

Notice of Completion & Environmental Document Transmittal

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SCH #

Project Title: Modification of Conditional Use Permit 960, as previously modified by LU06-0011 (Case No. PL15-0106)

Lead Agency: Ventura County Planning Division Contact Person: Franca A. Rosengren
 Mailing Address: 800 S. Victoria Avenue, L#1740 Phone: 805-654-2045
 City: Ventura Zip: 93009 County: Ventura

Project Location: County: Ventura City/Nearest Community: City of Santa Paula
 Cross Streets: Shell Road and Mission Rock Road Zip Code: 93060
 Longitude/Latitude (degrees, minutes and seconds): _____ ° _____ ' _____ " N / _____ ° _____ ' _____ " W Total Acres: 6.97
 Assessor's Parcel No.: 099-0-060-565 Section: _____ Twp.: _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy #: 126 Waterways: Santa Clara River
 Airports: N/A Railways: Santa Paula Branch Line RR Schools: Briggs School District

Document Type:

CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) _____ Draft EIS Other: _____
 Mit Neg Dec Other: _____ FONSI

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other: _____

Development Type:

Residential: Units _____ Acres _____ Transportation: Type _____
 Office: Sq.ft. _____ Acres _____ Employees _____ Mining: Mineral _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____ Power: Type _____ MW _____
 Industrial: Sq.ft. _____ Acres 6.97 Employees 40 Waste Treatment: Type non-hazardous wastewater MGD _____
 Educational: _____ Hazardous Waste: Type _____
 Recreational: _____ Other: _____
 Water Facilities: Type _____ MGD _____

Project Issues Discussed in Document:

Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: _____

Present Land Use/Zoning/General Plan Designation:

Existing Wastewater Treatment Facility, M-3 Zone (General Industrial), Industrial General Plan Designation

Project Description: (please use a separate page if necessary)

See NOC separate project description document.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X". If you have already sent your document to the agency please denote that with an "S".

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| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input checked="" type="checkbox"/> Caltrans District # <u>7</u> | <input type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input checked="" type="checkbox"/> Regional WQCB # <u>4</u> |
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| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input checked="" type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> General Services, Department of | <input type="checkbox"/> Other: _____ |
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| <input type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date 10-14-2021 Ending Date 11-30-2021

Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

Signature of Lead Agency Representative: *Maria A. Paenggen* Date: 10-6-2021

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

NOC Project Description
Case No. PL15-0106
Applicant: RI-NU Services, Inc.

The applicant requests the reinstatement and modification to CUP 960 to authorize the continued operation of, expansion of, and various operational safety changes to, the existing wastewater treatment facility (NCZO section 8105-5, "Community Wastewater Treatment Facility") (Case No. PL15-0106) until August 30, 2040.¹

The applicant seeks to continue to accept, treat and dispose offsite by trucks various types of non-hazardous waste streams. Accepted non-hazardous wastes will be treated on site to separate solids and liquids, consolidate treated wastes and truck the treated wastes to other off-site disposal facilities. Wastes, from each type of waste stream, will be treated to a level acceptable by the off-site receiving facilities.

Historically, the subject facility discharged treated wastewater into an existing 12-mile sewer discharge pipeline connected to the City of Oxnard's Wastewater Treatment Plant. The use of this pipeline is no longer a part of this project.

Non-Hazardous Waste Streams Accepted

The following domestic and industrial non-hazardous waste streams are proposed to be treated at the wastewater treatment facility in accordance with local, state, and federal requirements that regulate the safe handling of equipment, and the treatment and disposal of these types of waste streams:

- Domestic Wastes: Wastes such as septic tank waste, port-a-potty waste and secondary sewage.
- Industrial Wastewater Containing Metals (40 Code of Federal Regulations (CFR) Part 437 Subcategory A wastes): Wastes such as neutralized acid wastewater, boiler blowdown brine, and metal finish wastewater.
- Industrial Wastewater Containing Organics (40 CFR Part 437 Subcategory C wastes): 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.
- Oily Wastewater (40 CFR Part 437 Subcategory B wastes): 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.
- Oilfield Sludge Wastes: This category includes the following:

¹ CUP 960, as previously modified by LU06-0011, was originally approved to authorize the operation of the SCWW facility until August 30, 2040.

- Oilfield Drilling Muds: Used drilling muds and cuttings generated during the drilling of oil and gas wells.
- Oilfield Tank Bottoms: Solids removed from the bottom of storage tanks used in the production of crude oil.

Non-Hazardous Waste Acceptance Practices

Industrial waste generators (i.e., the facility's customers) will be required to conduct laboratory analysis of their waste streams to ensure they are not hazardous waste prior to sending them to the facility for treatment and disposal. The waste generators will submit a "profile application" of the proposed waste stream to the facility for approval. The waste generators will also submit an actual sample of the proposed waste stream to the facility. The applicant will compare the waste stream sample to the profile description and will conduct internal sample analyses in the proposed in-house laboratory to compare to the third party analytical submitted by the waste generator. The proposed in-house laboratory will be used only for internal testing and will not be a state-certified laboratory used for complete waste profiling.

The applicant will also conduct bench scale treatability testing to ensure the treatment process can reduce the waste stream contaminants to a level acceptable by the off-site receiving facilities. Even if the waste stream proves to be non-hazardous, if it cannot be treated sufficiently, it will not be accepted at the facility. If the physical inspection of the waste stream sample matches the profile description and the facility's in-house laboratory analyses are consistent with the third-party analytical results, the applicant will allow the generator to schedule delivery of the waste to the facility by appointment.

All wastes will continue to be delivered by truck to the facility. When a waste generator's truck arrives at the facility to transfer the waste, the facility will conduct the following check for each load:

- a. A sample of the waste stream will be taken from the delivery truck before it is unloaded and physically compared to the original waste stream sample supplied by the generator.
- b. The facility's in-house laboratory will then conduct additional "fingerprint" analyses of the sample from the delivery truck. This may include checking pH, flash point, metals content, etc.

If the waste load fails either the physical inspection or the analytical "fingerprint" check, it will be rejected, and the truck will leave the facility without unloading the waste. The load check process will take approximately 30 minutes to complete.

Attachment 10 of the Initial Study includes the waste streams process flow diagrams.

Unloading of Non-Hazardous Wastes Process

Trucks, other than those carrying domestic waste, will unload at the main offloading area located at the southern side of the facility. The trucks will unload via hose into a piping manifold that leads to waste receiving tanks. The main offloading area is paved and bermed. Domestic waste will be offloaded using hoses into cone bottom tanks at the domestic sewage area. The piping manifold for unloading domestic sewage will be located within the bermed area proposed to surround the domestic waste cone bottom

receiving tanks. Other than the use of hoses to unload waste hauling trucks, transfer of fluids and waste materials to and from the waste processing equipment will be via pumps and hard piping in conformance with local, state, and federal regulations.

Solid wastes such as drilling muds and cuttings generated during the drilling of oil and gas wells will be unloaded directly into the solid waste mix areas, located near the center of the facility, for treatment with other solids generated during the waste treatment process.

Hazardous materials (chemicals) used during the waste treatment process will be stored near the point of use in "day tanks" which will be placed on top of spill containment trays. These day tanks will be hard piped into the process equipment. The day tanks will be refilled, as needed, from the hazardous materials containers stored in the proposed hazardous materials storage building. For safety reasons, all other 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.

Loading of Treated Non-Hazardous Wastes for Shipment Offsite

Trucks being loaded to ship treated wastes offsite will be loaded in the central area of the facility located south of the treated waste storage tanks. This central area is paved and graded to a low point and provides spill containment. The trucks will load via a hose connected to a manifold that is hard piped to the treated waste storage tanks.

Treated domestic waste will also be loaded into trucks for off-site shipment using hoses that originate from the bermed domestic sewage storage area.

Treatment Methods for Non-Hazardous Wastes

The facility will utilize separate treatment systems for industrial and domestic wastes.

The proposed treatment methods for industrial waste include:

- Dewatering with shakers and centrifuges;
- Solids settling and removal using clarifiers;
- pH adjustment using either acid or base;
- Metals removal using hydroxide precipitation (adjusting pH to make metal compounds insoluble and precipitate from solution);
- Oil skimming using an oil-water separator;
- Organics and residual oil removal using a gas energy mixing (GEM) system. A polymer is added before the liquids are sent through the GEM system. The GEM system uses air and the polymer to form a flocculent which floats organics and solids to the surface for skimming and removal;
- Organics oxidation through ozone oxides the organics converting them to water and carbon dioxide; and,
- Additional filtration utilizing bag filters, sand filters, organo-clay filters and granulated activated carbon filters.

Prior to treatment, waste streams will be tested at the facility and characterized as either 40 CFR part 437 Subcategory A, B, or C wastes depending on the levels of metals, organics, and oil found in the waste streams. Sludges generated by the waste treatment process are de-watered and/or mixed with clean, inert material and hauled offsite to a licensed landfill for ultimate disposal. Solids generated from industrial and oilfield waste

treatment will be sent to the Chiquita Canyon landfill in Castaic operated by Waste Connections. The treated non-hazardous industrial wastewaters generated by the waste treatment process will be trucked offsite to other fully permitted, approved third-party non-hazardous disposal facilities depending on the sources of the waste and the levels of remaining contaminants. Prior to transporting the treated wastes offsite for disposal, the applicant may be required to conduct laboratory analysis of their treated waste streams to ensure they meet the acceptable criteria required by the off-site receiving facilities. Each receiving facility will have their own acceptance criteria based on the wastewater treatment plant that they discharge to.

The proposed treatment methods of domestic waste include:

- Use of screens to remove large solids; and,
- Solid/liquid separation with a centrifuge.

The proposed domestic waste treatment system will be enclosed and designed to minimize odorous emissions. Solids will be dropped from the centrifuge through an enclosed chute into a closed top bin and liquids will be sent to closed tanks. Bins of solids generated from domestic waste treatment will be sent to the Waste Management landfill in Simi Valley. Liquid domestic wastes will be bulked into tanker trucks and sent offsite for disposal to other fully permitted, approved third-party non-hazardous disposal facilities.

Proposed Modifications of CUP 960 (as previously modified by LU06-0011)

The applicant requests the following modifications to the existing permit:

- Expansion of the facility's operational boundary: In order to abate Violation Case No. PV15-0020 (see Attachment 5 of the Initial Study), the requested modified CUP would legalize the unpermitted expansion of the facility's operational boundary by 1.67 acres. With the proposed expansion, the facility's operational boundary will encompass a total of 6.56 acres. Within the 1.67-acre expansion area, the applicant proposes a total of 29,362 sq. ft. of impervious surface: 26,335 sq. ft. was installed without permits and is proposed to be legalized (validated), and 3,027 sq. ft. of new impervious surface will be installed. Within the current permit boundary, there is a total of 104,566 sq. ft. of existing impervious surface. As part of the modification request, the applicant proposes the addition of 1,825 sq. ft. of impervious surface within the current permit boundary. The total impervious surface area of the current and the expansion permit area will be 135,753 sq. ft.
- Redesign the layout and operation: The applicant proposes to re-design the layout and operation of the existing facility so that the facility may operate safer, more efficiently, and the waste processing equipment is located further from the agricultural zoned areas that border the project site. The reconfiguration of the facility will occur in one phase that is expected to take six to nine months to complete, and includes the relocation of processing operations closer to the

center, eastern and northern portions of the site and utilizing the southwest corner for administrative office functions.²

- Removing, replacing, and adding new equipment and structures: Some existing equipment (i.e., old tankage and processing equipment) will be removed and replaced with new equipment. As part of the re-design of the facility, new updated equipment will also be installed. The facility will include over 1,000,000 gallons of tank storage capacity onsite at any one time (refer to Tables 1 and 2 below for a list of equipment).

Tables 1 and 2 below identify the existing and proposed equipment and structures, respectively, the sizes of each, and an identification marker that correlates to the proposed site plan of the facility (Attachment 11 of the Initial Study). The proposed re-design of the facility includes fewer tanks and less processing equipment than what was approved under the suspended permit.

Table 1 – Existing Pads, Equipment and Structures to Remain

Site Plan ID	Description	Size in Sq. Ft.
A	Receiving Bays (4)	2,400
B	Trash/Grit Removal Unit	681
CL1-5	Clarifier Units (5)	1,600
D1	Centrifuge Unit	31
D2	Centrifuge Unit	31
D3	Centrifuge Unit	31
K	Maintenance Shed	320
N1	Sea Container (records storage)	320
N2	Sea Container (parts storage)	320
N3	Sea Container (parts storage)	320
AA	3 – Concrete pads	8,575
1	10 – 20,000-gallon waste receiving tanks	3,360
2	10 – 20,000-gallon process tanks	3,360
3	5 – 20,000-gallon process tanks	1,680
5	14 – 20,000-gallon process tanks	4,704
14	Shipping Pit	231
18	Diesel Fuel Tank (w/secondary containment)	126
20	Stockpile storage and recycle area (Mix Areas 1 & 2)	8,800
22	One VCAPCD Control Device	n/a

² These activities are considered “construction” in the impact analysis. All other activities referenced in this impact analysis are considered “operational” activities.

Table 2 – Proposed Pads, Equipment and Structures

Site Plan ID	Description	Size in Sq. Ft.
D	Mixing Tanks (6+)	828
E	Electro-Coagulation Unit or other Metal Removal Unit	145
F1	Ozone Unit	237
G	Gas Energy Mixing (GEM) Unit	1,270
H	Modular Office	1,056
J	Modular Laboratory	648
L	Modular Employee Changing Room/Break Room	864
BB	2 – Shaker Units (screens)	252
HH	Skim Tanks (2)	226
4	10 – 20,000-gallon waste receiving tanks	2,944
12	Sand Filters (6 to 8)	300
13	Portable Water Tanks	128
16	Carbon Filters	237
17	Filter Units (organo-clay)	237
19	pH Adjustment Tank	226
21	Two reverse osmosis units (previously approved under Major Modification LU06-0011, but never installed)	15 each
23	Concrete pad (4,850 sq. ft. in area)	4,850
25	Hazardous Materials Storage Building	610
26	Oil/water separator	119

As identified in Table 2, above, in addition to the removal and/or replacement of various equipment, the modified CUP would also include the authorization to install four new buildings on the site (Attachments 11 and 12 of the Initial Study):

New 1,056 sq. ft. Office (labeled as “H” on the site plan and in Table 2, above): The 1,056 sq. ft. (24 feet x 44 feet) modular office will be used at the facility by personnel for administrative functions relating to the facility operations, which includes but not limited to scheduling waste shipments and maintaining shipping manifests. The office will include a restroom.

New 648 sq. ft. Laboratory (labeled as “J” on the site plan and in Table 2, above): The 648 sq. ft. (54 feet x 12 feet) modular laboratory will contain the laboratory analytical equipment and include space for lab technicians needed to test incoming waste loads to be sure they are the same as the waste streams profiled and do not exceed hazardous waste criteria. The laboratory will be used to conduct bench scale treatability testing to be sure the facility treatment processes can reduce the waste stream contaminants to levels below the facility’s discharge limits. The laboratory will be equipped with laboratory sinks and an emergency shower/eyewash station. The laboratory will also include a restroom. Discharges to the septic system connected to the restroom will be limited to water from

hand wash sinks and discharges from toilets. Laboratory chemicals or wastewater received from off-site sources will not be allowed to be discharged down the sink or toilets. The chemicals or wastewater will be required to be discharged to a tank contained below or adjacent to the laboratory building or to a poly collection container located directly under the sink for subsequent disposal to an off-site disposal facility.

New 610 sq. ft. Hazardous Material Storage Building (labeled as “25” on the site plan and in Table 2, above): The 610 sq. ft. (61 feet x 10 feet) metal hazardous materials storage building will be used to store any hazardous materials (i.e., treatment chemicals) that are required for the treatment processes used to treat the incoming waste streams. The applicant proposes to store these materials and chemicals, when not in use in the treatment processes, inside this separate dedicated hazardous materials storage building. This building will be spill contained and have separate storage areas to allow for segregation of incompatible hazardous materials (e.g., store acids separately from caustics). This building will not include any plumbing or restroom facilities. For safety reasons, all other 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.

New 864 sq. ft. Employee Changing/Break Room (labeled as “L” on the site plan and in Table 2, above): The 864 sq. ft. (36 feet x 24 feet) modular changing/break room building is intended to provide employees a place to change into and out of their work clothing and boots, take breaks, and eat lunches inside a shaded and cooled structure. Additionally, this building will be used to store safety equipment, such as respirators and Tyvek suits, and will have benches, lockers, a table, and chairs. This building will not include any plumbing or restroom facilities.

There are four existing emergency showers/eye wash stations that are spaced throughout the facility so that employees will have quick and easy access, if needed. One additional emergency shower/eye wash station is proposed inside of the proposed laboratory building.

An outfall into the Cummings storm drain for a “non-brine discharge stream” was approved for installation pursuant to Major Modification LU06-0011 but was never installed. The applicant requests to remove this component from the project and will not install a separate outfall.

The applicant proposes to implement the following operational policy changes as part of the proposed project:

- The facility will no longer accept any wastewater contained in totes. The only totes allowed on the premises will contain clearly marked and labeled chemical treatment products. Additional and targeted safety training to 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, and listed potential sanctions for any violations.

- The domestic waste treatment process will no longer be conducted in the open mixing areas.
- The chemical treatment products and any other hazardous materials not being actively used in the treatment process will be stored inside a separate dedicated proposed hazardous materials storage building.
- The use of the 12-mile sewer discharge pipeline to the City of Oxnard's Waste Treatment Plant is no longer a part of this project. All waste will be trucked on and off the site.

The existing operating hours and truck delivery schedules are show in Table 3 below:

Table 3 – Existing Operating Hours and Truck Delivery Schedule

Authorized Actions	Days and Hours
Waste Processing and Treatment Operations	Monday through Saturday, 5:00 a.m. to 11:00 p.m., closed on Sunday
All Truck Deliveries to and from the Facility (including wastes, supplies, hazardous material deliveries, etc.)	Monday through Friday, 7:00 a.m. to 5:00 p.m. Saturday, 8:00 a.m. to 3:00 p.m. No Truck Deliveries or Shipping outside of these days and hours, except for emergencies ³

The modified CUP will authorize a change in facility operating hours and truck delivery schedules. The proposed project includes a 24-hour operation for the waste processing and treatment operations and an additional two hours for truck traffic on Mondays through Friday (i.e., change end time from 5:00 p.m. to 7 p.m.).

Table 4 – Proposed Operating Hours and Truck Delivery Schedule

Proposed Actions	Proposed Days and Hours
Waste Processing and Treatment Operations	24 hours/day, 365 days/year
All Truck Deliveries to and from the Facility (including wastes, supplies, hazardous material deliveries, etc.)	Monday through Friday, 7:00 a.m. to 7:00 p.m. Saturday, 8:00 a.m. to 3:00 p.m. No Truck Deliveries or Shipping outside of these days and hours, except for emergencies ⁴

³ The Planning Director would determine if the situation constitutes an emergency and whether the off-hours acceptance of materials would be authorized on a case-by-case basis.

⁴ The Planning Director would determine if the situation constitutes an emergency and whether the off-hours acceptance of materials would be authorized on a case-by-case basis.

The truck delivery schedule specified in Table 4 above shall not be exceeded, but the schedule may be altered for a period of time for emergencies through prior written authorization from the Planning Director or designee based upon good cause being shown and substantially documented by the permittee.

The modified CUP will authorize a change to the truck trip limits by removing the distinction between the delivery trips and outgoing waste trips and authorizing an overall truck trip limit. Table 5, below, summarizes the existing truck trip limits:

Table 5 – Existing Truck Trip Limit

Trip Type	Weekly Trucks
Supply Deliveries	4
Outgoing waste and recyclable product	16
Waste Deliveries	480 (80 per day, 6 days/week)
CUP Weekly Total	500
Average Trucks/Day	83.3
Average Daily Trips (ADT)	166.6

The proposed truck trip limit below in Table 6 represents no increase in weekly truck trips and establishes a maximum daily truck trip limit.

Table 6 – Proposed Truck Trip Limit

Trip Type	Weekly Trucks
All Delivery Trucks (incoming and outgoing wastes, supplies, hazardous material deliveries, etc.)	500
Average trucks/day	83.3
Average daily trips (ADT)	166.6
Daily maximum truck limit	100
Daily maximum trips (ADT)	200

Historically, wastewater conveyance treatment services agreements entered into between the City of Oxnard and the subject facility allowed up to 600,000 gallons per day of treated wastewater to be discharged by the facility into the City's sewerage system connected to the existing 12-mile pipeline. As the facility will no longer utilize the 12-mile pipeline the daily quantity of non-hazardous waste treated will be limited by the maximum allowed non-hazardous waste delivery trucks and the sizes of the delivery trucks. Also, the applicant proposes to utilize a number of the incoming waste delivery trucks to back-haul treated waste back to off-site disposal facilities. Table 6 provides an example assuming:

- An approximate split between different incoming waste streams.
- A total of 80 trucks per day delivering and back-hauling wastes.

- 50% of the incoming waste trucks back-haul treated waste to an off-site disposal facility.

Table 7 – Daily Treated Waste with 50% Back-Haul (Assumes No Pipeline)

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							
		% of		DAILY					SUBTRACT
	INCOMING	WASTE	# of	INCOMING	OUTGOING	DAILY	# of TRUCKS	% BACK	BACK HAUL
WASTE STREAM	TRUCK SIZE	VOLUME	TRUCKS IN	VOLUME	TRUCK SIZE	OUTGOING	OUT PER	HAUL	TRUCKS PER
	(gal)		PER DAY	(gal)	(gal)	VOLUME (gal)	DAY	TRUCKS	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						

Based on this analysis, the facility would be able to accept and treat 208,000 gallons per day of non-hazardous waste. Depending on the incoming waste stream mix that number could vary significantly. Regardless, the number of allowable trucks will limit the quantity of non-hazardous waste treated by the facility. The modified CUP restricts the number of waste delivery trucks to the facility on a daily and weekly basis, as listed in Table 5, but does not place restrictions on the daily amount of waste treated. The facility includes over 1,000,000 gallons of tank storage capacity onsite at any one time.

To minimize potential issues associated with on-site truck traffic, the applicant proposes an on-site traffic queuing plan (Attachment 13 of the Initial Study). Safety concepts and measures from the plan include:

- 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 onsite;
- Use of incoming industrial waste trucks for backhauling of treated industrial waste to reduce the total truck activity;
- 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 onsite;
- Installation of informational signage on-site to guide traffic patterns and identify loading infrastructure and procedures;

- Schedule of incoming waste deliveries to prevent excess trucks onsite and queuing on Mission Rock Road. Trucks will be required to arrive at the facility at their scheduled appointment times. Trucks that arrive prior to truck delivery hours (prior to 7:00 a.m., Monday through Friday; and prior to 8:00 a.m. on 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 generator 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;
- Scheduled incoming hazardous materials deliveries will occur during truck delivery hours, however, all other 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.

Table 8 below specifies the typical sizes of each of the waste hauling trucks to be used at the proposed facility:

Table 8 – Typical Waste Hauling Truck Sizes

Type of Trucks	Typical Size
Industrial and Oilfield Waste Trucks	
Liquid Industrial Waste Vacuum Truck	5,000-gallon
Incoming Solid Industrial Waste Roll Off Truck	20-40 cubic yards
Outgoing Solid Industrial Waste Dump Truck	25-ton
Domestic Waste Trucks	
Incoming Liquid Domestic Waste Vacuum Truck	1,200 to 2,000-gallon
Outgoing Liquid Domestic Waste Vacuum Truck	6,000-gallon

The modified CUP will authorize a change to the number of employees at the facility. The existing permit authorizes 15 employees. The applicant proposes an additional 25 employees (increase from 15 to 40 employees). This will result in two work shifts with 15 employees at the facility (mornings and afternoons) and one work shift with 10 employees at the facility (graveyard shift when no incoming waste trucking occurs). The additional employees will serve expanded operating hours and ensure compliance with local, state, and federal regulations on a 24-hour period.

The modified CUP will authorize the installation of 26,862 sq. ft. (9.8 percent of the CUP area) of landscaping, which will include 128 new trees and 183 new shrubs and low-growing plants as illustrated on the applicant's conceptual Landscape and Planting Plan (Attachment 14 of the Initial Study). Landscaping will be located within the new parking lot area, adjacent to the proposed office building, and along the perimeter of the project

site. There will be no internal landscaping near any processing equipment. All proposed landscaping will be installed prior to the issuance of a Zoning Clearance for Use Inauguration, i.e., prior to renewed operation of the facility.

The modified CUP will authorize a total of three driveways to the facility. The driveways along Mission Rock Road and Shell Road will help facilitate the safe and orderly movement of haul trucks throughout the facility.

A total of 27 parking spaces will be provided at the facility to be used by employees and visitors, including one ADA accessible parking space.

The modified CUP will authorize a total of 23 exterior light fixtures: 20, 25-ft. tall pole-mounted lamps throughout the facility, and 3, 25-ft. mounted lights attached to the exterior of the proposed laboratory. All proposed lighting will be shielded, cut-off fixtures as shown on the applicant's proposed Lighting Plan (Attachment 15 of the Initial Study).

A proposed Sign Plan and Summary (Attachment 16 of the Initial Study) prepared by the applicant's representative, Sespe Consulting, Inc., shows a freestanding identification sign measuring three feet tall by eight feet wide (24 sq. ft. sign area) and extending five feet and five inches above grade, located 15-feet from the street-side property line. The proposed sign plan also includes all interior signage that cannot be viewed from the public roadway, such as employee safety protocol and directional signage.

Within the CUP boundaries there are two existing, inactive oil wells which are not part of the proposed project: SPS 29, which is abandoned and plugged; and, SPS 17, which is an active water supply well currently owned by California Resources Corporation. The proposed project's components will not interfere with the accessibility requirements for either well.

Water service will continue to be provided by the City of Santa Paula by means of an existing 1.5-inch meter (Meter #11314216). A septic system is proposed to be installed for on-site sewage disposal for the facility.