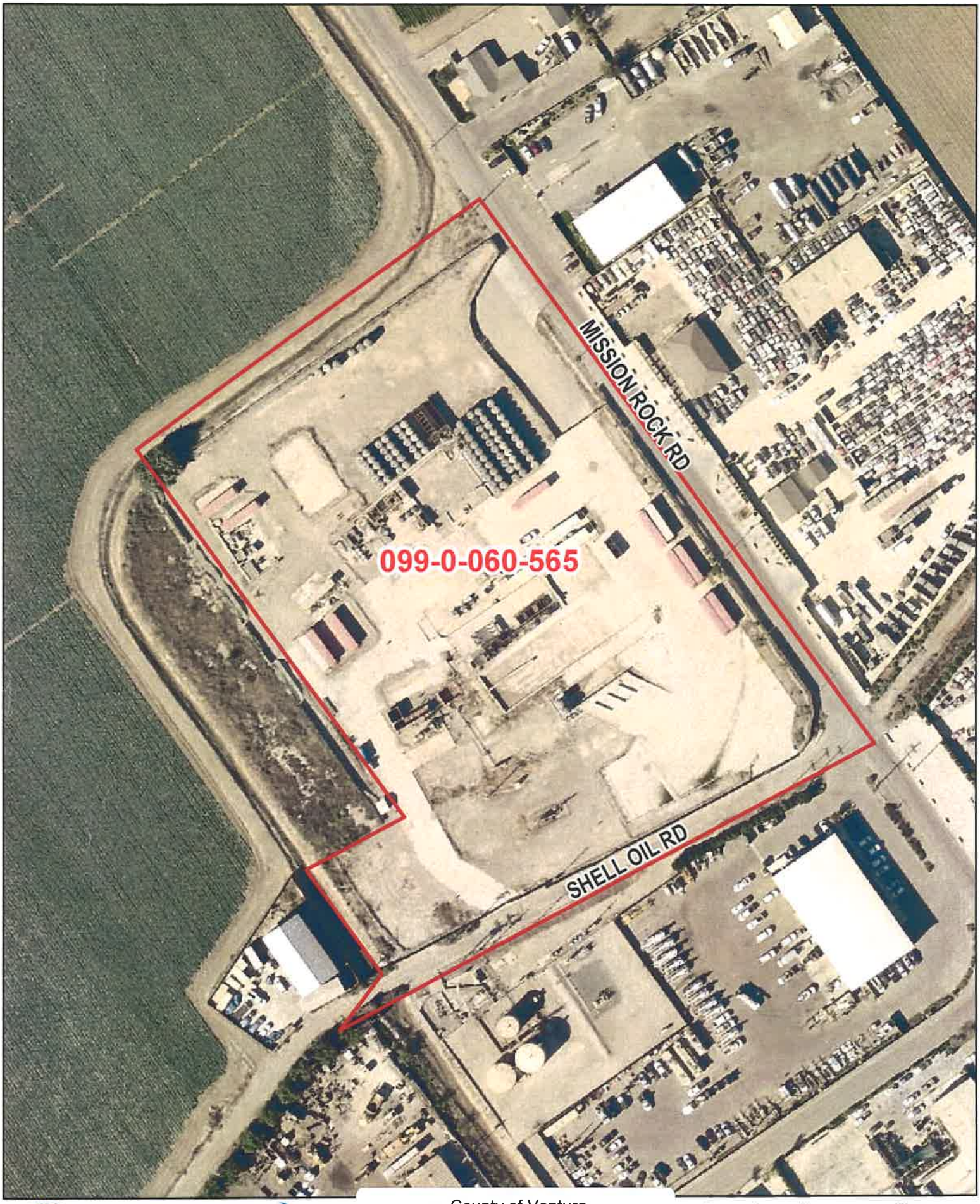
SUBCAT B INF S.P. Sampling Point – Subcategory Demonstration Test

Compliance S.P. Compliance Sampling Point

NOTE: SLUDGE PRODUCED IN THE DEWATERING PITS WILL BE DISPOSED AT A LOCAL LANDFILL

INNOTREAT INC.
INNOVATIVE TREATMENT
P.O. BOX 3970
FULLERTON, CA 92834
(714) 743-4692

TITLE	CWT & DOMESTIC WASTE TREATMENT FACILITY
DESCRIPTION	PIPING & INSTRUMENTATION DIAGRAM OIL & GAS TREATMENT TRAIN
DRAWING No.	P-2
SCALE	NONE
DESIGNED BY	AL
DRAWN BY	AL
DATE	4/5/18

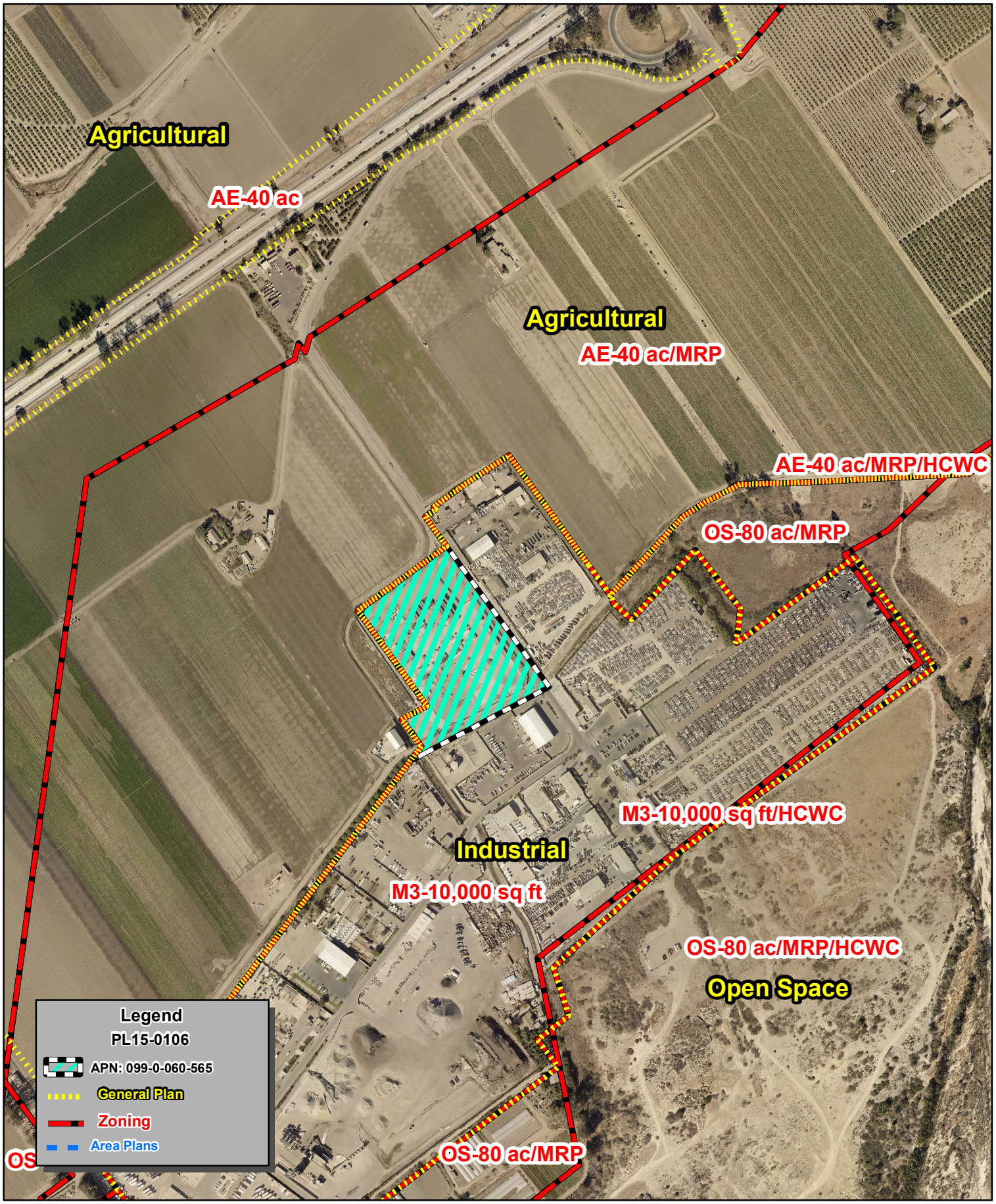


Ventura County
Resource Management Agency
Information Systems GIS Services
Map created on 02-21-2019
Source: Pictometry: Oct. 2018

RMAgis

County of Ventura
Initial Study
PL15-0106
Attachment 1 – 2019 Aerial Map of Project Site

0 50 100 200 Feet



Ventura County,California
Resource Management Agency
GIS Development & Mapping Services
Map Created on 06-24-2021
This aerial imagery is under the copyrights of Pictometry
Source: Pictometry, 2019

RMAgis

County of Ventura
Initial Study
PL15-0106
Attachment 2 - General Plan Land Use and Zoning Designation Map

0 230 460 Feet

Disclaimer: This Map was created by the Ventura County Resource Management Agency, Mapping Services - GIS which is designed and operated solely for the convenience of the County and related public agencies. The County does no twarrant the accuracy of this mapand no decision involving a risk of economic loss or physical injury should be made in reliance thereon.

N

RH

The Law Office of
Michael D. Bradbury

mbradbury@cowboylaw.com
(805) 861-0840

2244 East Ojai Avenue
Ojai, California 93023

February 27, 2015

Re: November 18, 2014 Incidents - Root Cause Investigatory Report

The following report is based on an internal investigation conducted by the Santa Clara Waste Water Company ("SCWW") regarding the above referenced incident, and is intended to be SCWW's response to inquiries from various regulatory, investigative and other governmental agencies having jurisdiction over or substantial interest in the matter. As more information is developed, this report will be updated and/or amended accordingly. The company's lawyers, Messrs. Barry Groveman and William Carter of the law firm Musick, Peeler and Garrett, LLC, are available to respond to any inquiries regarding this report to the extent possible, and can be contacted at the numbers and addresses listed below. As one of the principal investigators, acting under the direction of counsel for the company, any questions to me should be handled through Messrs. Groveman or Carter.

Please also be advised that a copy of this report was hand-delivered to the principal investigative agency handling this matter, namely, the Ventura County District Attorney's Office, on Tuesday, February 24, 2015.

INTRODUCTION:

Immediately after the explosion and subsequent fire that occurred on the premises of the Santa Clara Waste Water Company ("SCWW") facility located at 815 Mission Rock Road, Santa Paula, California (the "Facility") on November 18, 2014 (collectively referred to as the "Incidents"), an investigation was initiated by SCWW's legal counsel (the "Investigation"). This Investigation is ongoing, and is being conducted by legal counsel, with myself serving as the lead, with assistance provided by former state and federal environmental crimes prosecutors and law enforcement officers, and scientific and forensic experts knowledgeable in chemical, environmental, regulatory and public health and safety matters.

Since 1959, Santa Clara Waste Water Company has continually provided environmental and waste water services to Ventura County farmers, industry and government, as well as residents with septic systems and water softeners. In fact, well over 90% of Ventura County septic system owners bring their waste to SCWW for processing. In addition, the Facility, which only accepts non-hazardous petroleum, domestic sewage and industrial waste for processing, is highly-regulated and frequently-inspected and scrutinized by numerous local, state and federal agencies. SCWW also has a long history of environmental compliance and

work place safety. The November 18, 2014 incidents are the first such events at the Facility in the more than 50 years of SCWW operations. SCWW had no history of explosions, fires or any other type of accidents similar to those occurring on November 18, 2014.

The following analysis and conclusion is based upon information gathered during the course of this Investigation, including the review of available documentation and records, the examination of physical evidence and the sampling and laboratory analysis of materials obtained from the premises of the Facility after the Incidents. Although we cannot say with 100% certainty that we now know all the relevant facts, the following analysis constitutes our best understanding and belief regarding the Incidents, and will be used to address any possible regulatory, enforcement and/or legal issues that may arise as a result of the Incidents.[1]

MOST LIKELY CAUSE OF THE EXPLOSION ON NOVEMBER 18, 2014:

Absent the discovery or receipt of any new information, the Investigation has reached the conclusion that the most likely cause of the explosion appears to be a chemical reaction resulting from the inadvertent mixing of non-hazardous domestic waste (i.e., septic and sewage) with sodium chlorite, which is a chemical treatment product commonly used in wastewater treatment systems and processes, including odor control and cleaning pipelines of bacteria that can generate hydrogen sulfide gas. This conclusion is based on the following analysis:

Although not a member of the site-controlling Incident Command ("IC"), which was comprised of USEPA, the County and Patriot, SCWW staff heard comments from various members of the IC suggesting that the possible cause of the explosion involved the treatment chemical "sodium chlorite." In response to these and other statements made by members of the IC, SCWW initiated a review of available records and confirmed that sodium chlorite, in liquid form, had been purchased by SCWW and delivered to the Facility by Miles Chemical in the late Summer of 2014 in a single 275-gallon, 2,825 pound plastic (and caged) shipping

[1] It should, however, be recognized and understood that between the date of the Incidents and January 9, 2015, the ability of SCWW to directly and thoroughly investigate and evaluate the nature and potential cause(s) of the Incidents was significantly hampered by the fact that SCWW had very little access to the premises of the Facility, which was initially under the control of an Incident Command ("IC"), then under the possession and control of either the County of Ventura or the United States Environmental Protection Agency ("USEPA"). At the time of the Incidents, the County initially assumed command of the Facility, which it subsequently relinquished to the USEPA. At that time, SCWW contracted with Patriot Environmental Services ("Patriot") to handle both the emergency response and the subsequent cleanup at the Facility. USEPA thereafter directed and oversaw all safety and cleanup activities on the premises of the Facility until January 9, 2015, when it completed its activities and relinquished control of the Facility back to SCWW, with regulatory oversight transferred to the County. Prior to the departure of the USEPA from the Facility on January 9, 2015, the materials involved in the Incidents had been safely and completely neutralized, solidified and/or disposed of under federal oversight. On January 9, 2015, SCWW was finally granted full access to and control the Facility. In addition to having very limited access to the premises of the Facility for nearly two months, many of the relevant records and materials relating to SCWW's operations at the Facility were either destroyed in the resulting fire on November 18, 2014 that consumed the on-site office and/or were seized by the Ventura County District Attorney's Office ("VCDA") as part of its ongoing investigation of the Incidents and related matters. As a consequence, the following analysis is based on information gathered during the course of SCWW's internal investigation, as well as learned through contacts and communications with various local, state and federal regulatory agencies, and will be supplemented as additional information and analysis is acquired. With that understanding and limitation, please find the following analysis.

and storage container known as a "tote."[2] Miles Chemical is a regular and long-time provider of chemical treatment products to SCWW, and also delivers non-hazardous wastewater contained in similar totes of various sizes for treatment at the Facility.

More specifically, the sodium chlorite, which was manufactured by DuPont and known by the brand name, "Headline 3875," was 31.25% active solution, with more than 5% available chlorine, and had a pH of 12.0. The Material Safety Data Sheet (MSDS) accompanying the tote of sodium chlorite provided, among other things, the following notices and warnings: "Fire and Explosion Hazard: Drying of this product on clothing or combustible materials may cause fire." . . .; "Spill Cleanup: Dilute with water. Pick up and transfer to properly labelled containers. After cleaning, flush away traces with water." . . .; "Handling: Avoid letting the product become dry.". . .; "Incompatibility: Strong acids and oxidizing agents, Organic materials, chlorinated compounds, reducing agents;". . .; and "Hazardous reactions: Contact with acids, organic materials, reducing agents and oxidizing agents will release toxic gases of chlorine and/or chlorine dioxide."

The tote of sodium chlorite was delivered to the Facility as part of a proposed program designed and supplied by Miles Chemical to protect against odors, sulfides and biological oxygen demand ("BOD") residuals potentially developing in the 12-mile trunk line or pipeline ("pipeline") to the City of Oxnard's Wastewater Treatment Plant ("WWTP"). SCWW had requested that Miles Chemical supply such an odor control program that could be easily administered through manual controls. For example, as part of this proposed program, SCWW would provide the chemical feed pumps necessary to manually inject the sodium chlorite and other treatment products into the pipeline system. It was SCWW's understanding that Miles Chemical had been working closely with both the Naval Air Station at Point Mugu and the City of Oxnard on a similar program for several years. However, SCWW never implemented the proposed program and, as a result, had not yet had an opportunity to use the sodium chlorite prior to the Incidents of November 18, 2014.

Rather, once delivered to the Facility, the sodium chlorite remained unused and contained in its properly labeled and original shipping tote, and was stored along with other treatment products and totes on a concrete pad located on the Facility. The totes delivered by Miles Chemical and stored on the concrete pad were marked or labeled as either non-hazardous wastewater for treatment or with treatment product identification information bearing the required warnings and handling protocols.

On the evening of November 17 and early morning hours of November 18, 2014, as part of the regular processing of wastewater and housekeeping efforts, SCWW employees were using a vacuum truck with a 20-foot tractor and a 40-foot trailer, and a 120-barrel capacity tank, that was owned by and leased from another company known as 805 Trucking (the "805 Vacuum Truck"). The 805 Vacuum Truck was used by SCWW exclusively on the premises of the Facility for the purpose of transferring liquids contained in totes and other storage tanks to certain receiving stations for processing and treating non-hazardous wastes located

[2] As part of this Investigation, it was determined that SCWW's existing hazardous materials business plan and inventory had not yet been updated via the online California Environmental Reporting System ("CERS") prior to the date of the Incidents.

throughout the Facility. The 805 Vacuum Truck was not leased or used by SCWW for any off-site purposes.

On the morning of November 18, shortly before the explosion that occurred at approximately 3:45 a.m., the 805 Vacuum Truck was being driven and operated by an employee of SCWW. Specifically, a hose on the 805 Vacuum Truck was being used to suck up non-hazardous wastewaters contained in various totes and transfer them into the 805 Vacuum Truck, which also contained non-hazardous domestic wastes. At that time, the sodium chlorite solution delivered by Miles Chemical, which was still in its original, labeled shipping tote and stored on a concrete pad, was inadvertently sucked up and transferred into the 805 Vacuum Truck. The 805 Vacuum Truck was then moved to one of several receiving stations located on the premises of the Facility in preparation for transferring the liquid mixture now contained in the Truck into an above-ground processing tank. However, before the transfer process from the 805 Vacuum Truck to the processing tank was initiated, the inadvertent mixture of the sodium chlorite with the other non-hazardous wastes contained within the Truck created a chemical reaction and pressure that resulted in the explosion.

As a result of the explosion, the rear section of the 805 Vacuum Truck ruptured and broke off, with the force of the blast scattering debris. The contents of the 805 Vacuum Truck spilled onto an area located on the premises of the Facility, including landing on the concrete containment driveway, receiving bins, totes and other items (the "Spilled Material").

Following the explosion, SCWW personnel immediately called 911 to report the explosion. The Santa Paula Fire Department was the first agency to arrive at the Facility in response to SCWW's call. Other agencies, including the Ventura County Fire and Environmental Health Departments, also soon arrived at the Facility. Upon their arrival at the Facility, personnel from the fire departments and Environmental Health Department discussed the possible cause(s) of the explosion and a proposed abatement and cleanup action plan with a SCWW representative. Further discussion determined that there was the potential for the drying Spilled Material to ignite, with SCWW representatives suggesting that the affected area be immediately sprayed with water. Soon thereafter, the Fire Department set up an area located across the street from the Facility, removed everyone from the premises and began cordoning off the Facility to prevent further access. A fire truck that had responded to the initial emergency call, and that had driven through the Spilled Material, remained parked by the Facility's entrance gate. As it was preparing to drive off, the tires of the fire truck "popped." The Fire Chief then ordered an evacuation zone to be established.

As the sun began to rise and the winds picked up, the Spilled Material dried and began to spontaneously combust. This resulted in a second incident of fire at approximately 9:45 a.m., which impacted an area of approximately 3,000 square feet in size on the premises of the Facility, including igniting totes containing chemical treatment products that were stored on a concrete pad, as well as destroying a nearby small receiving shed. The Fire Department then set up an IC Center across the street from the Facility, subsequently moving it down the road later that morning, then again moving it to its final location that evening in Santa Paula.[3]

[3] Immediately after the Incidents, the Facility's operations and utilities were shut down and the premises secured. The location on the south side of the Facility known as the "Shipping Pit," which is the starting point for the 12-

Following the Incidents, SCWW also retained the environmental consulting firm of Haley & Aldrich to assist in identifying and implementing steps to prevent a recurrence of the Incidents, including reviewing and modifying SCWW's protocols as necessary. During this time period, the Center for Toxicology and Environmental Health, LLC ("CTEH") was also retained by Patriot to perform various environmental tasks, including a Tote Visual Assessment that was conducted in December 2014 ("Tote Assessment Report"). The purpose of the Tote Assessment Report was to locate, identify, uniquely-number, visually examine, map and photograph all of the totes located on the premises of the Facility. According to the Tote Assessment Report, one tote of sodium chlorite, which was given the unique number "TT010," was found located on a concrete storage pad along with several other similar totes in an area described as the "Northeast side of B4," and was further described in the Tote Inventory as, "Very small amount of liquid present, labeled for sodium chlorite 31.25% active."[4] The photograph of the sodium chlorite tote contained within in the Tote Assessment Report depicts a caged tote bearing a hazardous placard with number "1908," which is the proper "corrosive" identification number for a tote containing sodium chlorite. According to the Tote Assessment Report, there was only one tote found on the premises of the Facility labeled, or in any manner identified, as containing sodium chlorite.[5]

In mid-December 2014, counsel for SCWW also engaged in several conversations with representatives of the VCDA regarding the status of the pending investigation of the Incidents, including having a face-to-face meeting with various members of the VCDA on December 12, 2014. During the course of that meeting, the stated and primary focus of the VCDA was to learn the identity (or identities) of the chemical(s) involved in the Incidents in order to assist in the aid and recovery of those injured during the Incidents, including first responders. In response to those inquiries, SCWW counsel assured the VCDA that the top priority for SCWW would be to investigate and learn the cause(s) of the Incident, including the identity of the chemical(s) that may have been involved in the explosion.

During the following week, SCWW representatives reached out to and had several discussions with USEPA's On-Scene Coordinator ("OSC") and others to arrange for the safe and timely taking of samples from the premises of the Facility. During those conversations, SCWW learned that most of the materials remaining on the premises of the Facility had been neutralized and/or solidified and therefore, might no longer prove useful in identifying the chemicals at issue in the Incidents. However, according to USEPA, the remaining contents of the 805 Vacuum Truck had not yet been neutralized and were available to be sampled. Unfortunately, due to a lack of access to the Facility, SCWW was not able to obtain any samples of the contents of the 805 Vacuum Truck until Saturday, December 20, 2014. On

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mile pipeline, was also immediately closed in order to eliminate any possibility of shipping via pipeline any contaminated material to the WWTP. Subsequent testing of the effluent confirmed that no contaminated or harmful chemicals or materials were ever discharged into, or present in, the pipeline or posed any threat to the pipeline or the WWTP as a result of the Incidents.

[4] SCWW understands that as part of its response to the Incidents, the IC identified and established certain sectors and decontamination zones on the premises of the Facility, including "Sector B4," which is the area in which the tote of sodium chlorite was found stored on the concrete pad.

[5] As mentioned above, a single tote of sodium chlorite is consistent with SCWW records. In addition, although it may be impossible to track with absolute certainty the movements of that particular tote, it was found on a concrete pad area used for the storage of chemical treatment products during the time period it was delivered to the Facility.

that date, under the oversight of the USEPA OSC, two liquid grab samples were collected from both the intake and discharge piping assemblies of the 805 Vacuum Truck by an environmental contractor acting on the behalf of SCWW. The two samples were thereafter transported to and delivered under chain of custody to a certified laboratory for analysis. The analysis of Sample Number 1, which was obtained from the intake piping, showed the following: 120,000 parts per million ("ppm") or 12% of chlorate and 80,000 ppm or 8% of chlorite. The analysis of Sample Number 2, which was obtained from the discharge piping, showed the following: 550 parts per billion ("ppb") of chlorate and 1900 ppb of chlorite.[6]

On January 4, 2015, shortly after receiving the above-mentioned laboratory analyses of the two grab samples taken from the 805 Vacuum Truck, SCWW counsel notified the VCDA via email that the substances chlorate and chlorite were both found in those samples. In addition to assisting the VCDA in its efforts to identify the potential cause of the Incidents, SCWW counsel further hoped to provide any information that might be useful in the treatment and recovery of first responders by adding, "[b]ased our preliminary evaluation, it would appear that some level of chlorine dioxide and/or chlorine gas was generated during the Incident."

CONCLUSION:

Based on the foregoing, it appears readily apparent that the treatment product sodium chlorite, when inadvertently mixed and reacting with non-hazardous wastewaters, including domestic and septic wastes, in the 805 Vacuum Truck, was the most likely and probable cause of the explosion. The primary and most compelling evidence supporting this conclusion is the finding of both chlorite and chlorate in the two liquid grab samples obtained from the 805 Vacuum Truck on December 20, 2014. Secondly, as documented in the Tote Assessment Report, the labeled and nearly-empty sodium chlorite tote was found stored on a concrete pad in an area of the Facility where the 805 Vacuum Truck had been used in processing and cleaning activities on the morning of November 18, 2014. Lastly, the nature of the subsequent fire is consistent with the presence and characteristics of drying sodium chlorite and/or chlorate, as noted in the notices and warnings provided in the applicable MSDSs.

In order to better prevent such accidents from occurring in the future, it is my understanding that professional environmental consultants have recommended, and SCWW has agreed to implement, the following policy changes:

1. The Facility will no longer accept any wastewater contained in totes. The only totes allowed to be present on the premises will contain clearly-marked and labeled chemical treatment products.

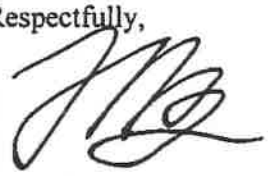
2. Additional and targeted safety training will reinforce the new policy that all liquid materials in totes are to be considered "product" and shall never be handled or

[6] Based on commonly understood principles of chemistry, it is possible that every molecule of chlorate found in the samples was a byproduct of the reaction between sodium chlorite and other materials mixed in the 805 Vacuum Truck. As such, the finding of those concentrations of chlorate (12%) and chlorite (8%) in the sample taken from the intake piping of the 805 Vacuum Truck, is consistent with a source that is 20% or more of sodium chlorite.

processed as wastewater, along with posted detailed protocols and reminders, as well as listed potential sanctions for any violations.

This new policy has been recommended in order to prohibit any employee from pumping or transferring any material from any tote into a vacuum truck. This policy change has been designed to render it essentially impossible for this accident to ever re-occur, because it eliminates the possibility of the inadvertent mixing of any potentially incompatible materials.

Respectfully,



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w.carter@mpglaw.com

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CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

4L22050

Page: 1 of 1

1387730

Section A Required Client Information:

Company:	CTEH
Address:	5120 Northside Dr, N. Little Rock, AR
Email To:	KLawrence@cteh.com
Phone:	501-801-8500
Fax:	
Requested Due Date/TAT:	

Section B Required Project Information:

Report To:	Kyle Lawrence
Copy To:	
Purchase Order No.:	
Project Name:	SCWW Mission Incident
Project Number:	106846

Section C Invoice Information:

Attention:	
Company Name:	
Address:	
Pace Quote Reference:	
Pace Project Manager:	
Pace Profile #:	

REGULATORY AGENCY

☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER
☐ UST ☐ RCRA ☒ OTHER

Site Location STATE: CA

Section D Required Client Information

SAMPLE ID (A-Z, 0-9 / ,-) Sample IDs MUST BE UNIQUE

Matrix Codes MATRIX / CODE: Drinking Water DW, Water WT, Waste Water WW, Product P, Soil/Solid SL, Oil OL, Wipe WP, Air AR, Tissue TS, Other OT

COLLECTED: ~~COMPOSITE START~~ RW; ~~COMPOSITE END/GRAB~~ RW — GRAB SAMPLES

Requested Analysis Filtered (Y/N)

ITEM #	SAMPLE ID	MATRIX CODE	SAMPLE TYPE (G=GRAB C=COMP)	Collected DATE	Collected TIME	Composite End DATE	Composite End TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Analysis Test: RETAIN	Residual Chlorine (Y/N)	Pace Project No./ Lab I.D.
1	122014-120BBL-PASS	WT	G	12/20/14	1215	—	—		1	X								X	Y	
2	122014-120BBL-DRIV	WT	G	12/20/14	1215	—	—		1	X								X	Y	
3																				
4																				
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				

Rows 3–12: Not Used RWoodley 12/20/14

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS
*Open in neg pressure hood. Potential chlorine evolution.	Randall Woodley	12/20/14	1538	Jan Swanner - Rooy	12/20/14	1538	
	Jane Rooy CTEH	12/22/14	1312	[signature] - Admin 12/22/14		1312	3.9°C

SAMPLER NAME AND SIGNATURE

WECK LABORATORIES, INC.
Analytical Laboratory Service - Since 1964

Analytical Service Quotation

Contact: Adam Love
Client Name: Roux Associates, Inc. - Oakland CA
Address: 555 12th Street, Ste. 1725
Oakland, CA 94607
Phone: (415) 967-6023
Fax:

Printed: 12/22/2014
Effective: 12/22/14
Expires: 06/30/15

Project: Roux Assoc. / Blanket

Code	Method	Qty	TAT (workdays)	Unit Price	Extended Price
Water					
Chlorate - EPA 300.1	EPA 300.1	2	1	$130.00	$260.00
Chlorite - EPA 300.1	EPA 300.1	2	1	$130.00	$260.00

Bid Total: $520.00

Marilyn Romero

Marilyn Romero
Client Services Manager

Payment terms are NET 30 days from invoice date. New accounts require payment prior to the release of test results until a credit application has been approved. Weck Laboratories accepts credit card payments (VISA/Master Card, American Express). Credit application/credit card approval form and Weck Laboratories' terms & conditions can be found at www.wecklabs.com under Resources

Weck Laboratories, Inc. 14859 East Clark Avenue, City of Industry, CA 91745. Phone: (626) 336-2139 Fax: (626) 336 - 2634
www.wecklabs.com

WECK LABORATORIES, INC.
Analytical Laboratory Service - Since 1964

Certificate of Analysis

Report Date: 12/23/14 14:31
Received Date: 12/22/14 13:12
Turnaround Time: 1 workday

Project:

Phones: (415) 967-6023
Fax:

P.O. #:

Attn: Adam Love

Client: Roux Associates, Inc. - Oakland CA
555 12th Street, Ste. 1725
Oakland, CA 94607

Dear Adam Love :

Enclosed are the results of analyses for samples received 12/22/2014 with the Chain of Custody document. The samples were received in good condition, at 3.9 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Lab Sample ID: 4L22050-01 **Sample ID:** 122014-120BBL-Pass **Matrix:** Water
Sampled by: Client **Sampled:** 12/20/14 12:15

Analyte	Result	MDL	MRL	Units	Dil	Method	Prepared	Analyzed	Batch	Qualifier
Chlorate	**120000000**		5000000	ug/l	500000	EPA 300.1	12/23/14	12/23/14 10:05	W4L1400	
Chlorite	**80000000**		5000000	ug/l	500000	EPA 300.1	12/23/14	12/23/14 10:05	W4L1400	
Surrogate: Dichloroacetate	*106 %*		*90-115*	%		Concentration: *528*				
Surrogate: Dichloroacetate	*106 %*		*90-115*	%		Concentration: *528*				

Lab Sample ID: 4L22050-02 **Sample ID:** 122014-120BBL-Driv **Matrix:** Water
Sampled by: Client **Sampled:** 12/20/14 12:15

Analyte	Result	MDL	MRL	Units	Dil	Method	Prepared	Analyzed	Batch	Qualifier
Chlorate	**550**		500	ug/l	50	EPA 300.1	12/23/14	12/23/14 11:48	W4L1400	
Chlorite	**1900**		500	ug/l	50	EPA 300.1	12/23/14	12/23/14 11:48	W4L1400	
Surrogate: Dichloroacetate	*93 %*		*90-115*	%		Concentration: *467*				
Surrogate: Dichloroacetate	*93 %*		*90-115*	%		Concentration: *467*				

Weck Laboratories, Inc. 14859 East Clark Avenue City of Industry, California 91745-1396 (626) 336-2139 FAX (626) 336-2634
www.wecklabs.com

Certificate of Analysis

Quality Control Section

Anions by IC, EPA Method 9056 - Quality Control

Batch W4L1400 - EPA 300.1

Blank (W4L1400-BLK1) — Prepared: 12/23/14 Analyzed: 12/23/14 09:45

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		*527*		ug/l	*500*	*105*	*90-115*		
Surrogate: Dichloroacetate		*527*		ug/l	*500*	*105*	*90-115*		
Chlorate		ND		ug/l					
Chlorite		ND		ug/l					

LCS (W4L1400-BS1) — Prepared: 12/23/14 Analyzed: 12/23/14 09:25

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		*498*		ug/l	*500*	*100*	*90-115*		
Surrogate: Dichloroacetate		*498*		ug/l	*500*	*100*	*90-115*		
Chlorate		101		ug/l	100	101	85-115		
Chlorite		95.7		ug/l	100	96	85-115		

Matrix Spike (W4L1400-MS1) — Source: 4L22050-01 — Prepared: 12/23/14 Analyzed: 12/23/14 12:08

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		*500*		ug/l	*500*	*100*	*90-115*		
Surrogate: Dichloroacetate		*500*		ug/l	*500*	*100*	*90-115*		
Chlorate	115000000	172000000		ug/l	50000000	114	76-120		
Chlorite	80000000	127000000		ug/l	50000000	93	78-129		

Matrix Spike Dup (W4L1400-MSD1) — Source: 4L22050-01 — Prepared: 12/23/14 Analyzed: 12/23/14 12:28

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		*508*		ug/l	*500*	*102*	*90-115*		
Surrogate: Dichloroacetate		*508*		ug/l	*500*	*102*	*90-115*		
Chlorate	115000000	168000000		ug/l	50000000	107	76-120	2	20
Chlorite	80000000	128000000		ug/l	50000000	96	78-129	1	20

Weck Laboratories, Inc. 14859 East Clark Avenue, City of Industry, California 91745-1396 (626) 336-2139 FAX (626) 336-2634
www.wecklabs.com

Certificate of Analysis

Notes:
The Chain of Custody document is part of the analytical report.
Any remaining sample(s) for testing will be disposed of one month from the final report date unless other arrangements are made in advance.
All results are expressed on wet weight basis unless otherwise specified.

An Absence of Total Coliform meets the drinking water standards as established by the State of California Department of Health Services.
The Reporting Limit (RL) is referenced as laboratory's Practical Quantitation Limit (PQL).
For Potable water analysis, the Reporting Limit (RL) is referenced as Detection Limit for reporting purposes (DLRs) defined by EPA.

If sample collected by Weck Laboratories, sampled in accordance to lab SOP MIS002

Authorized Signature
Contact: Valerie Rejuso
(Project Manager)

ELAP # 1132
LACSD # 10143
NELAC # 04229CA

The results in this report apply to the samples analyzed in accordance with the chain of custody document. Weck Laboratories certifies that the test results meet all requirements of NELAC unless noted in the Case Narrative. This analytical report must be reproduced in its entirety.

Flags for Data Qualifiers:

ND	NOT DETECTED at or above the Reporting Limit. If J-value reported, then NOT DETECTED at or above the Method Detection Limit (MDL).
Sub	Subcontracted analysis, original report enclosed.
DL	Method Detection Limit
RL	Method Reporting Limit
MDA	Minimum Detectable Activity
NR	Not Reportable

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CTEH CENTER FOR TOXICOLOGY AND ENVIRONMENTAL HEALTH, LLC

Mission Incident
Santa Paula, CA
Preliminary Tote Visual Assessment
December 30, 2014

Prepared by
Center for Toxicology and Environmental Health, L.L.C. (CTEH®)

CTEH CENTER FOR TOXICOLOGY AND ENVIRONMENTAL HEALTH, LLC

Totes present within the perimeter of the Santa Clara Wastewater Co. facility were visually assessed and documented by CTEH® personnel as of December 30, 2014. Additional totes may be present that have not yet been discovered. Table 1 below contains a list of totes found including responder comments and category assigned by an onsite chemist. Table 2 contains a total count of totes organized by each category. Also attached is a map depicting each tote location within the facility as well as photos and documentation from field personnel.

Table 1 - Tote Inventory – Visual Assessment[1]

Tote ID	Comments	Category[2]
TT001	2-3inches of liquid in bottom, label says water softener brine	Empty
TT002	Very little liquid, label says water softener brine	Empty
TT003	Very little amount of water, written label says -salt softener regen brine	Empty
TT004	Small amount of liquid, contents on label salt softener regen brine	Empty
TT005	3/4 full, labeled as COPREP 320-L	Polymer
TT006	Thick white polymer	Polymer
TT007	Appears empty and with no label	Empty
TT008	There is a little bit of solid in the bottom, no label	Empty
TT009	About 80% full, labeled COPREP 460TC	Polymer
TT010	Very small amount of liquid present, labeled for sodium chlorite 31.25% active	Hypochlorite
TT011	Empty and unlabeled	Empty
TT012	Small amount of liquid in bottom, no label	Empty
TT013	Very small about of liquid in bottom, no label	Empty
TT014	Unknown level of liquid, labeled for sulfuric acid	Acid
TT015	Labeled for sulfuric acid	Acid
TT016	Tote labeled for sulfuric acid very little liquid in side	Acid
TT017	700 gallon tote with 5-6 inches of fluid at the bottom, no label present	Peroxide
TT018	1/3rd full tote with labels for ferric sulfate 50% solution	Ferric Sulfate
TT019	Tote is approximately 15% full. Liquid is clear with some particulate matter.	Pres. Wash Container
TT020	Appears to be empty, no label apparent	Empty
TT021	4/5ths full, on raised platform, no label	Process Container
TT022	No label, seems to be at least half full, to looks dark, tote in 4-6 inches of liquid	Acid
TT023	1/4 full, no label, opaque liquid	Polymer
TT024	1/3 full of grey solid looking substance, no label	Polymer
TT025	Half full of liquid, no label,	Peroxide
TT026	About 10inches of liquid, no label	Process Container
TT027	250 gallons of unknown liquid, no label	Process Container
TT028	Large container 2/3rds full of hydrogen peroxide	Peroxide
TT029	Half full with hand written H2O2	Peroxide
TT030	COPREP 460TC on label and about 80% full	Process Container
TT031	3/4full, label says - COPREP 460TC	Process Container
TT032	Inside is dry, no label	Empty

[1]*Note: The data set displayed here has not undergone complete QA/QC analysis and is presented in a preliminary format*
[2]*Totes categorized as Empty contain less than or equal to one inch of product (RCRA empty)*

Table 1 - Tote Inventory – Visual Assessment (continued)[1]

Tote ID	Comments	Category[2]
TT033	About 12 inches of liquid on a stand, label unclear but says - 460TC	Process Container
TT034	12 inches of liquid no readable label	Process Container
TT035	2/3 full, on stand, no label	Process Container
TT036	About 1/3rd full, unknown liquid on raised stand, no label	Process Container
TT037	3/4 full of white polymer like substance with pump attached, labeled	Polymer
TT038	2/3rd full about 150-175 gallons of black liquid sitting in a plastic base with white fluid	Flammable
TT039	Empty Tank - updated duplicate ID from TT037 to TT039	Empty
TT040	Empty tote on elevated stand with label for ferric sulfate 50% solution	Empty
TT041	Empty tote labeled for caustic soda 50%	Empty
TT042	Empty ferric sulfate 50% solution tote	Empty
TT043	Empty tote labeled for hypochlorite solution	Empty
TT044	Empty tote labeled for caustic soda	Empty
TT045	Empty tote labeled for H2O2	Empty
TT046	No label present and 4-5 inches of liquid in the bottom	Process Container
TT047	White polymer-like substance in bottom 5-6 inches of tote. No label present	Polymer
TT048	Empty tote, degraded label, with bags of NaOH	Empty
TT049	Empty tote no label	Empty
TT050	Empty tote, no label	Empty
TT051	Tote appears empty and no label	Empty
TT052	Tote appears empty and no label	Empty
TT053	Empty tote, no label	Empty
TT054	Some solid in downslope corner of tote and no label	Empty
TT055	Empty tote labeled as COPREP 320 L	Empty
TT056	Appears empty, hand written label for waste water/dietary supp	Empty
TT057	No readable label and empty	Empty
TT058	Empty 50 gallon barrel, labeled for chlorine dioxide	Empty
TT059	Appears empty, no apparent label	Empty
TT060	Appears empty 50 gallon drum, label says, wolf berry liquid extract	Empty
TT061	In metal cage on platform, no label, 3-4 inches of liquid	Process Container
TT062	Empty container, no clear label	Empty
TT063	Deformed tote with no label	Empty
TT064	12 inches of clear liquid. Tote is in tan con ex box.	Acid

[1]*Note: The data set displayed here has not undergone complete QA/QC analysis and is presented in a preliminary format*
[2]*Totes categorized as empty contain less than or equal to one inch of product (RCRA empty)*

Table 2 – Total Tote Count by Category

Totals[1]			
Acid	5	***Peroxide***	4
Empty	33	***Polymer***	7
Ferric Sulfate	1	***Pressure Wash Container***	1
Flammable	1	***Process Container***	11
Hypochlorite	1	**TOTAL**	**64**

[1]*Note: The data set displayed here has not undergone complete QA/QC analysis and is presented in a preliminary format*

Tote Locations - 2014-12-30

Mission Incident

Project: 106846
Client: Patriot Environmental
City: Santa Paula, CA
County: Ventura

PROJECTION SYSTEM: *Transverse Mercator* DATUM: *WGS 1984*

LAST UPDATED: *1/2/2015 8:26:00 AM*

106846 - MISSION INCIDENT Site Activities - Tote Visual Assessment

ID: 127203
Date: 2014/12/30 13:32
Primary Identifier: TT001
Secondary Identifier: TT001
GPS: 34.31482, -119.10429
Location Description: West tote bank
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: 2-3inches of liquid in bottom, label says water softener brine

ID: 127184
Date: 2014/12/30 13:31
Primary Identifier: TT002
Secondary Identifier: TT002
GPS: 34.31482, -119.10428
Location Description: West tote farm
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Very little liquid, label says water softener brine

ID: 127206
Date: 2014/12/30 13:29
Primary Identifier: TT003
Secondary Identifier: TT003
GPS: 34.31487, -119.10429
Location Description: West tote farm
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Very little amount of water, written label says -salt softener regen brine

ID: 127163 **GPS:** 34.31491, -119.10426
Date: 2014/12/30 11:52 **Location Description:** West tote farm
Primary Identifier: TT004 **Observation Type:** Survey
Secondary Identifier: TT004 **Observation Subtype:** Existing Fixed Location
Comments: Small amount of liquid, contents on label salt softener regen brine

ID: 127151 **GPS:** 34.31494, -119.1044
Date: 2014/12/30 11:23 **Location Description:** West tote farm
Primary Identifier: TT005 **Observation Type:** Survey
Secondary Identifier: TT005 **Observation Subtype:** Existing Fixed Location
Comments: 3/4 full, labeled as COPREP 320-L



ID: 127272 **GPS:** 34.31492, -119.10442
Date: 2014/12/29 15:14 **Location Description:** West tote farm
Primary Identifier: TT006 **Observation Type:** Survey
Secondary Identifier: TT006 **Observation Subtype:** Existing Fixed Location
Comments: Thick white polymer

ID: 127158
Date: 2014/12/30 11:26
Primary Identifier: TT007
Secondary Identifier: TT007
GPS: 34.3151, -119.1044
Location Description: West tote farm
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Appears empty and with no label


ID: 127182
Date: 2014/12/30 11:35
Primary Identifier: TT008
Secondary Identifier: TT008
GPS: 34.31498, -119.10439
Location Description: West tote farm in B4
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: There is a little bit of solid in the bottom, no label


ID: 127150
Date: 2014/12/30 11:30
Primary Identifier: TT009
Secondary Identifier: TT009
GPS: 34.31507, -119.10432
Location Description: West tote farm in B4
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: About 80% full, labeled COPREP 460TC



ID: 127164 **GPS:** 34.31504, -119.10427

Date: 2014/12/30 11:46 **Location Description:** Northeast side of B4

Primary Identifier: TT010 **Observation Type:** Survey

Secondary Identifier: TT010 **Observation Subtype:** Existing Fixed Location

Comments: Very small amount of liquid present, labeled for sodium chlorite 31.25% active



ID: 127153 **GPS:** 34.31498, -119.10423

Date: 2014/12/30 11:48 **Location Description:** Tote in group between frac tanks near SW corner of hot zone.

Primary Identifier: TT011 **Observation Type:** Survey

Secondary Identifier: TT011 **Observation Subtype:** Existing Fixed Location

Comments: Empty and unlabeled

ID: 127159 **GPS:** 34.31501, -119.10425

Date: 2014/12/30 11:45 **Location Description:** Tote in group between frac tanks near SW corner of hot zone

Primary Identifier: TT012 **Observation Type:** Survey

Secondary Identifier: TT012 **Observation Subtype:** Existing Fixed Location

Comments: Small amount of liquid in bottom, no label

ID: 127160
Date: 2014/12/30 11:43
Primary Identifier: TT013
Secondary Identifier: TT013
GPS: 34.31502, -119.10427
Location Description: Tote in group between frac tanks near SW corner of hot zone
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Very small about of liquid in bottom, no Label

ID: 127148
Date: 2014/12/30 09:52
Primary Identifier: TT014
Secondary Identifier: TT014
GPS: 34.31453, -119.10442
Location Description: A1 southwest of A2
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Unknown level of liquid, labeled for sulfuric acid

ID: 127139
Date: 2014/12/30 09:45
Primary Identifier: TT015
Secondary Identifier: TT015
GPS: 34.3145, -119.10444
Location Description:
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Labeled for sulfuric acid

ID: 127144 **GPS:** 34.31451, -119.10439
Date: 2014/12/30 09:47 **Location Description:** A1 southwest of A2
Primary Identifier: TT016 **Observation Type:** Survey
Secondary Identifier: TT016 **Observation Subtype:** Existing Fixed Location

Comments: Tote labeled for sulfuric acid very little liquid in side

ID: 127136 **GPS:** 34.31453, -119.1044
Date: 2014/12/30 09:37 **Location Description:** A1 by fire fighters station
Primary Identifier: TT017 **Observation Type:** Survey
Secondary Identifier: TT017 **Observation Subtype:** Existing Fixed Location

Comments: 700 gallon tote with 5-6 inches of fluid at the bottom, no label present

ID: 127149 **GPS:** 34.3144, -119.10429
Date: 2014/12/30 09:33 **Location Description:** Next to fire station in A1
Primary Identifier: TT018 **Observation Type:** Survey
Secondary Identifier: TT018 **Observation Subtype:** Existing Fixed Location

Comments: 1/3rd full tote with labels for ferric sulfate 50% solution

ID: 127212
Date: 2014/12/30 09:27
Primary Identifier: TT019
Secondary Identifier: TT019
GPS: 34.31529, -119.10468
Location Description: Tote on trailer of pressure washer
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Tote is approximately 15% full. Liquid is clear with some particulate matter. Tote is water container connected to pressure washer.

ID: 127189
Date: 2014/12/30 13:44
Primary Identifier: TT020
Secondary Identifier: TT020
GPS: 34.3153, -119.10433
Location Description: Next to frac tank A2463
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Appears to be empty, no label apparent



ID: 127199
Date: 2014/12/30 13:55
Primary Identifier: TT021
Secondary Identifier: TT021
GPS: 34.31523, -119.10393
Location Description: Northwest of patriot vac truck in pool
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: 4/5ths full, on raised platform, no label




ID: 127177 **GPS:** 34.31446, -119.10401
Date: 2014/12/30 14:37 **Location Description:** Next to B1 and A1
Primary Identifier: TT022 **Observation Type:** Survey
Secondary Identifier: TT022 **Observation Subtype:** Existing Fixed Location
Comments: No label, seems to be at least half full, to looks dark, tote in 4-6 inches of liquid



ID: 127201 **GPS:** 34.31445, -119.10401
Date: 2014/12/30 14:40 **Location Description:** In unmarked area next to corner of A1 and B1
Primary Identifier: TT023 **Observation Type:** Survey
Secondary Identifier: TT023 **Observation Subtype:** Existing Fixed Location
Comments: 1/4 full, no label, opaque liquid



ID: 127185 **GPS:** 34.31446, -119.104
Date: 2014/12/30 14:42 **Location Description:** In unmarked area next to corner of A1 and B1
Primary Identifier: TT024 **Observation Type:** Survey
Secondary Identifier: TT024 **Observation Subtype:** Existing Fixed Location
Comments: 1/3 full of grey solid looking substance, no label



ID: 127204
Date: 2014/12/30 14:48
Primary Identifier: TT025
Secondary Identifier: TT025
GPS: 34.3144, -119.10402
Location Description: In unmarked area next to corner of A1 and B1
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Half full of liquid, no label,



ID: 127195
Date: 2014/12/30 14:47
Primary Identifier: TT026
Secondary Identifier: TT026
GPS: 34.31442, -119.10399
Location Description: In unmarked area next to corner of A1 and B1
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: About 10inches of liquid, no label


ID: 127198
Date: 2014/12/30 14:45
Primary Identifier: TT027
Secondary Identifier: TT027
GPS: 34.31445, -119.10397
Location Description: In unmarked area next to corner of A1 and B1
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: 250 gallons of unknown liquid, no label


ID: 127193 **GPS:** 34.31455, -119.10392
Date: 2014/12/30 14:14 **Location Description:** East corner of B1
Primary Identifier: TT028 **Observation Type:** Survey
Secondary Identifier: TT028 **Observation Subtype:** Existing Fixed Location

Comments: Large container 2/3rds full of hydrogen peroxide


ID: 127197 **GPS:** 34.31462, -119.10385
Date: 2014/12/30 14:16 **Location Description:** East corner of B1
Primary Identifier: TT029 **Observation Type:** Survey
Secondary Identifier: TT029 **Observation Subtype:** Existing Fixed Location

Comments: Half full with hand written H2O2

ID: 127190 **GPS:** 34.31503, -119.10406
Date: 2014/12/30 14:03 **Location Description:** Border of C1 and C2
Primary Identifier: TT030 **Observation Type:** Survey
Secondary Identifier: TT030 **Observation Subtype:**

Comments: COPREP 460TC on label and about 80% full

ID: 127191
Date: 2014/12/30 14:06
Primary Identifier: TT031
Secondary Identifier: TT031
GPS: 34.31506, -119.10406
Location Description: Border of C1 and C2
Observation Type: Survey
Observation Subtype:

Comments: 3/4full, label says - COPREP 460TC


ID: 127183
Date: 2014/12/30 14:18
Primary Identifier: TT032
Secondary Identifier: TT032
GPS: 34.31461, -119.10386
Location Description: East of B1
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: Inside is dry, no label


ID: 127179
Date: 2014/12/30 14:23
Primary Identifier: TT033
Secondary Identifier: TT033
GPS: 34.31474, -119.10364
Location Description: Southeast of frac tank A1846OT
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: About 12 inches of liquid on a stand, label unclear but says - 460TC


ID: 127202 **GPS:** 34.31475, -119.10368
Date: 2014/12/30 14:27 **Location Description:** Southeast of frac tank A1846OT
Primary Identifier: TT034 **Observation Type:** Survey
Secondary Identifier: TT034 **Observation Subtype:** Existing Fixed Location
Comments: 12 inches of liquid no readable label



ID: 127200 **GPS:** 34.3148, -119.10334
Date: 2014/12/30 14:57 **Location Description:** By water and mulch pile
Primary Identifier: TT035 **Observation Type:** Survey
Secondary Identifier: TT035 **Observation Subtype:** Existing Fixed Location
Comments: 2/3 full, on stand, no label



ID: 127145 **GPS:** 34.31448, -119.10397
Date: 2014/12/30 09:11 **Location Description:** On concrete pad across from plastic wrapped shack
Primary Identifier: TT036 **Observation Type:** Survey
Secondary Identifier: TT036 **Observation Subtype:** Existing Fixed Location
Comments: About 1/3rd full, unknown liquid on raised stand, no label


ID: 127135
Date: 2014/12/30 09:07
Primary Identifier: TT037
Secondary Identifier: TT037
GPS: 34.31446, -119.10397
Location Description: Across from plastic covered shack on concrete pad
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: 3/4 full of white polymer like substance with pump attached, labeled



ID: 127142
Date: 2014/12/30 08:56
Primary Identifier: TT038
Secondary Identifier: TT038
GPS: 34.31459, -119.10374
Location Description: Adjacent to decon C
Observation Type: Survey
Observation Subtype: Existing Fixed Location

Comments: 2/3rd full about 150-175 gallons of black liquid sitting in a plastic base with white fluid




ID: 127140
Date: 2014/12/30 08:52
Primary Identifier: TT039
Secondary Identifier: TT039
GPS: 34.31414, -119.10381
Location Description: Adjacent to decon C
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty Tank - updated duplicate ID from TT037 to TT039


ID: 127146 **GPS:** 34.31448, -119.10418
Date: 2014/12/30 09:22 **Location Description:** Eat the southeast corner of A1 and B1
Primary Identifier: TT040 **Observation Type:** Survey
Secondary Identifier: TT040 **Observation Subtype:** New Fixed Location
Comments: Empty tote on elevated stand with label for ferric sulfate 50% solution

ID: 127141 **GPS:** 34.31438, -119.10434
Date: 2014/12/30 09:26 **Location Description:** A1 south of firefighters station
Primary Identifier: TT041 **Observation Type:** Survey
Secondary Identifier: TT041 **Observation Subtype:** New Fixed Location
Comments: Empty tote labeled for caustic soda 50%

ID: 127147 **GPS:** 34.31448, -119.1043
Date: 2014/12/30 09:30 **Location Description:** A1 by fire fighters station
Primary Identifier: TT042 **Observation Type:** Survey
Secondary Identifier: TT042 **Observation Subtype:** New Fixed Location
Comments: Empty ferric sulfate 50% solution tote

ID: 127138
Date: 2014/12/30 09:41
Primary Identifier: TT043
Secondary Identifier: TT043
GPS: 34.31454, -119.10445
Location Description: A1 southwest of A2
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty tote labeled for hypochlorite solution


ID: 127143
Date: 2014/12/30 09:50
Primary Identifier: TT044
Secondary Identifier: TT044
GPS: 34.31456, -119.10437
Location Description: A1 southwest of A2
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty tote labeled for caustic soda

ID: 127137
Date: 2014/12/30 09:53
Primary Identifier: TT045
Secondary Identifier: TT045
GPS: 34.31454, -119.10448
Location Description:
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty tote labeled for H2O2


ID: 127188 **GPS:** 34.31495, -119.10341

Date: 2014/12/30 10:52 **Location Description:** Southwest side of saturated media pile next to container ARTU 7001808

Primary Identifier: TT046 **Observation Type:** Survey

Secondary Identifier: TT046 **Observation Subtype:** New Fixed Location

Comments: No label present and 4-5 inches of liquid in the bottom


ID: 127192 **GPS:** 34.31498, -119.10345

Date: 2014/12/30 10:55 **Location Description:** Southwest side of saturated media pile next to container ARTU 7001808

Primary Identifier: TT047 **Observation Type:** Survey

Secondary Identifier: TT047 **Observation Subtype:** New Fixed Location

Comments: White polymer like substance in bottom 5-6 inches of tote. No label present




ID: 127155 **GPS:** 34.31496, -119.10439

Date: 2014/12/30 11:17 **Location Description:** B4 next to water truck

Primary Identifier: TT048 **Observation Type:** Survey

Secondary Identifier: TT048 **Observation Subtype:** New Fixed Location

Comments: Empty tote, degraded label, with bags of NaOH




ID: 127180
Date: 2014/12/30 11:19
Primary Identifier: TT049
Secondary Identifier: TT049
GPS: 34.31497, -119.10439
Location Description: B4
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty tote no label

ID: 127157
Date: 2014/12/30 11:21
Primary Identifier: TT050
Secondary Identifier: TT050
GPS: 34.315, -119.10432
Location Description: B4
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty tote, no label

ID: 127156
Date: 2014/12/30 11:28
Primary Identifier: TT051
Secondary Identifier: TT051
GPS: 34.31498, -119.1044
Location Description: West tote farm in B4
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Tote appears empty and no label

ID: 127154 **GPS:** 34.31506, -119.10427
Date: 2014/12/30 11:29 **Location Description:** West tote farm in B4
Primary Identifier: TT052 **Observation Type:** Survey
Secondary Identifier: TT052 **Observation Subtype:** New Fixed Location

Comments: Tote appears empty and no label

ID: 127186 **GPS:** 34.315, -119.10434
Date: 2014/12/30 11:37 **Location Description:** West tote farm in B4
Primary Identifier: TT053 **Observation Type:** Survey
Secondary Identifier: TT053 **Observation Subtype:** New Fixed Location

Comments: Empty tote, no label

ID: 127161 **GPS:** 34.31498, -119.10429
Date: 2014/12/30 11:38 **Location Description:** West tote farm
Primary Identifier: TT054 **Observation Type:** Survey
Secondary Identifier: TT054 **Observation Subtype:** New Fixed Location

Comments: Some solid in downslope corner of tote and no label

ID: 127162
Date: 2014/12/30 11:41
Primary Identifier: TT055
Secondary Identifier: TT055
GPS: 34.31502, -119.10435
Location Description: West tote farm in B4
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty tote labeled as COPREP 320 L


ID: 127152
Date: 2014/12/30 11:50
Primary Identifier: TT056
Secondary Identifier: TT056
GPS: 34.31493, -119.1043
Location Description: South side of tote tote farm in B4
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Appears empty, hand written label for waste water/dietary supp


ID: 127187
Date: 2014/12/30 13:35
Primary Identifier: TT057
Secondary Identifier: TT057
GPS: 34.31484, -119.10432
Location Description: West tote farm in B2
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: No readable label and empty



ID: 127178 **GPS:** 34.31529, -119.10465
Date: 2014/12/30 13:38 **Location Description:** Next to northwest fence line
Primary Identifier: TT058 **Observation Type:** Survey
Secondary Identifier: TT058 **Observation Subtype:** New Fixed Location

Comments: Empty 50 gallon barrel, labeled for chlorine dioxide


ID: 127205 **GPS:** 34.3153, -119.1044
Date: 2014/12/30 13:48 **Location Description:** West of frac tank A2463
Primary Identifier: TT059 **Observation Type:** Survey
Secondary Identifier: TT059 **Observation Subtype:** New Fixed Location

Comments: Appears empty, no apparent label


ID: 127194 **GPS:** 34.3153, -119.10431
Date: 2014/12/30 13:50 **Location Description:** West of frac tank A2463
Primary Identifier: TT060 **Observation Type:** Survey
Secondary Identifier: TT060 **Observation Subtype:** New Fixed Location

Comments: Appears empty 50 gallon drum, label says, wolf berry liquid extract


ID: 127181
Date: 2014/12/30 13:59
Primary Identifier: TT061
Secondary Identifier: TT061
GPS: 34.31518, -119.10381
Location Description: Northwest of pool next to green vertices
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: In metal cage on platform, no label, 3-4 inches of liquid

ID: 127196
Date: 2014/12/30 14:21
Primary Identifier: TT062
Secondary Identifier: TT062
GPS: 34.31481, -119.10371
Location Description: Northeast of B1 next to pool
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Empty container, no clear label


ID: 127207
Date: 2014/12/30 15:00
Primary Identifier: TT063
Secondary Identifier: TT063
GPS: 34.31496, -119.10329
Location Description: By saturated media pile and green light plant
Observation Type: Survey
Observation Subtype: New Fixed Location

Comments: Deformed tote with no label



ID: 127320 **GPS:** 34.31509, -119.10387

Date: 2015/01/01 16:21 **Location Description:** TR064

Primary Identifier: TT064 **Observation Type:** Survey

Secondary Identifier: Tote **Observation Subtype:** New Fixed Location

Comments: 12 inches of clear liquid. Tote is in tan con ex box.

SESPE
CONSULTING, INC.

374 Poli Street, Suite 200 • Ventura, CA 93001

Final Report - Emergency Use Authorization
Santa Clara Waste Water Facility
815 Mission Rock Road
Santa Paula, California 93060
APN 099-0-060-565

January 30, 2018

SESPE Project GR10.15.02

Prepared for:

Ventura County Planning Division
800 S. Victoria Avenue, L#1740
Ventura, California 93009

Prepared by:

SESPE Consulting, Inc.
374 Poli Street, Suite 200
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(805) 275-1515

SESPE
CONSULTING, INC.

374 Poli Street, Suite 200 • Ventura, CA 93001

Final Report - Emergency Use Authorization
Santa Clara Waste Water Facility
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SESPE Project GR10.15.02

Mike Biedebach
Project Manager

Rob Dal Farra
Vice President

SESPE CONSULTING, INC.
374 Poli Street, Suite 200 • Ventura, CA 93001

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SESPE
CONSULTING, INC.

374 Poli Street, Suite 200• Ventura, California 93001

Final Report - Emergency Use Authorization
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January 30, 2018

1.0 INTRODUCTION

This Final Report presents a summary of activities conducted under the Emergency Use Authorization, issued by the Ventura County Planning Division (County Planning) for the Santa Clara Waste Water (SCWW) Facility property located at 815 Mission Rock Road ("Site"), near Santa Paula, in Ventura County, California. See Figure 1 for a Site Aerial.

1.1 Purpose

Section 8111-1.2.1.c(1) of the Ventura County Non-Coastal Zoning Ordinance (NCZO) authorizes the County Planning Director to allow certain actions in the case of an emergency, including issuance of an Emergency Use Authorization (EUA).

1.2 Background

On November 18, 2014, there was an accidental explosion and subsequent fire at the SCWW Facility. Given the exigent circumstances and to expedite ongoing response actions at the facility, SCWW requested issuance of an EUA. On April 20, 2015, the County Planning Director issued the EUA. Subsequently, over the course of the project, the EUA was extended by County Planning, with the most recent extension granted on October 31, 2017.

The EUA request included the following procedures:

- Operating Procedure SCWW-02, Industrial Waste Process Tanks Solidification Plan, dated March 31, 2015 (IWP 2015).
- Operating Procedure SCWW-03, Domestic Waste Process Tanks Solidification Plan, dated March 31, 2015 (DWP 2015).

These documents were developed to address the contents of 94 portable 500 barrel (bbl) baker tanks, 7 on-Site clarifier processing tanks, and 92-120 bbl "poly" tanks. The procedures outline the processes by which the contents of these tanks would be safely monitored, tested for analytical parameters, emptied, cleaned and non-hazardous wastes properly disposed of to an approved landfill facility, all under the oversight and approval of the County.

Copies of all EUA submittals and correspondence are on file with the County.

1.3 EUA Compliance

As a condition of the EUA, various compliance requirements were imposed by the County, including the following:

- Condition 7: required SCWW to retain the services of an independent Certified Testing Laboratory (CTL) accredited by the California Department of Public Health.
- Condition 8: required SCWW to submit a sampling plan to the County for review and approval, and to submit hazardous waste determination (HWD) reports based upon the analytical findings.
- Condition 9: required SCWW to provide VCEHD a minimum of 24 hours notice for all material sampling and removal activities.
- Condition 12: required SCWW to submit written daily reports to the VCEHD in conformance with Section 9.0 of both the DWP and the IWP plans during waste handling and removal activities.
- Condition 14: required SCWW to submit, upon completion of the handling and removal activities, a final EUA report.

1.4 Certified Laboratory

BC Laboratories, Inc (BCL) provided field staff to conduct all sampling required on the Site during the duration of the project. BCL's reports were delivered directly to the Ventura County Environmental Health Department (VCEHD), and were also separately conveyed to VCEHD by SESPE via emails or in HWD reports.

1.5 Hazardous Waste Determination (HWD) Reports

Each tank/clarifier was tested for the following laboratory parameters as required by Condition 8:

- Inorganic Persistent and Bioaccumulative Toxic Substances (CAM 17 Metals)
- Volatile Organic Compounds - EPA 8260
- pH
- Acute Aquatic 96-hour LC 50 Bioassay
- Radiochemistry (gross beta analysis)

Numerous HWD reports were submitted to VCEHD, including requests by SCWW for approval to clean the various on-Site tanks. In general, VCEHD responded in writing to the HWD reports and would either approve or deny the findings. In some instances, additional testing was required. SCWW complied with these requirements and copies of all HWD reports are on file with the County.

1.6 60-Day Progress Reports

The EUA extension, granted by the County on January 28, 2016, added a requirement to submit 60-day progress reports describing work completed and outstanding tasks. SCWW complied with this requirement and copies of all 60-day progress reports are on file with the County.

1.7 Tank Cleaning Documentation

Condition 14 required, among other things, that an accounting be made of the materials removed from the tanks, amount of water added to the materials removed, and the amount of sorbent (mulch) used (each by weight). SCWW staff maintained a tank manifest log sheet for the baker tanks and clarifiers. A copy of these log sheets is attached as Appendix 1.

2.0 BAKER TANK CLEANING

All work performed by SCWW in connection with the emptying, cleaning and disposal of waste from baker tanks at the Site was completed pursuant to notices to and approvals by the VCEHD. During this process, numerous HWD reports were submitted to VCEHD, including requests for County approval to proceed with any proposed cleaning activities. Generally, the County responded in writing to the HWD reports and would either approve or deny the cleaning of select tanks. SCWW complied with the County's requirements and copies of all HWD reports are on file with the County.

2.1 Non-Hazardous Waste Disposal

Upon approval from the County to clean and dispose of tank contents as non-hazardous waste, there were several possible steps involved with the process, including: bulk liquid removal, sludge/solids removal, and final tank cleaning. Various disposal facilities, depending upon waste type, were used including:

- Simi Valley Landfill
- Green Compass Environmental Services – Orange County Facility
- Saugus Liquid Waste Disposal
- Chiquita Landfill
- Avalon Environmental Services

Manifests for wastes sent to these facilities are attached in Appendices 2 - 6. In addition, mulch was used as the primary material to help solidify sludge/solids. In early 2017, Simi Valley landfill changed its policy on the use of mulch and required that soil be used for mixing. SCWW obtained its mulch from Agromin (see Appendix 7) and soil from Santa Paula Materials (see Appendix 8).

2.2 Skim Oil Tanks

In a letter dated August 18, 2015, SCWW requested approval from VCEHD to skim and sell oil in tanks 85 and 86. VCEHD approved the sale and transfer of the oil on August 21, 2015. The oil was collected in a vacuum truck and transferred to 25 Hill Properties in Taft, California, an oil production company. SCWW complied with the County's requirements with respect to all oil skim activities, and copies of relevant correspondence are on file with the County. See Appendix 9 for manifests.

Additional oil skim and transfers took place, with County approval, as follows:

- February 1, 2016: County approved skimming of crude oil in tanks 45, 73, 76, and 77 and transfer of the oil to tank 86. From tank 86, the oil would be collected in a vacuum

and transferred to 25 Hill Properties.

- March 9, 2016: County approved request to sell crude oil from tank 86 to 25 Hill Properties, and continued use of tank 86 as a skim oil consolidation tank for oil skimmed from other on-Site tanks. SCWW was required to analyze the contents of tank 86 for TCLP Benzene.
- April 18, 2016: County approved skimming of crude oil from 14 tanks on the Site, and transfer of the contents to tank 86.
- May 25, 2016: County approved request to skim oil from 7 tanks on the Site, and transfer of the contents to tank 86, and further to clean and rinse out the contents of the 7 tanks into 1-2 tanks. SCWW was required to analyze the contents of the consolidation tanks for TCLP Benzene.
- July 25, 2016: County approved revised request for oil skimming and consolidation.

2.3 Oil Skimming Transfers to 25 Hill Properties in Taft, CA

Transfers of skimmed crude oil to 25 Hill Properties occurred on the following dates, in the following quantities:

- 9/16/15: 40 bbls and 165 bbls
- 3/24/16: 110 bbls and 110 bbls
- 4/1/16: 110 bbls, 110 bbls and 110 bbls
- 4/8/16: 110 bbls, 75 bbls, 115 bbls, 110 bbls
- 4/29/16: 100 bbls, 110 bbls and 110 bbls
- 4/1/16: 110 bbls, 110 bbls and 110 bbls
- 5/6/16: 110 bbls, 100 bbls and 110 bbls
- 5/27/16: 50 bbls 50 bbls
- 6/2/16: 110 bbls, 110 bbls and 100 bbls
- 6/10/16: 110 bbls, 100 bbls and 100 bbls
- 6/20/16: 110 bbls, 110 bbls and 100 bbls
- 1/12/17: 114 bbls
- 3/13/17: 80 bbls
- 8/10/17: 80 bbls
- 9/13/17: 55 bbls
- 10/10/17: 25 bbls

As noted above, SCWW complied with the County's requirements with respect to oil skimming activities and transfers, and copies of relevant correspondence and manifests are on file with the County.

2.4 Final Benzene TCLP Tanks

After all of the oil skimming and consolidation efforts, tanks 14-18 were the final tanks that required a benzene TCLP analysis. Some additional oil skimming from these tanks was also conducted. This work was performed pursuant to and in compliance with requirements set forth in written or verbal correspondence with VCEHD between August 25 – October 25, 2017.

2.5 SCWW Regulatory Discussion of the Benzene TCLP Testing Results

As set forth in prior correspondence to the County, SCWW has consistently asserted that all materials stored in on-Site baker tanks were derived from oil field production, and therefore were subject to the crude oil exploration and production (E&P) hazardous waste exclusion set forth in Title 40, Code of Federal Regulations, Section 261.4(b)(5) and Title 22, California Code of Regulations, Section 66261.4(b)(2). While the County disagreed, SCWW reserves all rights regarding its previous legal, factual and technical arguments.

2.6 HWD Report for the Benzene TCLP Tanks

On behalf of SCWW, SESPE submitted a HWD to VCEHD on December 22, 2017, documenting the results of all previous sampling results for certain on-Site tanks. The results from the analyses conducted by BCL determined that the contents of tanks 14, 15, and 18 were non-hazardous; the County concurred and the contents of these tanks were disposed of as non-hazardous waste.

To facilitate timely site closure, and with VCEHD's approval, the residual contents of tanks 16 and 17 were removed and disposed of as hazardous waste to DeMenno/Kerdoon (D/K) in Compton, CA. Copies of relevant correspondence are on file with the County and copies of the D/K manifests are found in Appendix 10[1]. It should be noted, pursuant to section 2.5 above, that SCWW disputed, and continues to dispute, characterization of these wastes as hazardous pursuant to the E&P exclusion, and reserves all rights regarding its previous legal, factual and technical arguments. The manifests to D/K confirm that SCWW disputed VCEHD's determination and that the wastes were disposed of as hazardous solely to expedite a resolution of the waste characterization dispute with VCEHD.

[1]*Appendix 10 includes two sheets from each of the D/K manifests. One copy set provided by Clean Harbors is more legible, but does not include handwritten notes prepared concurrently on the manifest copy sheets by Mike Legan of SCWW reserving rights with respect to waste characterization issues.*

3.0 POLY TANKS

In addition to the baker tanks, there was also an inventory of 77 "poly" tanks on the Site that generally contained processed waste. The poly tanks measured 5,000 gallons in size, or 120 bbls, and the level or volume of each tank varied.

The protocols for addressing these tanks, and sampling their contents, were established with the County's approval, as follows:

- January 9, 2017: County approves SESPE's request to initiate sampling of the 77 poly tanks pursuant to a sampling plan. Sampling results were summarized in a Hazardous Waste Determination Report, dated March 27, 2017, which is on file with the County. The BCL testing results showed contents of all of the sampled tanks were non-hazardous.

  April 26, 2017: County concurred with the HWD findings, and approved emptying and cleaning of the tanks, with the contents to be disposed of as non-hazardous waste. SCWW transferred the contents from the poly tanks to large Baker tanks and then

rinsed clean all of the poly tanks. All rinse water from the poly tanks was collected and transported to Avalon Environmental, in Gardena, CA. Solids were solidified in the on-Site mixing pit and the contents were transported to Chiquita Landfill, in Simi Valley, CA.

SCWW complied with the County's requirements with respect to the poly tanks, and copies of relevant correspondence and manifests are on file with the County.

4.0 CHEMICAL TOTES

There were a number of chemical poly totes the existed on the Site. The totes measured approximately 275 gallons, and varied in size. Many of these totes were originally inventoried in December 2014 by Center for Toxicology and Environmental Health (CTEH). The CTEH inventory accounted for 64 separate containers, which included chemical totes (raw materials), process totes, along with several poly tanks and a 55-gallon drum.

These materials were moved by the cleanup contractor in late 2014 and early 2015 to the southern portion of the Site where they were stored in rows, on visqueen, and segregated by material type (corrosive, flammable, oxidizer, polymer, empty). As cleanup of the Site progressed, additional containers and materials were also relocated to the southern portion of the Site.

4.1 Ventura County Fire Protection District Permit

During the EUA process, County Planning requested the relocation of all materials stored on the southern portion of the Site. In January 2016, SCWW submitted an application for a Fire Code Permit to Ventura County Fire Protection District, authorizing storage of the chemical totes in three different areas on the northern portion of the Site covered by the existing CUP. The storage areas were designated by material type (acid, peroxide, corrosive/flammable/other). The Fire Department conducted an inspection and issued the final approved Fire Code Permit on March 15, 2016. Thereafter, the chemical totes were moved to their new storage locations at the end of March 2016. A collection of other empty/mostly empty totes were moved to a new location on the south side of the poly tanks.

SCWW obtained bids from contractors to remove the chemical totes. On August 9, 2017, SESPE submitted a Request to Remove the Chemical Totes to VCEHD, seeking approval to have a waste disposal contractor properly remove and dispose the chemical totes.

On December 20 and 27, 2017, Clean Harbors removed all of the chemical totes and some small containers containing waste materials, which were transferred to various Clean Harbors facilities. Copies of these manifests are found in Appendix 11.

On January 12, 2018, SESPE submitted a letter to the Fire Department to revoke the Fire Code Permit. Ms. Marnel Vanden Bossche processed this request and conducted a site inspection on January 18, 2017 to verify all hazardous materials had been removed from the Site. Per email correspondence dated January 18, 2018, Ms. Vanden Bossche confirmed the permit was revoked.

4.2 Petromax

An inventory of a chemical called "Petromax" was found in a storage container on the Site by VCEHD

during an inspection on November 6, 2015. The Petromax inventory included nineteen 275-gallon totes and seven 55-gallon drums.

On January 26, 2017, SCWW arranged for proper disposal of the entire Petromax inventory to the Clean Harbors facility in Buttonwillow, California. Hazardous waste labels were applied to all of the Petromax containers, which were removed under a Uniform Hazardous Waste Manifest and generator ID Number of CAC002893261. It should be noted that SCWW disputed, and continues to dispute, characterization of these wastes as hazardous pursuant the detailed legal and technical arguments previously submitted, and reserves all rights regarding its previous legal, factual and technical arguments. Along these lines, the manifest stated as follows: "This inventory of Petromax is being removed and disposed of under this manifest solely in response to a Notice issued by the County of Ventura; and SCWW reserves all rights and makes no admissions or waivers of rights in doing so."

SCWW complied with the County's requirements with respect to removal and disposal of the Petromax, and copies of relevant correspondence and manifests are on file with the County.

4.3 Sodium Chlorite Tote

On November 7, 2017, VCEHD approved the emptying, disposal and cleaning of the sodium chlorite tote. SCWW emptied and rinsed the tote and transferred the residual and wash out material into a new, clean 55-gallon drum. The drum was picked up by Clean Harbors on December 27, 2017, along with other waste containers as referenced above. The original and cleaned sodium chlorite tote was wrapped with visqueen and labeled, and is currently being stored south of clarifier 6 (C6).

SCWW complied with the County's requirements with respect to removal and disposal of the sodium chlorite tote, and copies of relevant correspondence and manifests are on file with the County.

5.0 COUNTY INSPECTIONS

VCEHD conducted CUPA (Certified Unified Program Agency) inspections on November 6 and December 9, 2015, and July 8, 2016.

SCWW responded to and has addressed the County's comments as set forth in VCEHD's Inspection Report/Notice to Comply for each inspection, including detailed correspondence on various issues. Copies of these inspection reports and all relevant correspondence are on file with the County. It should be noted that SCWW disputed, and continues to dispute, various of the County's findings as set forth in the detailed legal and technical arguments previously submitted, and reserves all rights regarding its previous legal, factual and technical arguments.

5.1 California Environmental Reporting System (CERS) Update

On January 5, 2018, SCWW updated the online CERS account for the Site. Specifically, the Business Activities document was updated to reflect that no hazardous materials remain on the Site.

6.0 POST EUA CLOSURE

Currently there are no operations at the Site. SCWW is currently in the process of seeking a modified CUP from County Planning. In the interim, the Site will remain vacant during this CUP processing period. Security is maintained by many motion-activated cameras that are located throughout the property and monitoring by Bay Alarm.

Figure 1 depicts the current Post-EUA site.

E = Electrical
C = Camera Location
I = Sodium Chlorite Tote # 10 Location (Empty/Clean)
SC = Shipping Container (Storage)
OW = California Resources Production Oil Well "585" 17

All Baker Tanks Empty
All Poly Tanks Empty
All Clarifier Tanks Empty

N	SITE AERIAL SCWW 1/5/18 aerial (revised)	SESPE CONSULTING, INC	
FIGURE	1	DATE:	
SCALE:	NA	DRAWN BY:	

SCWW facility as of 01-08-18 rotated.xlsx

1/23/2018 - 11:11 AM

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division
Kimberly L. Prillhart
Director

NOTICE OF VIOLATION

Santa Clara Waste Water Treatment Facility

CONDITIONAL USE PERMIT NO. LU11-0011
(Modification of CUP 960-2)

Please Reply to:
Franca Rosengren
(805) 654-2045
FAX (805) 654-2509
Franca.Rosengren@ventura.org

August 10, 2015

Green Compass
(Santa Clara Waste Water)
Attn: Bill Mitzel
2775 North Ventura Road, Suite 209
Oxnard, CA 93036

SUBJECT: **Violation Case No.**: PV15-0020
Assessor's Parcel No.: ("APN") 099-0-060-165
Permit No.: LU06-0011 (Modification CUP No. 960)
Location: 815 Mission Rock Road, Santa Paula

Dear Mr. Mitzel:

The Planning Division confirmed that violations of the Ventura County Non-Coastal Zoning Ordinance (NCZO) and the conditions of approval of Conditional Use Permit (CUP) LU06-0011 exist on the subject property.

CUP LU06-0011 was granted by the Ventura County Planning Commission on July 29, 2010 to authorize an upgrade of the existing waste water treatment facility (Santa Clara Waste Water) by changing the operations from an open aeration pond system to a closed tank vessel system, and for the abatement of Zoning Violation Case No. ZV87-0027 for the expansion of the facility without the required permits.

The violations of CUP LU06-0011 identified to exist at the SCWW facility are discussed below along with the relevant code sections or permit conditions:

1) **Expansion of the Santa Clara Waste Water Treatment Facility (SCWW) beyond the approved boundaries set forth in CUP No. LU06-0011.**

Section 8101-3.1 of the Non-Coastal Zoning Ordinance (NCZO) [in part]:
No structure shall be moved onto a site, erected, reconstructed, added to, enlarged, advertised on, structurally altered or maintained, and no structure or land shall be used or maintained for any purpose, except as specifically provided and allowed this Chapter[...].

Condition No.4 of LU06-0011(CUP Modification) [in part]:
Prior to undertaking any operational or construction-related activity which is not expressly described in these conditions or applicable exhibits, the permittee must contact the Planning Director to determine if the activity requires a modification of this CUP. The Planning Director may, at the Planning Director's discretion, require that the permittee file a written and/or mapped description of the proposed activity prior to rendering a decision on whether a CUP modification is required. [...]

The SCWW facility is authorized to operate only within the area encompassed by the CUP boundary line delineated on the approved project plans. The authorized permit area coincides with the limits of Assessor's Parcel No. (APN) 099-0-060-165.

At the July 29, 2015 site inspection, Planning staff observed that the facility has expanded beyond the approved CUP boundary line onto approximately 1.67 acres of adjacent land on the adjoining parcels (APNs: 099-0-060-495, -515 and -045). The expansion includes the storage of facility equipment, above-ground piping, and installation of new impervious surfaces (i.e. concrete). A concrete truck loading area has been constructed in a manner that requires the use of the adjoining property located outside of the permit area. According to the Planning Division's records, the expansion of the facility has occurred without the required County permits.

Abatement can be achieved by:

The permittee shall remove all equipment and structures associated with the operation of the SCWW facility from the area outside of the permit boundary specified in CUP LU06-0011 within 30-days of the date of this letter. This includes the area encompassed by APNs 099-0-060-495, -515, and -045. Failure to remove all equipment and structures located in the un-permitted expanded operation area within 30 days of the date of this letter will result in a Notice of Non-compliance recorded against the property. **However, equipment and materials used as part of the site clean-up activities authorized by the April 20, 2015 Emergency Use Authorization (EUA) issued by the County Planning Division may remain on the subject properties while the EUA is in effect. The equipment or materials allowed to remain will be at the discretion of the County Planning Director.**

The Planning Division understands that the permittee would like to expand the SCWW facility to include the area encompassed by APNs 099-0-060-495, -515, and -045. If this is the case, please submit a revised project description and site plan that includes the proposed expansion area as part of the PL15-0106 application. Until authorized by the County, no equipment or structures shall be installed, used or stored in the un-permitted expansion area.

2) **The required on-site landscaping has not been installed or maintained.**

Sec. 8109-0.6.4 (d) of the NCZO:
(d) At least five percent of any permit area in the M2 or M3 zone shall be landscaped.

Condition No. 22(b) and (c) (Landscape Requirements) [in pertinent part]:
(b) [...] the permittee shall install all landscaping, irrigation systems, and plantings according to the Planning Director-approved landscape and planting plan.
(c) The Permittee shall maintain all landscaping, irrigation systems, and plantings according to the Planning Director-approved landscape and planting plan [...].

Condition No. 31(g) (Landscape Areas):
Landscaped areas shall be designed with efficient irrigation to reduce runoff and promote surface filtration and minimize the use of fertilizers and pesticides that can contribute to urban runoff pollution. Unless otherwise recommended in the soils report, on-site stormwater discharges (including roof drains if applicable) shall be directed toward landscaped areas to the maximum extent practicable.

At the site inspection, Planning staff observed that none of the required on-site landscaping had been installed or maintained at the facility. The July 29, 2010 approved site plan depicts a 20-foot wide, 2-foot high landscape berm along the edges of the permit area. Additionally, the approved landscaping plan, dated November 5, 2013, requires the following California native plant species to be planted: Yucca, Desert Olive, and Big Sagebrush. This required landscaping has not been installed.

Abatement can be achieved by:

The permittee shall submit a revised project description and site plan as part of the permit modification application (PL15-0106) which includes either of the following:

(1) the previously-approved landscape and planting plan; or,
(2) a modified landscape and planting plan.

Upon the granting of a modified conditional use permit and installation of the required landscaping, the violation will be abated.

3) A freestanding sign has been erected without the required permits.

Section 8101-3.1 of the NCZO (in part):
No structure shall be moved onto a site, erected, reconstructed, added to, enlarged, advertised on, structurally altered or maintained, and no structure or land shall be used or maintained for any purpose, except as specifically provided and allowed this Chapter[…].

Condition No. 19 of LU06-0011 (in part):
[…] the permittee shall submit two copies of a Sign Plan to the Planning Division for review and approval by the Planning Director. The Sign Plan must comply with Chapter 1, Article 10 of the Ventura County Ordinance Code. The Sign Plan must include the proposed size, colors, materials, and lighting details […].

At the site inspection, Planning staff observed a Green Compass freestanding sign located adjacent to the entrance to the SCWW facility. According to the Planning Division records, no sign plans have been submitted for review and approval.

Abatement can be achieved by:

The permittee shall submit a revised project description and site plan as part of the permit modification application (PL15-0106) which includes the legalization of the unpermitted freestanding sign. Upon the granting of a modified conditional use permit, the violation will be abated.

If you do not believe a violation exists and wish to appeal this determination and stay further enforcement actions, you must submit your appeal to the Planning Division by August 24, 2015. The current cost for an appeal is $1,000 deposit (with no billing limit), but if your appeal is upheld then all of your appeal fees will be refunded. You must also fill out and submit an appeal application with the deposit fee. You may also request an Informal Office Hearing, the cost of which is currently a $500 deposit with staff costs billed at the current hourly charge rate.

Now that a violation has been confirmed, the following enforcement actions will be instituted and remain in effect until the violations are abated to the Condition Compliance Officer's satisfaction:

- Each day counts as a new violation for purposes of fines, and penalties that may be assessed if Civil Administrative Penalties are imposed.

- No new Planning or Building permits will be issued on the subject site except to correct a violation.

- The full costs for staff time spent abating the violation will be charged to you and any subsequent owners of the property. This means that all time spent for meetings, site visits, telephone calls, correspondence, etc. that relate to this violation case will be charged to you. Since the violation is related to the property, unpaid bills will fall to subsequent property owners if you do not pay the bills. The minimum cost to confirm the abatement of a violation is currently $300, plus the accumulated costs for staff time spent to date seeking abatement of the violation. The current staff charge rate exceeds $150/hour. These costs often reach $1,000 and more when people do not diligently abate the violations.

- You will be formally billed on a monthly basis for the staff costs incurred and assessed 2% interest for unpaid bills compounded monthly. In other words, the costs for unpaid bills will be similar to credit card charges.

- A Late Filing Fee will be required in addition to the required fees for each permit necessary to legalize a non-permitted use and structure. Each Late Filing Fee shall be equal to the cost of each required permit, but shall not individually exceed $1,000.00. These fees will be refunded if the required application is submitted within 30 days and deemed "complete" within 90 days of the Notice of Violation. If the property is located in the Coastal Zone there is no 30-day "grace" period, and a Late Filing Fee is always charged.

- Copies of the Notice of Violation will be sent to applicable Federal, State and local policing, licensing and taxing agencies alerting them to the conditions on your property.

- An Administrative Nuisance Abatement hearing may be set before an independent hearing officer. If the Hearing Officer finds that violations exist, he can order abatement of the violations, payment to the County for all the costs incurred in seeking abatement of the violations, payment of the hearing officer costs (currently exceeds $120/hour), payment of fines and penalties, among other orders. A tax lien can also be placed on the property if the costs are not paid in the required time. The rulings from the Hearing Officer usually result in costs and charges to violators of several thousands of dollars.

- The forfeiture of penal sureties will be sought if such sureties are on deposit with the County.

- Criminal charges may be filed against you. If you are convicted of a misdemeanor violation, it would result in a criminal record, probation, fines, and Court penalties equal to 220% of total fines charged, e.g. a $100 fine becomes a $320 fine.

- As part of a criminal prosecution the County's attorneys may seek and the Court may place the property in "receivership". The Court-appointed receiver would be ordered to correct the violations and be allowed to sell the property to recover the costs of abating the violations if the property owner does not pay for the work and the receiver's costs.

- CUP No. LU06-0011 can be modified or revoked by the Planning Commission or the Board of Supervisors.

- In cases where violations repeatedly occur and then are corrected, the Planning staff may take the permit to the Planning Commission or the Board of

Supervisors for modification, suspension or revocation at the permittee's expense.

- Unpaid bills, fines and penalties will be pursued through Small Claims Court or as tax liens on the property.

We want to work with you to avoid the consequences listed above. I urge you to contact the case planner, Franca Rosengren, for this case, at (805) 654-2045 so she can discuss with you how this issue can be resolved. If you wish to discuss this matter in person, please call for an appointment to be sure she is available. Please reference the "Case No." identified at the top of this letter in all inquiries or replies.

NOTE: It is your responsibility to inform the case planner when your violation(s) has been corrected. Until she hears from you that the violation(s) is corrected and this can be confirmed to her satisfaction, the violations are presumed to remain and enforcement actions against you will continue.

Sincerely,

for Brian R. Baca, Manager
Commercial and Industrial Land Use Permits Section
County of Ventura Planning Division

Attachments: Billing Fact Sheet
Condition Compliance Civil Administrative Penalties Brochure

C: Sespe Consulting, Inc., Attn: Rob Dal Farra, Vice President, 374 Poli Street, Suite 200, Ventura, CA 93001
City of Oxnard Utilities Department, Attn: Daniel Rydberg, 305 W. Third Street, 3rd Floor, Oxnard, CA 93030

Doc. Type	Instrument No
NOTI	20170329-00042693-0

RECORDED AT THE REQUEST OF AND RETURN TO:

COUNTY OF VENTURA
RMA-PLANNING DIVISION L-1740
800 S. Victoria Avenue
Ventura, CA 93009

"NO FEE REQUIRED"
(GOVT. CODE SEC. 6103 & 27383)
Recorded for the benefit of the County of Ventura

Brian R Baca

Authorized Signature

Space above this line for Recorder's Use

RESOURCE MANAGEMENT AGENCY
COUNTY OF VENTURA
800 South Victoria Avenue, L#1740, Ventura, CA 93009 (805) 654-2481 FAX (805) 654-2509

PLANNING DIVISION
KIM L. PRILLHART
DIRECTOR

NOTICE OF NONCOMPLIANCE

March 29, 2017

Violation Case Number: PV15-0020

Permit Number: LU06-0011 (Modification of Conditional Use Permit No. 960)

Property Address: 815 Mission Rock Road, Santa Paula

Assessor's Parcel Numbers: 099-0-060-165, 099-0-060-495, 099-0-060-045, 099-0-060-515

Current Record Owner of the Property: Santa Clara Waste Water Company, a California Corporation

Property owner as recorded in Document Number 20150917-00139623-0, of the Official Records of the County of Ventura as of September 17, 2015.

The following violations of the Ventura County Non-Coastal Zoning Ordinance (NCZO) and the conditions of approval of Conditional Use Permit (CUP) LU06-0011 have been identified in connection with the above described property and continue to exist.

1) **Expansion of the Santa Clara Waste Water Treatment Facility (SCWW) beyond the approved boundaries set forth in CUP No. LU06-0011.**

Section 8101-3.1 of the Non-Coastal Zoning Ordinance (NCZO) [in part]:
No structure shall be moved onto a site, erected, reconstructed, added to, enlarged, advertised on, structurally altered or maintained, and no structure or land shall be used or maintained for any purpose, except as specifically provided and allowed this Chapter[...].

Condition No.4 of LU06-0011(CUP Modification) [in part]:
Prior to undertaking any operational or construction-related activity which is not expressly described in these conditions or applicable exhibits, the permittee must contact the Planning Director to determine if the activity requires a modification of this CUP. The Planning Director may, at the Planning Director's discretion, require that the permittee file a written and/or mapped description of the proposed activity prior to rendering a decision on whether a CUP modification is required. [...]

The SCWW facility is authorized to operate only within the area encompassed by the CUP boundary line delineated on the approved project plans. The authorized permit area coincides with the limits of Assessor's Parcel No. (APN) 099-0-060-165.

At the July 29, 2015 site inspection, Planning staff observed that the facility has expanded beyond the approved CUP boundary line onto approximately 1.67 acres of adjacent land on the adjoining parcels (APNs: 099-0-060-495, -515 and -045). The expansion includes the storage of facility equipment, above-ground piping, and installation of new impervious surfaces (i.e. concrete). A concrete truck loading area has been constructed in a manner that requires the use of the adjoining property located outside of the permit area. According to the Planning Division's records, the expansion of the facility has occurred without the required County permits.

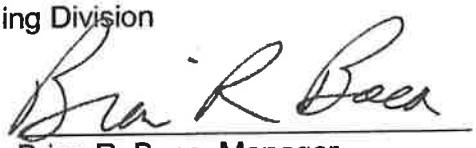
Abatement can be achieved by: The permittee shall remove all equipment and structures associated with the operation of the SCWW facility from the unpermitted expansion area; or obtain approval from the appropriate decision-making body to authorize the modification of LU06-0011 to expand of the permit boundaries of the SCWW facility.

The owner of record was notified in writing on August 10, 2015, of the County's intention to record a Notice of Noncompliance if the violations were not abated.

Pursuant to Section 8114-3.6 of the Non-coastal Zoning Ordinance Code, the Planning Director shall cause a release of Notice of Noncompliance to be recorded with the County Recorder when it is determined that the above noted violations, and any others that might exist, have been abated to the satisfaction of the Condition Compliance Officer; the

current fee for recordation of the Release of Notice of Noncompliance has been paid; and the County's costs incurred in the abatement of violations on the site (including interest and late charges) have been paid.

COUNTY OF VENTURA
By Kim L. Prillhart, Director
Planning Division

By: 

Brian R. Baca, Manager
Commercial and Industrial Land Use Permits Section
County of Ventura Planning Division

cc: Condition Compliance File
Rob Dal Farra, Vice President, Sespe Consulting, Inc., 374 Poli Street, Suite 200, Ventura, CA 93001
Paul Kromwyk, C.F.O., Patriot Environmental Services, 508 East E Street, Unit A, Wilmington, CA 90744
Bill Mitzel, Santa Clara Waste Water Company, 2775 North Ventura Road, Suite 209, Oxnard, CA 93036

VENTURA COUNTY CLERK AND RECORDER
Hall of Administration, Main Plaza
800 South Victoria Avenue
Ventura, CA 93009
805-654-2295 http://recorder.countyofventura.org

MARK A. LUNN

CLERK AND RECORDER

Receipt for Services

Cashier	CORRALE	**Batch #**	1182954
Customer	VENTURA COUNTY PLANNING DIVISION	**Date:** 03/29/2017	**Time:** 03:33:28PM

Doc. Type	Instrument No	GF Number	Rec Fees	PCOR	Survey Fees	Taxes	Total
NOTI	20170329-00042693-0		0.00	0.00	0.00	0.00	0.00
					Total Fee:		**0.00**