Initial Study for Case No. PL15-0106
RI-NU Wastewater Treatment Facility

County of Ventura • Resource Management Agency
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • www.vcrma.org/divisions/planning

Section A – Project Description

1. **Project Case Number:** PL15-0106

2. **Name of Applicant/Proposed Facility Operator:** RI-NU Services, LLC (RI-NU), Timothy J. Koziol, Manager

3. **Name of Property Owner:** Santa Clara Waste Water Company (SCWW)

4. **Project Location and Assessor's Parcel Number (APN)(Attachment 1):** 815 Mission Rock Road, Santa Paula; APN 099-0-060-565

5. **General Plan Land Use Designation and Zoning Designation of the Project Site (Attachment 2):**

   a. **General Plan Land Use Designation:** Industrial

   b. **Zoning Designation:** "M-3, 10,000 sq. ft." (General Industrial, 10,000 sq. ft. minimum lot size)

6. **Description of the Environmental Setting:** The subject property is located within the approximately 95-acre Mission Rock Road (MRR) community, an industrially-zoned area located within the Santa Paula Area of Interest, approximately 0.3 miles south of State Route (SR) 126, 0.4 miles north of the Santa Clara River, and 2.0 miles west of the city limits of Santa Paula, in unincorporated Ventura County. The MRR community is one of three areas in unincorporated Ventura County with a General Industrial zone designation (M-3) that allows for the development of a broad range of general manufacturing, processing and fabrication activities, including wastewater treatment facilities. The other two industrially-zoned areas in unincorporated Ventura County are located in the communities of Saticoy and North Ventura Avenue.

   Industrial uses have been established in the MRR community over the past 60+ years on land that was previously used for agriculture, primarily pasture use. Oil well development in this area began in the mid-1950s, with the first producing oil well completed in 1955. In that same time period, excavation of sand and gravel in the Santa Clara riverbed commenced, and in 1959, an asphalt batch plant and an oilfield wastewater treatment facility (the subject project) were approved in the area. Subsequently, more industrial uses were permitted in the area in the 1960s. Currently the following types of uses are located within the MRR community: a wastewater treatment facility, auto salvage and wrecking yards, oilfield leases, truck transportation services, heavy machinery repair services, contractor service

and storage yards, a concrete and asphalt batch plant, a dog kennel, a recreational vehicle storage yard, and caretaker units.

The subject parcel is 6.97 acres (303,613.20 sq. ft.) in area and the project site is 6.31 acres (274,863.60 sq. ft.) in area. It is bordered on the north by agricultural crop production. Immediately to the east of the project site is Mission Rock Road, a paved 30-foot private road easement, and beyond the road easement are additional industrial uses. Directly beyond the northwestern border of the project site is an approximately 95 feet wide undeveloped area of land. Beyond this area is the Cummings Road Drain and west of the Cummings Road Drain is agricultural crop production. A two-story residence, constructed in 2009, is located just west of the Cummings Road Drain and within 40 feet of the southwestern corner of the project site on APN 099-0-050-115.

There is currently no existing landscaping within the project site and the ground has been either paved or previously disturbed. There are two existing, inactive oil wells located on the project site: "S.P.S." 17 and "S.P.S." 29 that are not part of the proposed project. "S.P.S" 17 is no longer used as an oil well and was converted to a water source well in 2013. "S.P.S." 29 is a plugged and abandoned oil well.

The project site currently includes several empty baker tanks, cargo containers, and decommissioned wastewater treatment equipment. The wastewater treatment facility has not been in operation since November 2014.

7. Permit, Violation, and Environmental Document History: On July 21, 1959, the Board of Supervisors granted Special Use Permit (SUP) 960 to Shell Oil Company to authorize the construction of sumps to receive oilfield salt water waste to be disposed by pipeline to the City of Oxnard's sewer system.

Since the original approval of SUP 960, the following County permitting actions have occurred, which are outlined below in chronological order:

- On September 21, 1959, the Board of Supervisors granted a modification of SUP 960 to authorize a revision to Condition No. 3 of the conditions of approval to permit one-foot freeboard in place of the three-feet of freeboard within the oilfield waste disposal area.

- On December 31, 1959, SCWW acquired the interest of Shell Oil Company in the wastewater disposal facility. On January 12, 1960, the Planning Division acknowledged the transfer of SUP 960 to SCWW. On February 9, 1960, the Board of Supervisors approved the transfer of SUP 960 to SCWW.

- In 1987, the Planning Division conducted a comprehensive inspection of the industrial uses operating in the entire MRR community, including the wastewater treatment facility, to determine compliance with the land use permit conditions set forth in each of the various operators' permits. During this inspection, the Planning Division found that there was inadequate fire protection provided at the SCWW facility. During this time, all SUPs were re-classified as Conditional Use Permits (CUP). From this point forward, SUP 960 is referred to as CUP 960.

- On June 28, 1989, VenVirotek, Inc. acquired 100 percent of the stock in SCWW. On September 21, 1989, the Planning Director granted a permit adjustment to CUP 960 to authorize the replacement of piping, the replacement of oil storage tanks, the addition of a three-stage clarifier, the relocation of the existing skid mounted laboratory building, the replacement of the truck pit and entry box with a four bay truck off-loading ramp and truck washout ramp, the removal of the existing skim pit, truck pit and entry box, and the installation of an oil and chip coated drive lane for dust minimization. This project was determined to be categorically exempt from environmental review pursuant to the State Guidelines to the California Environmental Quality Act (CEQA) section 15301, Class 1, since the project involved minor alterations of the existing facility.

- On August 30, 1990, a modification of CUP 960 (Case No. CUP 960-2) was granted by the Planning Commission to authorize the continued operation of the oilfield wastewater treatment facility for a 50-year operation period (ending on August 30, 2040) and the addition of modern uniform conditions of approval to require the wastewater treatment facility to operate in compliance with current state and local regulations. The Planning Commission also adopted a Mitigated Negative Declaration (MND), and mitigation measures were made conditions of approval of the project. The MND identified the following potentially significant impact areas which were reduced to levels of less-than-significant through the adopted mitigation measures: fire protection, flooding, and traffic circulation.

- On November 28, 1990, the Planning Director granted a permit adjustment to CUP 960 to authorize minor site plan adjustments and the construction of an air stripper structure approximately 32 feet tall as required by the City of Oxnard in order to reduce total toxic organics to comply with permits for ocean discharge to the City's Wastewater Treatment Plant. This project was determined to be categorically exempt from environmental review pursuant to CEQA Guidelines section 15301, Class 1, since it involved minor alterations to an existing facility.

- On July 24, 1991, the Planning Division issued a Notice of Violation (Case No. ZV87-0027) for the installation of a mobile home and an office trailer on the property without the required permits. On August 9, 1991, SCWW indicated to the Planning Division that the unpermitted structures would be removed from the property and relocated to the SCWW's facility in Kern County.

- A Wastewater Conveyance and Treatment Services Agreement was entered into between the City of Oxnard and SCWW on November 5, 1991, that authorized the City of Oxnard to accept and treat 600,000 gallons or less per day of wastewater discharged by SCWW into the City's sewerage system via an existing 12-mile pipeline. The term of this agreement was for three years. From 1994 until 2014, SCWW received yearly approval from the City to continue to use the City's sewerage system for wastewater discharge in accordance with the applicable Industrial Wastewater Discharge Permit issued to SCWW.

- On November 12, 1991, the Planning Director granted a permit adjustment of CUP 960 to authorize a revision to the language of Condition No. A-1(a) of the conditions of approval of CUP 960 to allow the treatment of other types of wastewater (i.e., food processing water, softener regeneration waste, and industrial wastewater) along with oilfield brine wastewater. This permit adjustment did not authorize the treatment of more contaminated wastewater, but rather allowed for more flexibility in wastewater treatment. This project was determined to be categorically exempt from environmental review pursuant to CEQA Guidelines section 15301, Class 1, since it involved minor alterations to the existing facility.

- Between December 1991 and September 1993, the Planning Director granted eight permit adjustments of CUP 960, which were originally granted on August 30, 1990, to allow time extensions in order to satisfy all of the "prior to" Zoning Clearance conditions and receive a final Zoning Clearance for Use Inauguration of CUP 960. These permit adjustments were all determined to be categorically exempt from environmental review pursuant to CEQA Guidelines section 15301, Class 1. On October 12, 1993, the final Zoning Clearance for Use Inauguration of the 1990 modification of CUP 960 (Case No. CUP 960-2) was issued.

- On April 25, 1994, the Planning Director granted a permit adjustment to CUP 960 to authorize an additional process to the existing wastewater treatment facility, which allowed the receipt and treatment of non-hazardous rinsate waters from crude oil storage tank washouts (and tank bottoms) within Ventura County. The waste streams were determined to be similar to

the ones already approved to be received by SCWW, since the wastes' origins were the same and the sediments and floating oil were nearly identical to the treatment of non-hazardous oilfield and brine wastewater.

- On August 8, 1996, SCWW was notified by the Planning Division that the production of cold mix asphalt on the property was not an allowed process pursuant to the conditions of approval of CUP 960. SCWW was also advised that a modification application would be required to be submitted for review and approval by the County for the authorization of this proposed new use.

- On August 20, 1998, the Planning Division issued a Notice of Violation (Violation Case No. ZV87-0027) to SCWW for the storage/stockpiling of solids for future asphalt recycling and cold mix asphalt operations and the addition of new equipment without required permits. On October 29, 1998, a Compliance Agreement (CA-7027) was entered into to allow SCWW to systematically abate the violations listed in the Notice of Violation. The Compliance Agreement required, in part, that SCWW file an application requesting modification of CUP 960 to legalize (validate) the unpermitted expansion and addition of structures at the facility.

- In accordance with the terms and conditions of the Compliance Agreement, on September 28, 1998, a Zoning Clearance (ZC78721) was issued to SCWW to authorize production and installation of cold-mix asphalt to use onsite in re-surfacing and asphalt repair. On October 22, 1998, the Planning Division issued a second Zoning Clearance (ZC78817) to authorize cold mix asphalt processing for installation of a parking area on the property.

- On December 19, 2002, the Planning Division issued an updated Notice of Violation (Violation Case No. ZV87-0027) to SCWW for the construction of several structures and the construction of two treatment ponds without required permits. On December 23, 2002, a Notice of Noncompliance was recorded against the property for the unresolved violations.

- On February 2, 2006, SCWW submitted an application to modify CUP 960 (Major Modification Case No. LU06-0011) to authorize an upgrade to the existing wastewater treatment facility and legalize (validate) the existing unpermitted structures and equipment to abate all of the unresolved violations as listed in the Notice of Violation (Zoning Violation No. ZV87-0027).

- On May 8, 2006, the Planning Director granted a permit adjustment of CUP 960 (Case No. LU06-0013) to authorize the relocation of the entry gate from

Shell Road to Mission Rock Road and the relocation and replacement of the existing office trailer from the west side to the east side of the property. This project was determined to be categorically exempt from environmental review pursuant to CEQA Guidelines section 15305, Minor Alterations in Land Use Limitations.

- The processing of Major Modification LU06-0011 was delayed from December 2008 until January 2010 due to the applicant's request to modify the project description of the application. A modified project description was submitted to the Planning Division on January 14, 2010. Subsequently, on July 29, 2010, the County granted the modification of CUP 960 to authorize an upgrade to the existing wastewater treatment facility and legalize (validate) the existing-unpermitted structures and equipment to abate all of the unresolved violations as listed in the Notice of Violation (Zoning Violation No. ZV87-0027). In addition to the approval of the project, the Planning Commission adopted a Negative Declaration (ND) pursuant to the CEQA Guidelines. Major Modification LU06-0011 includes the most current operating conditions of approval for the facility.

- On October 17, 2011, the Code Compliance Division issued a new Notice of Violation and Notice of Impending Civil Administrative Penalties (Violation Case No. CV11-0403) to SCWW for the installation of a double-wide mobile home and an office trailer connected to utilities without required permits.

- On September 11, 2012, SCWW submitted an application to modify CUP 960 (Case No. PL12-0130) to authorize the expansion of the facility by 2.5 acres, a re-design of the layout of the facility, the addition of a soil treatment system for treatment of solids removed during waste processing in order to be re-used instead of disposed into landfills, and the legalization (validation) of unpermitted structures to abate Violation Case No. CV11-0403. SCWW obtained a demolition permit (B13-000652) to remove the unpermitted structures in order to abate the violation. Violation Case No. CV11-0403 was closed on October 10, 2013. The modification application (PL12-0130) was deemed incomplete on November 12, 2012 and was subsequently terminated by the Planning Director on June 4, 2015, because it remained incomplete for more than 180 days.

- On July 17, 2014, the Planning Division issued a Zoning Clearance for Use Inauguration (ZC14-0752) of Major Modification LU06-0011. The conditions of approval of Modification LU06-0011 supersede all previously approved conditions of approval of CUP 960. Thus, the conditions established by Major Modification LU06-0011 are the current operating conditions for the

existing wastewater treatment facility under CUP 960. The violations cited in Violation Case No. ZV87-0027 were abated and the violation case was closed upon issuance of the Zoning Clearance for Use Inauguration of Major Modification LU06-0011.

- Approximately 4 months after the issuance of the Zoning Clearance for Use Inauguration of Major Modification LU06-0011, on November 18, 2014, a chemical explosion and fire occurred at the SCWW facility. The record shows that the explosion was caused by the mixing of a hazardous chemical with incompatible materials in a vacuum truck. The November 2014 incident resulted in the destruction of a portion of the project site as well as many of the project site's facilities. According to the City of Santa Paula, several City of Santa Paula emergency response personnel suffered respiratory injuries from inhalation hazards generated by the incident, which resulted in medical retirements.[1] Injuries were sustained by an on-site worker as well. In addition, the explosion and fire caused damage to nearby off-site agricultural crop production operations and industrial buildings, and the destruction of one City of Santa Paula fire truck.

  At the request of SCWW, a report of the fire and explosion was prepared by Michael D. Bradbury of the Law Offices of Michael D. Bradbury on February 27, 2015, that included recommended policy changes SCWW would implement in order to prevent such incidents from occurring in the future. (Attachment 3). The recommended policy changes include: (1) the facility will no longer accept any wastewater contained in totes, and the only totes allowed to be present on the premises will contain clearly marked and labeled chemical treatment products; and, (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 processed as wastewater, along with posted detailed protocols and reminders, and listed potential sanctions for any violations.

  After the November 2014 fire and explosion on the project site, the Planning Division suspended the land use entitlement (CUP 960) to operate the wastewater treatment facility. On November 24, 2014, the City of Oxnard indefinitely suspended the Industrial Wastewater Discharge Permit that had allowed non-hazardous waste to be discharged from the facility to the City of Oxnard's Wastewater Treatment Plant via a 12-mile sewer pipeline. To date, the Industrial Wastewater Discharge Permit for the facility has not been reinstated or renewed by the City.

[1] Letter dated February 21, 2017, from Janna Minsk, AICP, Planning Director of the City of Santa Paula to Franca Rosengren, Case Planner, County of Ventura Planning Division.

- On April 20, 2015, the Planning Director authorized the issuance of an Emergency Use Authorization (EUA) Permit to allow specific clean-up activities as a result of the fire and explosion. Due to the severity of the incident, numerous local, state, and federal agencies (Ventura County Environmental Health Division (EHD), Planning Division, Environmental Protection Agency (EPA), Ventura County Fire Protection District (VCFPD), and the U.S. Coast Guard Pacific Strike Team) were involved with the clean-up and remediation of the site.

  Since the 2014 incident, no wastewater treatment uses on the site have occurred, i.e., no incoming or exporting of waste, or processing of waste. Only clean-up activities authorized under the EUA have occurred and were deemed to have been successfully completed on December 29, 2017. SCWW submitted a Final EUA Report to the Planning Division and EHD on January 30, 2018. (Attachment 4).

- On July 10, 2015, with the intent to re-open the facility, SCWW submitted an application to reinstate and modify CUP 960 (Case No. PL15-0106). The proposed project includes clarifying the project description regarding the waste streams that can be accepted by the facility and their treatment methods, revising the list of facility equipment, revising the facility operating hours, revising the daily truck traffic limits, proposing operational safety changes, and revising the number of employees.

- During the processing of Case No. PL15-0106, Planning Division staff identified violations at the SCWW facility. On August 10, 2015, a Notice of Violation (Violation Case No. PV15-0020) (Attachment 5) was issued to SCWW for the following violations: (1) expansion of the SCWW facility beyond the approved CUP boundaries set forth in Major Modification LU06-0011; (2) failure to install the required landscaping on the property pursuant to the conditions of approval as established by Major Modification LU06-0011; and, (3) erection of freestanding signage without the required permits. On March 29, 2017, a Notice of Noncompliance (Attachment 6) was recorded against the property. The applicant proposes to address and abate these violations by incorporating them into the project description for the reinstatement and modification of CUP 960 (Case No. PL15-0106).

- On March 26, 2016, the applicant changed from SCWW to Patriot Environmental Services, with the latter advising the Planning Division that it was in the process of acquiring the assets of SCWW, which is contingent upon the successful reinstatement of the CUP, issuance of a new Waste Discharge Permit from the City of Oxnard, and the reopening of the facility.

- On November 7, 2017, Patriot Environmental Services advised the Planning Division that its purchase agreement with SCWW had been terminated and, therefore, that it was no longer the applicant of the subject application. Upon notification of this information, SCWW advised the Planning Division that it was again the sole project applicant.

- On February 28, 2018, the applicant changed from SCWW to RI-NU (the current project applicant).[2] RI-NU advised the Planning Division that it intends to operate the facility and ultimately purchase it from SCWW if the reinstatement and modification of CUP 960 is approved.

- At the request of the Planning Division, in October 2018, the applicant hired Ensafe, Inc.,[3] to conduct a Risk Management Analysis (RMA) of the applicant's proposed wastewater treatment facility (Attachment 7). The RMA was facilitated by Ensafe staff and the applicant's representative (Sespe Consulting, Inc.). As part of the RMA, a joint site inspection of the facility was conducted and attended by Ensafe staff, Sespe Consulting staff, Planning Division staff, and prior SCWW staff on November 28, 2018. The RMA was conducted utilizing the process hazard analysis (PHA) methodology[4] and included a review of the proposed wastewater treatment processes and ancillary processes, including unloading, loading, storage, and on-site/off-site chemical transport at the facility.

- On January 5, 2019, RI-NU submitted a revised application that included a revised domestic waste treatment process, a revised conceptual landscape plan, and the RMA Report prepared by Ensafe, Inc., that identified nine recommendations for consideration to reduce risk and adequately control potential on-site hazards at the facility (see Attachment 7).

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[2] In this Initial Study, the Planning Division refers to SCWW as the name of the facility and RI-NU as the proposed facility operator and applicant.

[3] Ensafe Inc. is a global professional services and management firm specializing in environmental, engineering, health and safety, and technology solutions.

[4] A Process Hazard Analysis (PHA) Methodology is a set of organized and systematic assessments of the potential hazards associated with an industrial process. A PHA is directed toward analyzing potential causes and consequences of fires, explosions, releases of toxic or flammable chemicals and major spills of hazardous chemicals, and it focuses on equipment, instrumentation, utilities, human actions, and external factors that might impact the process.

- On August 29, 2019, at the applicant's request, the processing of the reinstatement and modification of CUP 960 application (PL15-0106) was temporarily suspended in order to allow the applicant additional time to redesign the project to address specific issues (one of which concerned the use of the 12-mile sewer discharge pipeline) raised by the City of Oxnard and the City of Santa Paula during the public comment period for the proposed environmental document for PL15-0106.

- On October 28, 2020, the applicant submitted a revised application that included the following substantial revisions in order to address the environmental concerns raised during the public comment period: removal of the use of the 12-mile sewer discharge pipeline, propose to solely trucking wastewater offsite, and propose to install a septic system connected to the proposed restrooms at the facility. This application (PL15-0106) was deemed complete on May 28, 2021 and is the subject of this Initial Study.

8. Baseline Setting and Conditions: The baseline setting and conditions for purposes of this Initial Study include:

- The facility's physical condition, including the facility's most recent operation of accepting, treating, and disposing of various types of non-hazardous waste streams, and supporting ancillary activities, pursuant to the conditions of approval of Major Modification LU06-0011, which is temporarily suspended, but remains in effect.

- No on-site (e.g., septic system) or off-site (e.g., connection to public sewer) individual sewage disposal system. In 2013, the on-site septic system was abandoned and porta-potties for its employees were provided as a means of sewage disposal.

- Historic water use records from 2011 to 2013[5] indicate an average of 56.6 acre-feet-year (AFY) at the facility supplied by the City of Santa Paula.

- The estimated baseline of delivery trucks is 61.8 trucks per day (i.e., 123.6 ADT[6] trips) and 12 employee vehicles per day (i.e., 24 ADT trips) as outlined

[5] 2013 is the last year in which the facility was operating at the same volume that the applicant requests to operate as part of the proposed project.

[6] ADT is defined in the Ventura County Initial Study Assessment Guidelines as the total bi-directional (which counts each trip, entering and exiting, of a two-way round trip)

in Attachment 8. The baseline of total trucks to the facility is derived from data contained in copies of the former operator's manifest records and waste volume records from the year 2014 (the last operational year of the facility).

- The existing CUP authorized a total of 15 employees, but the information available indicates that the facility operated with a total of 12 employees.

- Established and Permitted Hours of Operation:
  - Waste Processing and Treatment Operations: Monday – Saturday, 5:00 a.m. to 11:00 p.m.
  - Truck Deliveries: Monday – Friday, 7:00 a.m. to 5:00 p.m., and Saturday, 8:00 a.m. to 3:00 p.m.
  - Facility closed on Sunday.

9. Entitlements – County Process and Procedure: The current application to authorize the reinstatement and expansion of the facility's previous operations and abatement of confirmed violations is being processed as a request for a Major Modification of CUP 960 (as previously modified by LU06-0011) pursuant to Ventura County Non-Coastal Zoning Ordinance (NCZO) section 8111-1.2.1(d). As part of processing this request, the County is evaluating the potential environmental impacts associated with the construction and operation of the proposed modified facility in accordance with CEQA Guidelines section 15063. Additional information regarding the handling and treatment of waste streams, on-site hazardous chemical storage, and waste disposal trucked offsite are included in this Initial Study. As part of the discretionary review process for the proposed modified CUP, the Planning Division will prepare a detailed discussion of the project's conformance with County General Plan goals, policies and programs, zoning regulations and development standards, including those related to addressing public health and safety issues, in a Planning Commission staff report.

10. Regulatory Framework:

a. County of Ventura General Plan and Zoning Ordinance
Community wastewater treatment facilities must conform to the goals, policies, and programs of the Ventura County General Plan. The NCZO includes regulations governing waste handling and waste disposal facilities in Ventura County. As mentioned above in Section A.9, the project's conformance with County General Plan goals, policies and programs, and zoning regulations and development standards, including those related to addressing public health and

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volume of traffic passing through a given point during a given time period, divided by the number of days in that time period.

safety issues, will be addressed in a subsequent staff report that will include Planning Division staff's and the Planning Commission's recommendation for the Board of Supervisors' consideration of the CUP modification.

Pursuant to the NCZO section 8105-5, a Board of Supervisors-approved CUP is required for an off-site wastewater treatment facility, referred to as a Community Wastewater Treatment Facility (Attachment 9).[7] Because the proposed project is considered a substantial change (i.e., removing sewer connection and solely trucking offsite) and would alter the findings contained in the previous environmental document adopted for the underlying land use entitlement (CUP-960, as modified by Major Modification LU06-0011), the proposed project is considered a major modification of CUP-960. For this reason, the proposed project shall be acted upon by the decision-maker who approved the original permit, who was the Board of Supervisors. Prior to the Board of Supervisors hearing on this project, the application shall first be reviewed by the Planning Commission in accordance with NCZO section 8111-1.2.1.b.

b. County of Ventura Environmental Health Division – Certified Unified Program Agency

The Ventura County Certified Unified Program Agency (CUPA), through its Hazardous Materials Program, provides regulatory oversight for statewide environmental programs including: (1) Hazardous Materials Business Plan (HMBP); (2) Hazardous Waste Handling; (3) Tiered Permitting; (4) Underground Storage Tanks; (5) Aboveground Petroleum Storage; and, (6) California Accidental Release Prevention Program. Ventura County CUPA implements state and federal laws and regulations, County ordinance code requirements, and local policies for the above programs. Ventura County CUPA will oversee the proposed wastewater treatment facility's operations to verify compliance with all federal, state and local regulations pertaining to the storage and handling of hazardous materials.

c. California Department of Toxic Control, Environmental Protection Agency

The proposed wastewater treatment facility includes activities that will infrequently "generate" hazardous waste. A "Generator" is any person, by site, whose act or process produces hazardous waste identified in Chapter 11 of the

[7] The NCZO defines "Community Wastewater Treatment Facility" as a facility that "treats liquid waste which is received from off of the plant site. Such facilities include public agency-owned plants and privately-owned plants […]." The Planning Director has determined that the existing wastewater treatment facility is equivalent to a "Community Wastewater Treatment Facility" pursuant to a Planning Director Equivalency Determination (Attachment 8).

state's hazardous waste regulations or whose act first causes a hazardous waste to become subject to regulation. Generators are responsible for properly characterizing or identifying all their hazardous wastes. The steps set forth to make such a determination are found in section 66262.11 of the California Code of Regulations. Once a generator determines its waste meets the definition of a hazardous waste, the requirements that apply to the waste depends on the amount or volume generated.

d. Ventura County Local Agency Formation Commission (LAFCo)
LAFCo is a responsible agency for this project. Pursuant to Government Code section 56133(a), LAFCo approval is required in order for a city or district to provide new or extended services outside its jurisdictional boundaries. Disposal of wastewater at any public facility would require LAFCo approval for an Out of Agency Service Agreement. The LAFCo process occurs after the proposed CUP modification has been granted by the local decision-making authority and would be required prior to the issuance of a Zoning Clearance for Construction of the modified facility.

Table A below lists the federal, state, and local agencies which have regulatory oversight of the wastewater treatment facility. The table includes the name of the regulatory agency, the previous operator's permit number, the description of the permit, and the status of the previous operator's permit. The proposed facility operator (i.e., applicant) will be required to obtain permits from each applicable agency either prior to construction (i.e., prior to the issuance of a Zoning Clearance for Construction) or renewed operation (i.e., prior to the issuance of a Zoning Clearance for Use Inauguration) of the wastewater treatment facility.

Table A – Federal, State, and Local Regulatory Agencies

Agency	Permit No.	Description of Permit	Status of Permit
County of Ventura Planning Division (Land Use Authority)	CUP 960	Authorization to operate a non-hazardous wastewater treatment facility until 8/30/2040	Suspended[8]
State Water Resources Control	WDID #4 56I001962	National Pollutant Discharge Elimination	Terminated[9]

[8] CUP 960 and subsequent approved modifications are suspended until the proposed reinstatement, and related modification (Case No. PL15-0106), of the permit are approved and all of the "prior to Zoning Clearance for Construction and Use Inauguration" conditions for the permit modification have been satisfied.

[9] SCWW filed a Notice of Termination (NOT) with the State Regional Water Quality Control Board relieving SCWW of coverage under NPDES General Permit (CAS000001), Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with

Board/Ventura County Watershed Protection District (Statewide General Discharge Requirements)		System (NPDES) General Permit (CAS000001)	
State Water Resources Control Board/Ventura County Watershed Protection District	N/A	Surface Water and Stormwater Runoff Maintenance Plan for Post-Construction Activities	No Approved Plan[10]
State Department of Toxic Substance Control (DTSC)	EPA ID No. CAD088381116	Transporter and Generator of Hazardous Waste	Inactive[11]
Ventura County Local Agency Formation Commission (LAFCo)	N/A	LAFCO-approved Out of Agency Service Agreement (OASA)	No Approved OASA[12]
Ventura County Air Pollution Control District (APCD)	Permit to Operate (PTO) No. 00171	PTO for Processing Systems	Canceled[13]

Industrial Activities. SCWW will be required to provide proof of acceptance of the NOT, and the new operator (i.e., RI-NU or any successor operator) will be required to show proof of coverage under NPDES Individual Permit prior to renewed operation of the facility.

[10] This requirement would be a condition of approval of the subject modification that would be implemented by the operator of the wastewater treatment facility prior to the issuance of a Zoning Clearance for Construction of the facility.

[11] The new operator may be required to apply for and receive a new EPA ID No. (or renew the currently inactive one) prior to renewed operations on the property.

[12] The new operator will be required as a condition of approval of the subject modification to obtain a LAFCo-approved OASA for off-site trucking of wastewater to any public facility prior to the issuance of a Zoning Clearance for Construction of the facility.

[13] SCWW canceled the APCD PTO since the facility is no longer in operation. Prior to construction and renewed operation of the facility, the new operator will be required to obtain all required APCD permits.

Ventura County Fire Protection District (VCFPD)	FCP 16-00016	Fire Code Permit	Canceled[14]
Ventura County Environmental Health Division – CUPA	CUPA No. FA0004974 and CA Environmental Reporting System (CERS) No. 10331929	Hazardous Waste Program and Hazardous Materials Business Plan	Inactive[15]

11. Project Description: The applicant requests the reinstatement of, and modification to, CUP 960 (as previously modified by LU06-0011) 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.[16]

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 onsite 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.

[14] Upon completion of the required clean-up activities authorized by the EUA Permit, the applicant requested that the VCFPD cancel the Fire Code Permit FCP16-00016 because of the suspension in operation at the facility. The Fire Code Permit was subsequently canceled on January 18, 2018. Prior to renewed operation of the facility, the applicant will be required to obtain new applicable Fire Code Permits for the proposed buildings, any hazardous materials use, handling and storage, as well as for emergency generators with day tanks greater than 60 gallons.

[15] At this time, the facility does not have any reportable amounts of hazardous materials or wastes onsite. If and when they have reportable amounts of hazardous materials or wastes, the operator will be required to submit a current Hazardous Materials Business Plan with the EHD and report their amounts through CERS.

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

Non-Hazardous Waste Streams Accepted
The following domestic and industrial non-hazardous waste streams are proposed to continue 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:
  - 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.

Waste streams process flow diagrams are included as Attachment 10.

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), 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.[17]

- 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). 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

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

Site Plan ID	Description	Size in Sq. Ft.
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

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):

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[18]

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

Authorized Actions	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[19]

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)

[18] 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.

[19] See Footnote 18.

Trip Type	Weekly Trucks
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							
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**						

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). 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 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). 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).

A proposed Sign Plan and Summary (Attachment 16) 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 individual on-site sewage disposal for the facility's employees.

12. List of Responsible and Trustee Agencies: The City of Santa Paula is a responsible agency for this project based on its provision of water services. LAFCo is also a responsible agency for this project. Pursuant to Government Code section 56133(a), LAFCo approval is required in order for a city or district to provide new or extended services outside its jurisdictional boundaries. Disposal of wastewater at any public facility would require LAFCo approval for an Out of Agency Service Agreement. The LAFCo process occurs after the proposed CUP modification has been granted by the local decision-making authority.

There are no trustee agencies which have jurisdiction over any natural resources affected by this project that are held in trust for the people of the State of California. The federal, state, and local agencies that have regulatory oversight of industrial wastewater treatment facilities are listed in Item 10, above.

13. Methodology for Evaluating Cumulative Impacts: Under CEQA "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In order to analyze the proposed project's contribution to cumulative environmental impacts, this Initial Study relies on the list method.

Pursuant to the CEQA Guidelines section 15064(h)(1), this Initial Study evaluates the cumulative impacts of the project using the list approach, by considering the incremental effects of the proposed project in connection with the effects of past, current, and probable future projects. With regard to the list method, this Initial Study evaluated the proposed project's contribution to cumulative impacts associated with related past, current, and probable future projects which are mainly those projects within five miles of the proposed project site and have the potential to contribute to the impact that is evaluated in this Initial Study.

For a list of past, current, and probable projects within the unincorporated area of Ventura County that were included in this analysis, please refer to Table B below, and the attached map (Attachment 17).

Table B – Pending/Recently Approved County Projects within 5-Mile Radius

Permit/ Application Number	Permit Type	Description	Status
California Energy Commission 2015-AFC-02	Application for Certification	Mission Rock Energy Center, LLC proposes to construct, own, and operate an electrical generating plant.	Terminated Application in 2019
PL17-0154	CUP	CUP to authorize a Commercial Organics Processing Operation	Pending
PL19-0109	Subdivision	Conditional Certificate of Compliance for an illegal lot	Pending
PL19-0111	CUP Modification	Development and expansion of ministorage facility	Approved on 1/21/2021
PL20-0021	Subdivision	Lot Line Adjustment	Pending
PL20-0048	CUP	Wireless Communications Facility	Pending
PL20-0058	CUP Modification	Automobile Salvage Yard – Time Extension	Approved on 2/17/2021
PL20-0089	CUP Modification	Kennel Operation	Approved 1/20/2021
PL20-0092	CUP Modification	Wireless Communications Facility	Approved 6/15/2021
PL20-0097	Subdivision	Parcel Map for the legal subdivision of one legal lot into two legal lots	Approved on 2/8/2021
PL20-0124	Permit Adjustment	Add shade structure to existing dog kennel	Approved on 3/1/2021
PL20-0132	CUP Modification	Automobile and truck dismantling yard – Time Extension	Pending
PL21-0023	CUP Modification	Addition of Health and Programming Unit at Todd Road Jail	Approved on 3/10/2021
PL21-0041	Subdivision	Lot Line Adjustment	Pending
PL21-0057	Permit Adjustment	Legalize an after-the-fact equipment shelter for an existing warehousing facility	Approved 8/05/2021

The list of past, current, and probable projects within the city limits of the City of Santa Paula (within a 5-mile radius of the project site) that were included in this analysis can be found at the following website: https://www.google.com/maps/d/viewer?mid=12R5WJvERI7z73mOGg_P39ApYGNmWk79_&ll=34.35559719246486%2C-119.06773665000001&z=14 and in Table C below:

Permit/ Application Number	Permit Type	Description	Status
2015-CDP-06	Development Permit	Bender Industrial 60,000 sq. ft. industrial shell building Acres (approx.): 2.59 630 Todd Lane, Santa Paula	Approved
2020-CUP-04	Conditional Use Permit	Jackson House Recovery Center 16-bed inpatient behavioral health facility Adaptive reuse of existing vacant building Acres (approx.): 0.50 811 W. Telegraph Road, Santa Paula	Approved
2020-CUP-02	Conditional Use Permit	People's Self-Help Housing (PSHH) 68 deed-restricted affordable apartments Acres (approx.): 1.95 714 W. Harvard Blvd., Santa Paula	Pending
2018-CDP-04	Development Permit	Harvard Professional Center 2 commercial/medical office buildings 10,000 sq. ft. single-story 20,000 sq. ft. two-story Acres (approx.): 1.92 500-550 Harvard Blvd., Santa Paula	Approved
2018-CDP-01	Development Permit	Santa Paula Self Storage Too 40,000 sq. ft. self-storage facility Acres (approx.): 2.84 324 E. Main St., Santa Paula	Approved
2012-CDP-05	Development Permit	Santa Maria Industrial Park 9-acre industrial park Sites available for development Acres (approx.): 9.90 324 W. Main St., Santa Paula	Approved
2021-CUP-01	Conditional Use Permit	Reward Path Recovery Center Expansion from 6- to 8-bed residential alcohol/drug treatment facility Acres (approx.): 0.39 525 E. Main St., Santa Paula	Pending
2020-DR-04	DR	Tiny Quad Homes 12-unit deed restricted affordable apartments 420 sq. ft. each Acres (approx.): 0.18 720 E. Main St., Santa Paula	Pending

Permit/ Application Number	Permit Type	Description	Status
2018-DR-09	DR	Gunsmoke BBQ Renovation of existing restaurant space for new business Acres (approx.): 0.08 817 E. Main St., Santa Paula	Approved
2020-CUP-09	Conditional Use Permit	Paseo Café Restaurant and wine bar Acres (approx.): 0.07 926 E. Main St., Santa Paula	Pending
2018-CDP-03	Development Permit	King Building Apartments 6-unit apartments above main floor retail within existing building Acres (approx.): 0.21 927-929 E. Main St., Santa Paula	Pending
2020-CUP-08	Conditional Use Permit	Good Orchard Café Restaurant and catering 10th Street Plaza 20-unit apartments Adaptive reuse of existing multi-story church offices/classrooms Acres (approx.): 0.77 133 N. Mills St., Santa Paula	Pending
2016-CDP-07	Development Permit	La Terraza Event Center Renovation of warehouse/retail space for new banquet hall next to existing restaurant Acres (approx.): 0.14 1080 E. Main St., Santa Paula	Approved
2021-DR-02	DR	11th Street Townhomes 10-unit townhome project Acres (approx.): 0.38 11St. & Main St., Santa Paula	Pending

Section B – Initial Study Checklist and Discussion of Responses[20]

***Key to the agencies/departments that are responsible for the analysis of the items above:**

Airports - Department Of Airports
AG. - Agricultural Department
VCAPCD - Air Pollution Control District
VCFPD - Fire Protection District
EHD - Environmental Health Division
Lib. Agency - Library Services Agency
WPD – Watershed Protection District
Harbors - Harbor Department
Sheriff - Sheriff's Department
Plng. - Planning Division
PWA - Public Works Agency
GSA - General Services Agency

****Key to Impact Degree of Effect:**

N – No Impact
LS – Less than Significant Impact
PS-M – Potentially Significant but Mitigable Impact
PS – Potentially Significant Impact

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
RESOURCES:								
1. Air Quality (VCAPCD)								
Will the proposed project:								
a) Exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the Ventura County Air Pollution Control District (VCAPCD), or be inconsistent with the Air Quality Management Plan?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 1 of the Initial Study Assessment Guidelines?		X				X		

Impact Analysis

1a. In accordance with the Ventura County General Plan and the Ventura County Administrative Supplement to the CEQA Guidelines, all County agencies, departments and special districts shall utilize the Air Quality Assessment Guidelines (AQAGs)[21] as adopted and periodically updated by the Ventura County Air Pollution Control District (APCD). The AQAGs recommend specific criteria and threshold levels for determining whether a proposed project may have a significant adverse air quality impact and provide mitigation measures that may be useful for mitigating the air quality impacts of proposed projects. APCD has adopted a policy stating that general development projects whose

[20] The threshold criteria in this Initial Study are derived from the *Ventura County Initial Study Assessment Guidelines* (April 26, 2011).

[21] The AQAGs is an advisory document that provides lead agencies, consultants, and project applicants with a framework and uniform methods for preparing air quality evaluations for environmental documents.

emissions are expected to meet or exceed the criteria in Section 3.3 of the AQAGs (Recommended Significance Criteria), will have a potentially significant adverse impact on air quality.

SETTING AND FACILTY DESCRIPTION

The existing non-hazardous wastewater treatment facility is surrounded by industrial and agricultural land uses, both of which have the potential to affect ambient air quality. Existing agricultural operations adjacent to the facility, approximately 50 feet to the north and west, have the potential to generate air emissions from herbicide and pesticide application[22] and from fugitive dust. Industrial operations to the south (oil and gas production) and east (auto salvage yard) have the potential to generate air emissions, primarily dust. Additionally, large trucks travelling along Mission Rock Road have the potential to generate diesel and dust emissions near the facility, in addition to emissions generated from nearby SR 126.

The proposed project consists of non-hazardous brine and stormwater, industrial, and domestic wastewater processing. These processes utilize equalization tanks, chemical treatment tanks, centrifuges/belt presses, and drying pads. The facility would also include drill mud and oil/gas liquid waste processing systems as well as processing of wastes such as tank bottoms, other oilfield waste containing oil, and other liquids with reactive organic compounds (ROC). These processes utilize shakers, recirculation tanks, cyclones, centrifuges, “mixing areas,” clarifying tanks, equalization tanks, and potassium permanganate treatment. The existing CUP allows the following truck limits:

Table 1 – Current CUP Truck Limits

Trip Type	Weekly Trucks
Supply Deliveries	4
Outgoing waste/recyclable product	16
Waste Deliveries	480 (80 per day, 6 days/week)
Existing CUP weekly total:	500
Average trucks/day:	83.3
Average daily trips (ADT):	166.6

As shown above in Table 1, the existing CUP establishes a weekly limit (six days a week) of 500 total trucks. The applicant proposes to remove the existing CUP distinction between delivery trucks and outgoing waste trucks and proposes an overall weekly truck

[22] The APCD does not regulate herbicide/pesticide applications. The application of herbicides/pesticides are within the jurisdiction of the Ventura County Agricultural Commissioner’s Office.

limit for the facility. Table 2 below summarizes the applicant's proposed changes to the truck limits.

Table 2 – Proposed Truck Limits

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

Utilizing the Average Daily Trip (ADT)[23] definition from the Ventura County Initial Study Assessment Guidelines, which counts as an individual trip each leg of a round-trip (a single truck entering and exiting the facility counts as two trips) as opposed to the "trucks" metric which count a truck entering and exiting as a single "truck" for purposes of the 500-weekly limit, results in a maximum of 1,000 total weekly trips (500 trucks max x 2 trips per truck). Applying the six day per week maximum to the total weekly trips results in a 166.7 ADT (1000 total weekly trips divided by 6, or doubling the average trucks/day figure of 83.3).

The applicant proposes to adhere to the maximum weekly truck limit of 500 (two-way, roundtrips) for all delivery trucks and adds a new daily maximum truck limit of 100 (i.e., 200 ADT trips), as the existing CUP did not establish a daily maximum truck limit. This allows the applicant some flexibility on allowable total trucks on individual days over a six-day operational week while still requiring that they adhere to the strict weekly limit of 500 total trucks.

The baseline of total trucks to the facility is derived from data contained in copies of the former operator's manifest records and waste volume records from the year 2014 (the last operational year of the facility). Based on this information, the 2014 estimated baseline is 61.8 trucks per day (i.e., 123.6 ADT trips).(Attachment 8). A thorough analysis of the baseline ADT and impacts from the proposed CUP is set forth more fully below.

LOCAL AIR QUALITY

The Ventura County Initial Study Assessment Guidelines (ISAGs) define "local" air quality impacts as, "*The amount or concentration of dust, odors, carbon monoxide, and toxics present in the ambient air*." APCD staff conducted a qualitative analysis for project-

[23] See Footnote 6.

generated emissions for those emissions described above using the threshold criteria in the most recently adopted AQAGs.

Based on information provided in the project description, the proposed oilfield wastewater process will be subject to the rules and regulations of the APCD. As stated previously, the proposed project consists of processes utilizing equalization tanks, chemical treatment tanks, centrifuges/belt presses, and drying pads, in addition to drill mud and oil/gas liquid waste processing systems and processing of wastes such as tank bottoms, other oilfield waste containing oil, and other liquids with a reactive organic compound (ROC) content in excess of 5 milligrams per liter (mg/l). These processes utilize shakers, recirculation tanks, cyclones, centrifuges, "mixing areas," clarifying tanks, equalization tanks, and potassium permanganate treatment. Except for the oilfield wastes processing system, all liquids and other wastewater processing systems must have a ROC content of less than 5 mg/l. If the ROC concentration of these wastes is determined to be greater than 5 mg/l, the wastes must be processed in the tank bottoms processing system which would be equipped with a vapor recovery system. Any liquids with an ROC content of less than 5 mg/l are exempt from an APCD Permit to Operate (PTO), pursuant to APCD Rule 23 (Exemptions from Permits),[24] and Rule 71.1.D.1.3 (Crude Oil Production and Separation),[25] such as the non-hazardous stormwater and domestic wastewater.

APCD Permit Requirements

The applicant will be required, as a condition of approval, to obtain an Authority to Construct (ATC) permit (Rule 10.A) as soon as the facility design is finalized and prior to the issuance of a Zoning Clearance for Construction. APCD permit applications can be processed in parallel with other environmental permits, but the APCD ATC cannot be issued until the project has been approved by the appropriate decision-making body (APCD Rule 13.C.2), which in this case is the Ventura County Board of Supervisors. Additionally, as a condition of approval, any existing, new or modified equipment installed at the facility subject to the APCD permit authority will be required to comply with all applicable APCD rules including, but not limited to, Rule 10 (Permits Required),[26] Rule

[24] APCD Rule 23 provides a list of operations, equipment or emission sources that are exempt from the requirement to obtain an APCD PTO.

[25] APCD Rule 71.1 are provisions that apply to equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer.

[26] APCD Rule 10 provides the requirements for, and exemption from, obtaining an ATC and PTO.

26 (New Source Review-BACT),[27] Rule 50 (Opacity),[28] Rule 51 (Nuisance),[29] Rule 55 (Fugitive Dust),[30] Rule 71.1 (Crude Oil Production and Separation) (see footnote 4), and Rule 74.10 (Components at Crude Oil and Natural Gas Production and Processing Facilities).[31]

Likewise, potential odors and toxic air contaminants from the facility must comply with Rule 51 (Nuisance), potential dust from the facility shall comply with Rule 50 (Opacity), and Rule 55 (Fugitive Dust), and equipment not requiring APCD permits with the potential to emit odors or dust must also comply with Rules 50, 51, and 55 (See footnotes 7-9.).

The applicant will be required, as a condition of approval, to obtain an APCD PTO prior to the issuance of a Zoning Clearance for Use Inauguration (Rule 10.B). The applications will be subject to a New Source Review (Rule 26), imposing Best Available Control Technology (BACT), which will require the most stringent emission limitation or control technology for any emissions unit. The emission limitation or BACT must meet any of the following requirements: (1) has been achieved in practice for such emissions unit category; or, (2) is contained in any implementation plan approved by the Environmental Protection Agency (EPA) for such emissions unit category; or, (3) any other emission limitation or control technology, including, but not limited to, replacement of such emissions unit with a lower emitting emissions unit, application of control equipment or process modifications, determined by the APCD Officer to be technologically feasible for such emissions unit and cost effective as compared to the BACT cost effectiveness threshold adopted by the APCD. In addition to other applicable PTO requirements, as a

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[27] APCD Rule 26 specifies the New Source Review provisions that are applicable to new, replacement, modified or relocated stationary emissions units.

[28] APCD Rule 50 provides the requirements, test methods, and exemptions for the opacity of emissions. Opacity is the degree to which visibility of a background (i.e., blue sky) is reduced by particulates (smoke).

[29] APCD Rule 51 provides prohibitions on the discharge of air contaminants that cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endangers the comfort, repose, health or safety of any such persons or the public. It is mainly enforceable via complaint verification.

[30] APCD Rule 55 specifies the provisions for any operation, disturbed surface area, or man-made condition capable of generating fugitive dust, including bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

[31] APCD Rule 74.10 specifies leak requirements for crude oil and gas production and processing components (valves, stuffing box, dump lever arm, open ended line, fittings, pump seals, pressure relief valve, hatch, etc.).

condition of the facility's applicable PTO, the applicant will be required to maintain the following records in order to comply with Rule 26 (New Source Review, General): (1) monthly and rolling twelve-month barrels of oilfield wastes received and processed; (2) annual barrels of oil transferred at the recovered oil loading facility; and, (3) daily monitoring log for the carbon adsorption systems.

In order to comply with the BACT requirements of Rule 26.2 (New Source Review, Requirements), the proposed RI-NU facility shall be designed, constructed, and operated with the following features:

(1) All oilfield waste water, and any recovered crude oil, shall be processed in enclosed tanks equipped with pressure / vacuum relief valves and vapor recovery systems. Recovered gas shall be controlled with a thermal oxidizer, catalytic oxidizer, or carbon adsorption system.

(2) Drilling muds and tank bottoms shall also be stored and processed in enclosed tanks equipped with vapor recovery systems as described above. Shakers, cyclones, and centrifuges used for dewatering and solids separation shall be conducted in closed vessels without exhaust systems or equipped with an exhaust vapor recovery and control system.

(3) The oil, water, solids separation equipment and tanks shall be equipped with a vapor recovery system. The recovered solids/inert bulking agent mixing area shall include equipment, procedures, and work practices that minimize emissions and odors. This recovered solids mixing area will not require any buildings or large enclosures to capture and control emissions/odors. An engineering analysis will be conducted to confirm BACT compliance for this process operation, along with other applicable rules and regulations, when an ATC is submitted to APCD by the applicant.

It is also important to consider the facility's prior permit history . The facility's previously approved PTO (PTO No. 00171) that was valid until December 31, 2017, included some of the following same emissions sources as the proposed project:

- Vapor Control Carbon Adsorption System #1, consisting of two sets of 2 – 2,000 pounds carbon vessels in series, "Barneby Sutcliffe 2000;"

- Vapor Control Carbon Adsorption System #2, consisting of one set of 2 – 2,000 pounds carbon vessels in series, "Barneby Sutcliffe 2000;"

The facility's previously approved PTO also required that the carbon adsorption system be maintained to have a ROC reduction efficiency of 90% or greater. In order to comply with this requirement, the ROC concentrations were measured daily at each system's

vapor exhaust stack to establish the carbon breakthrough period. The ROC concentration at each exhaust stack was limited to not exceed 10 parts per million by volume (ppmv), measured as methane (Rule 26.2.A – BACT). Any of the tanks subject to APCD's crude oil storage rules relating to tanks holding liquids having a ROC concentration exceeding 5 mg/l were also required to be closed at all times, except during sampling or attended maintenance operations, and all their vapors were passively routed to the above-referenced carbon vessels via manifolded piping above tanks. The tanks' hatches and other inlet and outlet piping connections were required to comply with the leak requirements of Rule 74.10 (Components at Crude Oil and Natural Gas Production and Processing Facilities) (See footnote 10.).

In addition to the facility's previously approved PTO, the former operator held an air permit for the processing of oilfield-produced water from oil skimming pits, recovered oil storage tanks, associated oil truck loading facilities, and the like, during a 10-year period, from 2000-2010. Free oil was removed from the produced water and the water was then treated to the City of Oxnard wastewater treatment plant requirements. As mentioned previously, liquids having an ROC concentration of below 5 mg/l , are not subject to APCD permit requirements.

Permitted sources are inspected annually by APCD Compliance staff to ensure that all permitted air pollution-emitting sources comply with the APCD rules and regulations and applicable provisions of the California Health and Safety Code and Environmental Protection Agency (EPA) regulations. During an annual APCD compliance inspection on June 21, 2010, SCWW (previous operator) alerted APCD Compliance staff that the facility had begun accepting and processing other oilfield waste products such as workover fluids and drilling muds. APCD Compliance staff advised the operator that these additional activities may need to be added to the existing PTO for the facility, depending on the ROC content of the fluids. A Notice to Comply (NTC) was issued to SCWW to submit technical documentation and laboratory analysis of workover fluids/drilling muds to determine if the newly added operations required an APCD PTO. All of the required information was submitted to the APCD and on July 30, 2010, the facility was found to be in compliance. The newly added workover fluids and drilling muds processing system was found to be exempt from PTO requirements due to lab analysis submitted (ROC content of the fluids being less than 5 mg/l).

During the next required annual compliance inspection on April 28, 2011, the SCWW operator notified APCD staff that the facility continues to accept oilfield waste products and also began accepting tank bottom materials. APCD Compliance staff advised the operator that these additional activities may need to be added to the existing PTO for the facility. APCD Compliance staff detected ROC readings of over 2,000 ppm from the tanks processing the tank bottoms. The detection of ROC leaks greater than the ROC maximum allowable (1,000 ppm) in the APCD Vapor Recovery Rule 71.1 (see footnote 4) prompted APCD to issue a Notice of Violation on April 28, 2011 (Violation No. 22711) for installing and operating the additional oilfield waste processing equipment without the required

APCD ATC (Rule 10.A) and PTO (Rule 10.B). On May 26, 2011, in response to this Notice of Violation, APCD staff received an application from SCWW to permit the processing of the additional oilfield wastes that contained ROC in excess of 5 mg/l of fluid. All of the required information was submitted to the APCD. On May 31, 2011, the facility was re-inspected by APCD Compliance staff and found to be in compliance with the updated PTO.

On March 4, 2014, the facility's PTO was renewed. It included all oilfield waste processing systems with an oil content greater than 5 mg/l and listed exempt processes such as domestic wastewater, brine, and industrial water for informational purposes. The permitted oilfield waste processing system included receiving tanks, centrifuges, oil/water separation tanks, oil storage tanks, an oil truck loading rack, and cyclones and shakers for solids dewatering. The permit also included an open mix area for the mixing of oilfield solids with bulking agents (commonly sawdust, mulch, or green waste) and a covered solids storage area for long term storage of the oilfield solid / sawdust mixtures. Additional control measures (BACT) were required, such as covering the solids storage area with heavy-duty plastic or sheeting and limiting the amount of time solids can remain in the mixing area (Facility's PTO Permit Conditions 4c and 4d). Solids were recycled or disposed of in compliance with solid waste regulations.

Similar to the requirements of the previous facility, for the proposed project, an APCD engineering analysis will also be conducted to confirm BACT compliance for this process operation, along with other applicable rules and regulations, as soon as the APCD Engineering Division receives an application from the applicant. Again, equipment not requiring APCD permits that have the potential to emit odors or dust must also comply with Rules 50 (Opacity), 51 (Nuisance), and 55 (Fugitive Dust) (See footnotes 7-9.). In order to comply with the BACT requirements of APCD Rule 26 (see footnote 6), the oil, water, solids separation equipment and tanks shall be equipped with a vapor recovery system. The recovered solids/inert bulking agent mixing shall include equipment, procedures, and work practices that minimize emissions and odors. The recovered solids mixing area will not require any buildings or large enclosures to capture and control emissions/odors unless otherwise determined necessary by the APCD Engineering Division. The applicant is not proposing to process domestic waste in the open mixing areas as was done previously. Therefore, the odor potential has been greatly reduced, as confirmed via the previous facility's complaint history, discussed below.

Equipment for the processing of certain domestic and industrial waste sources do not require APCD permits if their ROC concentration is below 5 mg/l (Rule 71.1.D.1.3). This is also because liquids such as septic waste, brine waste and other industrial wastes are not expected to emit hydrocarbons because they do not contain any materials which have a modified Reid Vapor Pressure more than or equal to 0.5 pound per square inch absolute (psia) that may cause dissolved gasses to be emitted into the atmosphere.

In addition, the wastewater streams will be delivered onsite via truck and transferred to their respective receiving tanks via pipe hose manifold. As stated in the applicant's project description, "*other than the use of hoses to unload waste hauling trucks…transfer of fluids and waste material to and from the waste processing equipment will be via pumps and hard piping. The pumps, pipe fittings and transfer points will be inspected regularly to ensure they are not leaking.*" If the wastewater streams contain ROCs, such as the oily wastewater and oilfield sludge wastes, those streams are equipped with control technologies as a precaution and to avoid over-pressure (such as the proposed vapor recovery-carbon adsorption system). The use of the carbon adsorption system is also specified in EPA Method AP-42 as control technologies for ROC-containing wastewater streams (EPA Method AP-42 Section 4.3.3).

A domestic waste processing system was operating at the previous facility and is suspected of creating significant amounts of odors as a result of the "open pits" (mixing areas) of domestic waste on the property. In order to mitigate and minimize potential odors from domestic waste processing at the proposed facility, the applicant has redesigned the domestic waste processing operation to a closed-looped system which no longer utilizes the open solids mixing areas. (See Attachment 10 and Nuisance Odors section below.) As a condition of approval, the applicant will be required to operate the facility in compliance with APCD Rule 51 (Nuisance), which prohibits the applicant from discharging such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, for the life of the operation of the wastewater treatment facility.

Nuisance Odors

A total of 25 complaints related to odor at the previous facility were received by the APCD from 1996 through its closure in 2014. The screening distance between the odor emission source of logged odor complaints and odor receptors was less than 2 miles (AQAGs, Table 6.3, Project Screening Distances for Odorous Land Uses). Most of the complainants were located downwind of the facility either on the eastern boundary or southern boundary of the property and were mostly neighboring businesses. Out of the 25 investigated odor complaints, 16 had wind directions and speeds which were recorded by the complaint inspector. Out of the 16 wind-recorded complaint investigations, 14 had onshore wind flow (from West to East) at an average of 7.1 MPH and 2 had offshore winds (from East to West) at an average of 7.5 MPH. A majority of the odor complaints occurred in the years 2013, 2003, and 2001 and were specific to odors related to uncovered stockpiles of domestic waste located in the open mixing areas), which are no longer part of the proposed project. Out of the 25 odor complaints, one resulted in the issuance of a Notice of Violation, dated June 19, 2003. The violation case was abated and closed. All of the odor complaints that were either a cited nuisance violation or confirmed by an APCD inspector (11 out of 25) were odors emanating from "septic" or "sewage type" waste. After the November 2014 fire incident and subsequent closure of the facility, any potential odors were generated by materials that remained onsite. The previous facility's April 2015 approved Emergency Use Authorization (EUA) Permit, which

authorized clean-up and recovery activities at the facility after the incident, required the operator to use Best Management Practices (BMPs) as determined by the APCD in order to reduce any nuisance odors generated from the clean-up activities. To date, all of the required clean-up activities authorized pursuant to the EUA Permit have been successfully completed as determined by Planning and Environmental Health Divisions, and no further odor impacts attributable to the 2014 incident have been identified.

The facility's previously approved PTO included the following requirements on the "open pits" for the processing/storage of receiving tank solids: (1) the temporary mixing area (i.e., Mixing Area #1) be used only for the mixing of the receiving tank solids with a solidification reagent (typically sawdust); (2) the materials shall not be located in the mixing area more than four hours in duration before being transferred to the "Oilfield Solids Storage Area"; and, (3) the mixing areas shall be cleaned out after each use. Upon submission of APCD applications for the proposed facility, APCD will evaluate the proposed tank solids processing system and ensure full compliance with all applicable rules and regulations to be included in the new PTO. The processing of oilfield waste water, drilling muds, and tank bottoms is expected to result in minimal odors if designed, installed, and operated in accordance with the BACT recommendations (referenced above in the "APCD Permit Requirements" section at page 36) and any additional requirements the APCD Engineering Division deems necessary.

On January 4, 2019, the applicant revised the proposed project to include revisions for the domestic waste treatment process, which have a potential of emitting odors as noted in the previous facility's compliance history. The proposed system will be enclosed where domestic waste will be pumped from the trucks through a basket screen or screen box to remove larger solids and then sent to closed top mixing tanks. From these tanks the domestic waste stream will be pumped through a centrifuge where solids and liquids will be separated. Domestic waste liquids will be sent to closed tanks and then sent offsite for proper disposal via tank trucks. Solids will be dropped from the centrifuge through an enclosed chute into a closed top bin. Once full, the bin will be shipped offsite to dispose of the solids. The practice of mixing domestic waste solids with other solids in the mixing areas will no longer be conducted.

To ensure that potential odors that may result from operating activities at the proposed facility are minimized, the applicant shall, as a condition of approval, comply with the applicable provisions of Rule 51 (Nuisance) (see footnote 8), the final approved Odor Impact Plan for the project, and any requirements of the applicable APCD PTO. Rule 51 prohibits the applicant from discharging such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. In order to comply with Rule 51, as a condition of approval, the applicant shall develop a protocol to assess sources of odors and provide nearby citizens with a means to report odor issues to the facility operator, so complaints can be quickly received, investigated, and remediated. The applicant proposes to incorporate APCD-required odor minimization protocols into the Odor Minimization Plan

(Attachment 18), which will also be part of the final Operation and Maintenance (O&M) Manual for the facility, prepared by the applicant (Attachment 19). As a condition of approval, the applicant will be required to submit the final O&M Manual to the Planning Division, in consultation with APCD, who will verify the required APCD odor impact minimization protocols are included in the facility's O&M Manual prior to the issuance of a Zoning Clearance for Construction of the facility.

Another condition of approval of the proposed project involves signage. Signage will be required to be installed in an area visible by the general public that illustrates the APCD Complaint Line telephone number for public complaints regarding any violations of the applicable APCD rules and regulations, including dust and odor complaints, during construction and for the duration of the operation. A sign plan that includes the APCD Complaint Line information shall be submitted to the Planning Division (and in consultation with the APCD) for review and approval prior to the issuance of a Zoning Clearance for Construction. The approved sign shall be installed prior to the start of construction and shall remain onsite for the duration of the operation of the facility.

Fugitive Dust

A total of three complaints related to dust at the previous facility were received by the APCD from 1996 through its closure in 2014. Out of the three dust complaints, one resulted in a violation of Rule 55 (Fugitive Dust) (see footnote 9) and subsequently, a Notice of Violation, dated June 29, 2001, was issued to the former operator. The violation has since been abated and closed. The specific violation was for mud track-out caused by the transfer trucks entering/exiting the facility entrance. Mud track-out is dirt, mud, or other debris tracked onto a paved roadway by a vehicle leaving a facility. The dirt and mud are adhered to the tires of the vehicle leaving the facility, which then deposits the debris onto the roadway.,. In order to comply with APCD rules for fugitive dust control (Rule 55), the former operator installed a rumble grate and an 8-foot perimeter fence, along with application of wood chips, cobble stones, and asphalt throughout the site. These track-out control devices are used to keep the roadway outside of the facility where dirt and mud are involved, clean and free of rocks, dirt and debris. Similar to the previous facility's track-out control devices, the applicant proposes preventative track-out measures in a Dust Control Plan (Attachment 20), which include regularly checking and cleaning the undercarriage and wheels on all vehicles before leaving unpaved surfaces and/or installing a rumble grate. The facility will also be required to display the APCD 24-hr Complaint Line telephone number to ensure these provisions are being met and enforcement action taken if needed.

Section 6.2 of the AQAGs state, "*Occasionally, the District may recommend that a project's potential to affect ambient particulate concentrations be analyzed with an appropriate air pollutant dispersion computer model.*" The AQAGs also state that "[t]*he District will recommend that PM modeling be conducted if, in its opinion, project-related activities and operations may generate airborne PM in such quantities as to cause an exceedance of a particulate ambient air quality standard in an area where people live and*

work, including, but not limited to, residential areas, schools, day care centers, office complexes, and hospitals. Examples of projects that may require supplemental modeling include mining and quarrying operations, landfills, and excavation and grading operations for large development projects. If the District recommends a particulate modeling analysis, it will provide guidance as to appropriate models and modeling protocols."

The APCD did not recommend PM modeling (i.e., air pollution dispersion computer model) for the proposed project because in its expert opinion, it did not believe the amount of dust that would be generated by the proposed project would cause an exceedance of an ambient particulate air quality standard. That is because the project site's truck routes are paved, a Dust Control Plan (Attachment 20) has been submitted by the applicant to minimize fugitive dust, the facility would have an air permit with enforceable permit conditions related to APCD dust and nuisance rules (Rules 55 and 51, respectively), and dust control conditions would also be incorporated into the proposed CUP. Furthermore, measures beyond the recommended dust mitigation measures contained in Section 7.4.1.1 of the AQAGs will be included as conditions of approval of the proposed CUP, such as having signage of the APCD 24-hr Complaint Line telephone number posted onsite and viewable to the public.

Although a majority of the existing project site is and will be covered with impervious surface, some areas will remain unpaved. Due to the previous facility's dust complaint history and to ensure that fugitive dust and particulate matter that may result from proposed operating activities on the site are minimized, the applicant shall, as a condition of approval, comply with the provisions of applicable APCD rules and regulations, which include but are not limited to, Rules 50 (Opacity), 51 (Nuisance), and 55 (Fugitive Dust) (see footnotes 7-9), as well as any requirements of the applicable APCD PTO. In addition to the dust control measures already contained in the Dust Control Plan (Attachment 20), the applicant will be required as conditions of approval of the proposed CUP to implement the following dust control measures at the facility:

- Installation of onsite signage limiting traffic to 15 miles per hour or less and displaying the APCD 24-hr Complaint Line telephone number;
- Utilizing watering trucks to control fugitive dust in unpaved areas onsite; and,
- Requirement for personnel/contractors to wear respiratory protection for activities involving grading in accordance with California Division of Occupational Safety and Health (CAL OSHA) regulations.

The applicant will be required to incorporate the above-referenced dust control measures into the applicant's Dust Control Plan (Attachment 20) prepared by Sespe Consulting, Inc., which will also be included in the final O&M Manual for the facility. As a condition of approval, the applicant will be required to submit the final Dust Control Plan and final O&M Manual to the Planning Division who will verify that the required APCD dust control

measures are included in these documents prior to the issuance of a Zoning Clearance for Construction of the facility.

Air Quality Management Plan Consistency

According to the AQAGs, projects are inconsistent with the Air Quality Management Plan (AQMP) if the proposed project will cause the existing population to exceed the population growth forecasts. The geographic subareas used in the population forecasts are known as growth and non-growth areas. These areas are based on a network of analysis zones created by the State Department of Transportation and the Ventura County Public Works Agency. The growth areas are comprised of aggregated analysis zones. Attachment 21, "Ventura County Growth and Non-Growth Areas," is a map that shows the growth and non-growth areas of the county. The Santa Paula Non-Growth Area is identified as number 19 on the attached map. The entire present and projected boundary of each of the ten cities in the county is within a respective growth area. The remainder of the AQMP population forecast covers the unincorporated non-growth areas. These areas are not expected to receive significant urban development.

The population forecasts comparison is to be done if the operational emissions of a proposed project exceed 2 lbs./day of ozone precursor pollutants reactive organic compounds (ROC) or nitrogen oxides (NOx) (AQAGs, section 4.2). The estimated project emissions for NOx were estimated at 4.65 lbs./day, as discussed in the following section, therefore, an AQMP consistency analysis is required. The proposed project would create 28 new jobs to the unincorporated area (12 existing employees to a total of 40 proposed employees), which conservatively may increase the population by 28 people. The most recent unincorporated population count is 99,815 (County of Ventura RMA Jurisdiction Reports Q4Y20). Adding 28 new residents, assuming they would relocate to the unincorporated area, would increase the population to 99,843. This is still below the projected 2025 population growth increase of 104,182, pursuant to the Southern California Association of Government's (SCAG) Regional Transportation Plan (RTP), which is used in predicting population forecasts for the county in the most recent AQMP 2016. Therefore, the proposed project would not conflict or obstruct implementation of the most recent AQMP adopted (Initial Study Item Checklist C, Air Quality, Item 1) and would have a less than significant impact on air quality.

Section 4.2 of the AQAGs also require that the project be consistent with emission reduction strategies included in the AQMP. The 2016 AQMP emission reduction control measures are categorized by stationary and mobile sources. None of the new stationary source control measures (AQMP, Table 3-2) are applicable to the proposed project. For mobile source emissions, however, which are the greatest emission source of NOx in Ventura County and the 2nd largest emission source for ROC (AQMP, Figures 2-2, 2-3), the AQMP has a list of transportation control measures (TCMs) as recommendations to further reduce smog-forming pollutants. While state and federal law prohibit local air districts from regulating mobile sources (AQMP, Page 31) since they are regulated by CARB and the EPA, local air districts recommend the TCMs based on emission reduction

measures contained in the Southern California Association of Governments (SCAG)-adopted 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Federal Transportation Improvement Program (FTIP), or most recently adopted SCAG RTP/SCS plan. (AQMP, Page 46).

Some of the TCMs listed in the AQMP are trip elimination, vehicle substitution, reduction of vehicle miles travelled, increased vehicle occupancy, and technological improvement. Trip elimination strategies have been proposed by the applicant, including having a portion (potentially up to 50 percent) of the incoming non-domestic waste delivery trucks that are unloading untreated waste, "back-haul" the treated non-domestic waste to be transferred to an off-site disposal facility. A back-haul truck is an incoming industrial waste truck that offloads its contents and immediately loads treated industrial waste onsite for transfer to an off-site disposal facility rather than having a separate truck come to receive the treated waste for transport off-site, as outlined in the applicant's proposed Onsite Traffic and Queuing Plan (Attachment 13). Using back-haul trucks as part of its proposed operation would allow the applicant to maximize the efficiency of the total truck limit within the weekly and daily maximums, and presumably may result in fewer trucks than would otherwise be used, and consequently, potentially reducing operational air emissions. The applicant's back-hauling system is only discussed in this Initial Study to show the applicant's internal practice of maximizing the efficiency of the truck limit in a way that may potentially reduce the total number of trucks. But because back-hauling does not change the maximum allowable truck limit otherwise allowed, it is not incorporated into the operational emissions calculation for the facility.

Telecommuting is not a viable option for the on-site employees as their work demands them to be onsite. Vehicle substitution would also not be viable for this project as most of the vehicle trips will be for the waste delivery trucks and an alternative mode of transportation is not practical (walking, biking, etc.) due to the nature of the facility operations. Reduction of vehicle miles travelled (VMT) will inherently occur as a result of the project. Without treatment of waste streams at the proposed facility, all untreated wastes would need to be trucked further away for any preliminary treatment processes, whereas preliminary treatment processes at the proposed facility would reduce the amount of wastes that would need to be trucked offsite and outside the county for further disposal. Other waste treatment facilities can be as far as 130 miles for oil and gas liquids and solids (Central Valley Waste Water, Kern County, CA), 112 miles for industrial non-hazardous liquids (Starlite Reclamation Environmental Services, Fontana, CA), and 82 miles for industrial solids (Avalon Environmental Services, Gardena, CA). The nearest waste disposal site in Ventura County is at the Simi Valley landfill, but it is only for acceptance of industrial solids and oil and gas liquids and solids. In addition, information obtained from the applicant includes a promotion of hiring on-site employees locally, which should reduce the amount of daily and annual VMTs.

Furthermore, recent technological improvements have been made to the delivery trucks that transport hydrocarbon waste (oilfield-related). These trucks will have an on-site vapor

recovery system in which the vapors displaced during fluid collection onsite will be redirected back to the manifolded storage tanks providing a closed-loop system. In addition, the oilfield waste delivery trucks will have a bottom-loaded vapor recovery system, have a submerged fill pipe for the reduction of spill and sloshing inside the truck tank (reducing overpressure inside tank), and have an overfill/spill prevention equipment installed, pursuant to Rule 71.3 (Transfer of Reactive Organic Compound Liquids)[32]. In sum, consistency with the AQMP is achieved through reducing vehicle miles traveled, technological improvements, and does not result in population growth in the Santa Paula Non-Growth Area beyond the population forecasts of the SCAG RTP/SCS. Therefore, the project would have a less than significant impact on air quality.

LOCAL AIR QUALITY IMPACTS CONCLUSION

Based on the above data, with implementation of APCD's rules and regulations, standard conditions of approval, and additional odor control measures imposed on the domestic wastewater processing system, project-specific impacts are less than significant related to local air quality.

REGIONAL AIR QUALITY

The ISAGs define "regional" air quality impacts as, "*The concentration of ozone or particulate matter in the ambient air.*" Thus, contrary to local air quality impacts, which focus on dust, odors, carbon monoxide, and toxics present in the ambient air, assessing a project's regional air quality impacts involve a quantitative analysis of a project's ozone-producing emissions against its significance thresholds, ROC and NOx. When reacted with sunlight, ROC and NOx create ozone (O3), a criteria pollutant and smog-forming compound.

The APCD has adopted thresholds of significance for operational emissions of both ROC and NOx at 25 pounds per day for the Santa Paula Non-Growth Area. In addition, the recently adopted Ventura County 2040 General Plan includes new policy HAZ-10.11 requiring the County to "*consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act*" and to include APCD-permitted stationary source emissions in a CEQA air quality analysis of discretionary projects (i.e., CUP). The County Planning Division implements this policy by requiring, during CEQA review, quantification and disclosure of the project's estimated ozone precursor emissions from both mobile sources and stationary sources (including emissions that are subject to APCD's permitting and regulatory program), and discussion of the APCD permit(s) and regulations that would apply to and address project emissions. In accordance with the AQAGs, the County considers APCD's permitting and regulatory program to constitute mitigation under CEQA for air quality impacts associated with APCD-permitted emissions (i.e., emissions from equipment or operations requiring APCD permits). (See County

[32] APCD Rule 71.3 specifies provisions for equipment used to transfer reactive organic compound (ROC) liquids with a Modified Reid Vapor Pressure (MRVP) greater than or equal to 0.5 psia.

Board Letter August 6, 2019, Page 21-22). Thus, in accordance with the AQAGs, APCD-permitted emissions are not to be counted toward APCD's significance thresholds of 25 pounds per day (AQAGs § 1.1, §5.4).[33]

The applicant has not yet obtained an approved ATC with APCD, as this is a condition of approval of the modified CUP and would occur after approval of the CUP by the decision-making body. APCD has also communicated with the applicant that it can perform parallel-processing with the modified CUP application process for a better emissions estimate, but this process is not required. Because an ATC application was never submitted to APCD during the time this Initial Study was being prepared, APCD has made a best estimate of stationary criteria emissions based on expert knowledge of proposed permitted operations, the former facility's APCD permit (since the proposed facility will be using similar equipment and conducting similar operations), proposed annual material processed, and a Health Risk Assessment for an exhaustive analysis. An "intended compliance objective" (i.e. the previous engineering review and any APCD compliance objectives) was a best estimate of facts and "reasonable assumptions predicated upon facts and expert opinion support by facts" [CEQA Guidelines §15064(f)(5)]. Operations that would be subject to APCD rules and regulations have been identified and a best estimate emissions estimation was performed based on proposed throughputs. The analysis under the "Permitted Emissions" section is for disclosure purposes to be consistent with the County General Plan Policy HAZ-10.11; however, as noted, the APCD-permitted emissions are not counted toward the 25 pounds per day significance threshold for regional air quality impacts. The operational emissions estimated for assessing regional air quality impacts that do count toward the significance threshold is found in the discussion below.

The regional air quality impacts are derived using a statewide emissions estimating computer model, CalEEMod (California Emissions Estimator Model) Version 2016.3.2, which calculates ozone precursor pollutants based on direct emissions from construction and operations (area, energy, mobile). In order to estimate the level of emissions counting toward the significance threshold, the baseline emissions must first be quantified.

The baseline emissions estimate was calculated using the former facility's most recent operational data from 2014. (See Attachment 8). Because the applicant was unable to provide a log of daily truck trips from the prior operations, a 2014 incoming waste volume summary by month (waste volumes by waste type come from totaling daily sales records for each month for each waste stream) was averaged instead to best estimate the baseline of daily truck loads per day. The number of delivered waste loads were calculated assuming a truck size based on the waste type: domestic waste loads are 30 barrels, solid waste loads are 20 tons, and all other waste loads are 120 barrels.

[33] Although not counted toward the significance thresholds, APCD-permitted emissions are discussed below on page 52 in "Permitted Emissions."

Conservatively, the calculations assumed that every load was full, meaning that the daily truck trips estimate was the lowest but most substantiated total. Loads per day were calculated using six days per week of waste delivery, and evidence demonstrating that the facility was open and accepting waste for 45.6 weeks in 2014, for 273.4 days. Based on the best available evidence (Attachment 8), the 2014 estimated baseline of truck trips is determined to be 123.6 ADT per day (i.e., 61.8 trucks per day) and 24 ADT (i.e.,12 vehicles per day) for employees.

This baseline estimate approach is consistent with CEQA Guidelines section 15125(a)(1)-(3) where the lead agency has discretion in its definition of baseline conditions based on substantial evidence presented in order to provide the most accurate picture practically possible of the project's likely impacts.

Importantly, the baseline emissions have already been accounted for in the CEQA process from the previous CUP approval. For assessing significance thresholds, the emissions above these baseline emissions (i.e. the proposed increase) must be assessed. Based on proposed project information provided by the applicant, those increased emissions above the baseline will result from the proposed increase of daily employee commutes (proposing an additional 28 employees above baseline and assuming each employee drives their own vehicle), increase in truck delivery trips per day as compared to the former facility's last year of incoming delivery operations in 2014 (see Attachment 8) and energy emissions from the proposed additions of a 1,056 sq. ft. office with restroom, 648 sq. ft. laboratory with restroom and eyewash sinks, 610 sq. ft. hazardous materials storage building, and 864 sq. ft. changing/break room.

Using the computer model to quantify these increased mobile and energy emissions, the project's regional air quality emissions above the baseline that count toward the 25 pounds per day threshold of significance are calculated to be 0.29 lbs./day ROC and 4.65 lbs./day NOx. (See Table 4 below.) These are both well below the 25 pounds per day significance threshold.

Most of the proposed operational emissions will be generated from mobile sources. The air emissions model includes expected increases from baseline for on-site employee commutes (assumed to all be light-duty trucks) and incoming waste delivery trips (assumed to all be heavy duty diesel trucks) at maximum operational capacity. The model incorporates proposed hours of operation, with proposed truck deliveries and proposed on-site employee commutes to and from the facility occurring Monday-Saturday and only proposed on-site employee commutes occurring on Sundays[34]. A summary table of the baseline and proposed trips is found in Table 3 below and is broken down in the following discussion.

[34] The proposed hours of operation do not include waste delivery truck trips on Sundays.

The existing CUP authorized a total of 15 employees, but the information available indicates that the facility operated with 12 employees. This equates to a representative baseline of 12 employee commuter vehicles per day (i.e., 24 ADT counting both the entrance and exit trips). Twenty-eight new employees above baseline are proposed for a total of 40 on-site employees. The addition of 28 employees equates to 28 new vehicles per day (i.e., 56 ADT trips) for a total of 80 ADT (24 ADT (baseline) plus 56 ADT (new)). The difference between the total proposed employee vehicle trips (80 ADT) and the total baseline employee vehicle trips (24 ADT) equates to an increase of 56 ADT. See Table 3 below.

In addition, the proposed CUP allows a maximum of 500 delivery trucks per week (i.e.,1000 ADT, Monday-Saturday). Because the model requires input parameters in daily estimates, a daily truck trip average was calculated based on the weekly maximum of 1,000 ADT (500 trucks) divided by the operational days per week for truck trip deliveries (Monday-Saturday). This equates to a maximum daily average of 166.7 ADT, or 83.3 trucks per day.

The applicant proposes to add a new daily maximum truck limit of 100 (i.e., 200 ADT trips), as the existing CUP did not establish a daily maximum truck limit. This daily limit places a reasonable cap on the total number of trucks per day while allowing the applicant some flexibility for allowable trucks on individual days over a six-day operational week, so long as they still adhere to the strict weekly limit of 500 total trucks.

As described previously, based on the best available evidence (Attachment 8), the 2014 truck trips baseline is determined to be an average of 123.6 ADT trips per day (i.e., 61.8 trucks per day). The difference between the proposed maximum average truck trips per day and the baseline (123.6 ADT) equates to an increase of 43 ADT (Attachment 8). Therefore, the overall increase in ADTs for both the employee vehicle trips (56 ADT) and the delivery truck trips (43 ADT) is 99 ADT.

A summary table (Table 3) of the baseline and proposed trips from Attachment 8 is found below.

Table 3 – Summary of Applicant's ADT Analysis

Trucks	
Currently Permitted and Proposed Trucking:	500 trucks/week
	1,000 truck trips/week[35] (ADT)
Proposed Average Daily Trips (ADT):	166.7 ADT (83.3 trucks/per day)
Baseline – Actual Daily Loads from 2014 Records:	61.8 loads/per day

[35] Based on a six-day week (Monday-Saturday).

	123.6 ADT
Proposed ADT increase from 2014 Baseline (difference between baseline and proposed):	(166.7 ADT proposed truck trips – 123.6 ADT baseline truck trips) = **43.1 ADT**
Employees	
Currently Permitted Number of Employees:	15 per day (15 vehicles/day)
Baseline – Number of Employees:	12 per day (12 vehicles/day)
	24 ADT
Proposed Number of Employees:	40 per day (40 vehicles/per day)
	80 ADT
Proposed ADT increase from 2014 Baseline (difference between baseline and proposed):	(80 ADT proposed employee trips – 24 ADT baseline employee trips) = **56 ADT**
TOTAL ADT Increase (trucks and employees):	(56 ADT + 43.1 ADT) = **99.1 ADT**

For estimating construction emissions, the project description states that most of the existing facility is already built out and construction would involve replacing some of the old tankage and equipment with new tanks and equipment. The proposed office, laboratory, and employee changing/break room will be trailer-style (modular) facilities that do not require groundbreaking construction onsite. The applicant also stated that no architectural coating operations would be performed onsite during the construction phase as new equipment and structures would already be coated prior to purchasing. In addition, the equipment/structures would be pressure-washed, not re-coated, for maintenance purposes. However, the applicant proposes to pave the facility with approximately 4,852 sq. ft. of concrete. The concrete paving operation would result in approximately 0.84 lbs./day of ROC emissions and 7.27 lbs./day of NOx emissions. Per AQAGs section 5.2, construction-related emissions of ROC and NOx are not counted toward the significance threshold of 25 lbs./day since these emissions are temporary in nature, but construction emission reduction measures are still recommended if estimates exceed 25 lbs./day. The CalEEMod report for construction emissions are located in Attachment 23 and is a separate report from the operational emissions estimate generated which is shown in Attachment 22. Even though construction emissions were below the recommended threshold, emission reduction measures will still be recommended by incorporating standard conditions of approval to the CUP pursuant to Rule 50 (Opacity), 51 (Nuisance), and 55 (Fugitive Dust) (See footnotes 7-9.). A summary table (Table 4) with all project air emissions by source category is located below.

Table 4 – Proposed Operational Ozone Precursor Emissions

Source Category	ROC (lbs./d)	NOx (lbs./d)
Area	.037	0.00
Energy	.00046	.0042

Mobile	.25	4.65
Stationary[1]	1.37	0.00
Construction[2]	.84	7.27
Total Including APCD-Permitted Emissions	2.50	11.92
TOTAL Without APCD-Permitted Emissions	**0.29**	**4.65**
VCAPCD Threshold	**25**	**25**
Exceed Threshold?	**No**	**No**

[1] *APCD-Permitted emissions not counted towards significance threshold. See subsection "Permitted Emissions" in Regional Air Quality Impact Discussion Section.*

[2] *Construction emissions not counted towards significance thresholds due to temporary nature. COAs still recommended for short-term emission reductions. See AQAG Section 5.2.*

**Emissions rounded to conform with CalEEMod reports*.

Permitted Emissions

Emissions subject to the APCD permitting process must be quantified and considered for purposes of CEQA but do not count toward the APCD's regional air quality significance thresholds. The project's stationary source emissions (i.e., treatment of oilfield wastes or any liquids containing more than 5 mg/L ROC), which are subject to the APCD permitting process, will undergo a separate engineering analysis which will require compliance with all current state, federal, and District rules and regulations (i.e., those described in LOCAL AIR QUALITY section above). According to the AQAGs, stationary source emissions are not included in the air quality significance determination since permitted emissions are subject to new source review requirements which require a separate permit with the APCD. The recently adopted Ventura County 2040 General Plan includes a new policy HAZ-10.11 that requires the County to "*consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act*" and to include APCD-permitted stationary source emissions in a CEQA air quality analysis of discretionary projects. The County implements this policy by requiring, during CEQA review, quantification and disclosure of the project's estimated stationary source emissions (including emissions that are subject to APCD's permitting and regulatory program) and discussion of the APCD permit's rules and regulations that would apply to the proposed project under review. APCD's permitting and regulatory program constitutes mitigation for air quality impacts associated with APCD-permitted emissions under CEQA (See County Board Letter August 6, 2019, Pages 21-22). Therefore, in accordance with the AQAGs sections 1.1 and 5.3, APCD-permitted emissions are not to be counted toward APCD's regional air quality significance thresholds of 25 pounds per day.

A robust best-estimate analysis of the project's APCD permitted emissions was performed based on the former facility's most recent APCD permit as set forth in the following section, along with a discussion of the APCD permit and regulations that would apply to and address the project's ROC and NOx emissions. As a condition of approval of the proposed CUP and under the law, the applicant will be required to obtain an ATC

permit with APCD prior to the issuance of a Zoning Clearance for Construction of the proposed facility. The applicant has not yet obtained an approved ATC with APCD, as this is a condition of approval of the modified CUP and would occur after approval of the CUP by the decision-making body. APCD has also communicated in the past with the applicant that it can perform parallel-processing with the modified CUP application process for a better emissions estimate, but this process is not required.

The proposed facility's APCD-permitted emissions, for the proposed equipment listed below, were calculated as follows: The storage tanks' working losses were calculated with a requested throughput of 360,000 barrels per year (distributed between the two tanks) and the APCD's default emission factor of 12.23 lbs. of ROC per thousand barrels for liquid with vapor pressure of less than 1.5 psia. Breathing losses were calculated using the APCD's default emission factor of 0.43 lb. of ROC per barrel capacity for tanks less than twelve feet filled with liquid with vapor pressure of less than 1.5 psia. A 90 percent control efficiency was assumed for the carbon adsorption system. The EPA Method AP-42 default emission factor of 2.736 lbs. of ROC per thousand gallons oil was used for the loading rack with an annual throughput limit of 200 barrels per year and an assumed hourly loading rate of 120 barrels per hour. The loading rack was uncontrolled. The previous facility's most recently permitted equipment is listed in Table 5 below. APCD has not received any ATC applications from the applicant for the proposed facility and/or current project, and therefore APCD staff can, at this time, provide only a best estimate. A detailed engineering analysis can only be conducted once the ATC application is received. However, as a best estimate, an ROC emissions calculation will be performed. Based on information provided by the applicant, the total oil-related throughput is projected to be about 107,714 barrels per year, or 4,524,000 gallons per year, which is about 70 percent less than formerly permitted (Attachment 24). Based on the estimated oil-related waste throughput, and assuming the number of equipment onsite is the same as the most recently issued PTO with the former facility (PTO No. 00171) and using the same emission factors, the proposed facility's total permitted emissions are estimated to

Table 5 - Previous Facility's Permitted Equipment

Expected Permitted ROCs	T/Yr	lbs./d	Calculations*
2 – 500 bbl Receiving Tanks	0.09	0.49	=53857*12.23*0.1*2/(1000*2000)+(0.43*500*0.1*2/2000)
1 – 500 bbl Separation Tank	0.08	0.44	=107714*12.23*0.1/(1000*2000)+(0.43*500*0.1/2000)
1 – 120 bbl Oil Recovery Tank	0.07	0.38	=107714*12.23*0.1/(1000*2000)+(0.43*120*0.1/2000)
1 – Oil Loading Facility	0.01	0.05	=(200*42*2.736/1000)/2000
Total Emission Increase	0.25	1.37	**calculations for T/Yr. Converted to lbs./d by multiplying by 2,000 and dividing by 365. Total is rounded up from non-rounded totals.*

Rule 26.2.A (New Source Review, Requirements) (see footnote 6) details the BACT requirements for new, replacement, modified, or relocated emissions units. This rule has a zero threshold for BACT for ROC, NOx, PM-10, and SOx. There is no BACT requirement for carbon monoxide (CO). At the time the engineering analysis for the previous facility's PTO Application 00171-181 was conducted, vapors from receiving permitted tanks were routed to a carbon adsorption system. The system was monitored for breakthrough. The exhaust had a 10 ppmv ROC concentration limit with daily monitoring requirement, which was assumed to be equivalent to 90 percent control efficiency. This emission limit was attainable because the monitoring was for breakthrough and the emissions were expected to be negligible. The permitted tanks were required to meet the leak rate requirements of Rule 74.10 (Components of Crude Oil and Natural Gas Production and Processing Facilities) (See footnote 10.). The solids storage area was required to be covered with heavy duty plastic or sheeting. Permit condition language of Rule 74.29.B.6 (Soil Decontamination Operations, Requirements)[36] was used.

Rule 26.2.B (see footnote 6) details the emission offset requirements for new, replacement, modified, or relocated emissions units. The permitted ROC emissions from this stationary source, as a result of the previous facility's 2011 PTO application, remained below the offset threshold of 5.0 tons per year. Therefore, no offsets were required at that time.

At the time the engineering analysis for the previous facility's PTO Application 00171-181 was conducted, the routing of ROC tank vapors to the carbon adsorption unit complied with the control efficiency requirement of Rule 71.2 (Storage of Reactive Organic Compound Liquids)[37], Section C.4. These tanks were post-custody transfer; therefore Rule 71.1 (Crude Oil Production and Separation) (see footnote 4), did not apply. The former permit also included requirements that the tanks be covered, and components not leak; that spent carbon be disposed of properly; and, that processed solids be stored in covered bins. These conditions were applied pursuant to Rule 29 (Conditions on Permits)[38] and Rule 51 (Nuisance) (see footnote 8) compliance. The former permit also

[36] APCD Rule 74.29.B.6 specifies requirements for soils that contain gasoline, diesel fuel, or jet fuel.

[37] APCD Rule 71.2 specifies provisions for equipment used to store crude oil or reactive organic compound (ROC) liquids with a modified Reid vapor pressure greater than 0.5 psia. This rule does not apply to any storage equipment subject to Rule 71.1, to any gasoline storage container with a capacity equal to or less than 40,000 gallons, or to any storage container with a capacity equal or less than 5,000 gallons.

[38] APCD Rule 29 specifies requirements for applying any reasonable conditions to an ATC or a PTO which are necessary to assure or demonstrate that a stationary source and all emissions units at the stationary source will operate in compliance with applicable state

included requirements for compliance with Rule 55 (Fugitive Dust) (See footnote 9.). Storage piles and unpaved roads were potential areas that would need to comply with Rule 55.

The expected emissions from the previous facility's PTO Application 00171-181 did not exceed any of the APCD Engineering Section Toxics-New Source Review policy thresholds and a health risk assessment was not required to demonstrate compliance with Rule 51 (Nuisance) (see footnote 8) (the facility was only permitted for ROC-containing oilfield wastes). The addition of the tank bottoms receiving system was not expected to create a significant risk and did not require a health risk assessment. The former permit required that spent carbon be disposed of properly. The former operator stated that waste liquids with high hydrogen sulfide content or high ammonia content were not accepted at the facility.

The previous facility's 2011 PTO application did not trigger the public notification requirements of Health and Safety Code section 42301.6 since the applicant stated that this source is not located within 1,000 feet of the outer boundary of a school site. The application did not trigger the notification requirements of Rule 26.7 (New Source Review, Notification) since the potential to emit of the new, replacement, modified, or relocated emissions units covered by this application are below the thresholds of Table B-1 of Rule 26.7. In addition, this application did not contain a request to certify emission reduction credits.

In sum, the quantification and consideration of the previously-permitted emissions are necessary to comply with the purpose of CEQA and General Plan Policy HAZ-10.11, but are not counted toward the thresholds of significance for regional air quality impacts. APCD-permitted emissions were estimated using the best available information at the time the initial study was prepared and the emission control rules the project is subject to were discussed in the context of the project's proposed oilfield-related waste processing operation. The APCD will review the facility's permit application when it is received and will be treated as a new facility subject to BACT requirements.

REGIONAL AIR QUALITY IMPACTS CONCLUSION

Based on the above data, project-specific impacts are less than significant related to regional air quality.

CUMULATIVE AIR QUALITY IMPACTS

Pursuant to the CEQA Guidelines section 15064(h)(1), the lead agency evaluates the potential cumulative impacts of the proposed project using the list approach by considering the incremental effects of the proposed project in connection with the effects

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and federal emission standards and with APCD rules, including permit conditions required by Rule 26, New Source Review.

of past, current, and probable future projects. The APCD identified one project on the cumulative project list (Section A.13, Table B, above) that warrants review for potentially significant cumulative air quality impacts. This project is a natural gas-fired electrical generating facility called the Mission Rock Energy Center (MREC).

Background Regarding Proposed RI-NU and MREC Projects

The proposed project would be located approximately 1,730 feet away from the MREC. The MREC, if approved, would be regulated by the APCD on air quality issues. The proposed MREC's proximity to the proposed project is within the APCD's screening distance of 1-2 miles for assessing localized non-ozone air quality impacts for odorous land uses (AQAGs*,* Table 6-3).

On December 31, 2015, Mission Rock Energy Center, LLC submitted an Application for Certification to the California Energy Commission (CEC) seeking authority to construct and operate the MREC. This facility would be a natural gas-fired, simple-cycle combustion turbine electrical generating facility rated at a nominal generating capacity of 275 megawatts (MW), co-located with battery units for the storage of electricity that can deliver an additional 25 MW of electricity.

The CEC is the lead agency for the MREC project under CEQA and has a certified regulatory program under CEQA. Under its certified program, (deemed equivalent to CEQA), the CEC is exempt from having to prepare an EIR. Its' certified program, however, does require environmental analysis of the project, including an analysis of alternatives and mitigation measures to minimize any significant adverse effect the project may have on the environment. This environmental review was commenced but was never completed.

During the CEC review process, the APCD issued a Preliminary Determination of Compliance (PDOC) for the proposed MREC project which included rigorous air quality analysis, including a New Source Review pursuant to Rule 26, and a Risk Management Review of air toxic pollutants pursuant to Rule 51 (Nuisance) (see footnote 8). (*CEC Docket # 15-AFC-02, TN 221497*). Prior to APCD's issuance of a Final Determination of Compliance for the project, MREC would have to provide Emission Reduction Credits (ERCs) to comply with the emission offset requirements of Rule 26.2 to offset, at a 1.3 to 1 ratio, the MREC's oxides of nitrogen (NOx) emissions.

On May 21, 2019, the MREC applicant applied for a withdrawal of application for certification (CEC Docket # 15-AFC-02, TN 228356). On June 6, 2019, the CEC closed the docket and removed Proof of Service (CEC Docket # 15-AFC-02, TN 228698).

Based on the cancellation of the MREC project's Application for Certification, it is uncertain whether the application will be reinstated, approved by the CEC, and whether the project will be constructed and operated.

Cumulative Regional Air Quality Impacts - Ozone

Both projects would create reactive organic compounds (ROC) and oxides of nitrogen (NOx) emissions, which are ozone precursor emissions (create ozone when reacted with sunlight). Assessment of cumulative regional air quality impacts is conducted by estimating ozone precursor emissions in the ambient air for a given project. The APCD determines regional significant impacts from these ozone precursors in accordance with the AQAGs. Because the operational emissions from both the proposed RI-NU project and proposed MREC project would be subject to APCD's stationary source permitting program, the emissions generated by both facilities are not counted towards the CEQA thresholds of significance for impacts on air quality since they are mitigated by APCD emission control rules (AQAGs § *1.1*). The APCD's permitting program involves a comprehensive engineering air analysis and regulatory program for pollutants for both applicable APCD rules and federal and state regulations to ensure consistency with the APCD's AQMP. The MREC project would have to comply as part of the APCD's regulatory program with the aforementioned NOx offset requirement. In addition, both RI-NU's and MREC's future APCD PTO would include monitoring and enforcement requirements to ensure all applicable air quality rules and regulations are being met. As a result, the cumulative air impact for the projects' APCD-permitted stationary source emissions will be less than significant.

Cumulative Local Air Quality Impacts

Dust and Odors

Local air quality impacts involve a qualitative analysis for project-generated emissions of dust, odors, carbon monoxide, and toxics, if applicable. Both the proposed project and MREC's APCD permits will incorporate the requirements of Rules 50 (Opacity), 51 (Nuisance), and 55 (Fugitive Dust) (see footnotes 7-9, respectively). APCD's standard permit requirements addressing these issues, along with APCD's continuous monitoring and enforcement, will effectively control fugitive dust and odor-related emissions on both facilities and will therefore avoid significant cumulative impacts.

Carbon Monoxide

Carbon monoxide (CO), a criteria air pollutant, will be accounted for and controlled by the APCD permitting program for both proposed projects. In addition to the projects' operational emissions (which will require APCD permits), CO emissions can be generated from mobile sources on-site such as delivery trucks and employee vehicles. Some localized areas, such as traffic-congested intersections, can have elevated levels of CO concentrations (called CO hotspots). CO hotspots are defined as locations where ambient CO concentrations exceed the State Ambient Air Quality Standards (20 ppm, 1-hr, 9 ppm, 8-hr). In Ventura County, ambient air monitoring for CO stopped in 2004 with the approval of the EPA, Region 9, (California Jurisdiction) because CO background concentrations in El Rio, Simi Valley, and Ojai were much lower than the State Ambient Air Quality Standard (highest recorded CO background concentration in Ventura County was in Simi Valley at 6.2 ppm, 1-hr, 1.6 ppm, 8-hr (AQAGs, Table 6-2)). Therefore, no CO hotspots are

expected to occur in the Mission Rock Road area where both proposed projects would be located, and additional CO modeling analysis is not warranted.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as air pollutants (excluding ozone, CO, PM_{10}, SO_2, NO_2) that may reasonably be anticipated to cause cancer, developmental effects, reproductive disfunctions, neurological disorders, heritable gene mutations, or other serious or irreversible acute or chronic health effects in humans. TACs were identified and assessed for MREC by the MREC applicant and the APCD. The APCD's Risk Management Review states in summary that "the acute and chronic hazard indices are below 0.5 and the cancer risk associated with the project is less than 10 in a million. In accordance with the APCD policy 'Air Toxic Review of Permit Applications' (revised 7/10/02), the [MREC] project would be approved for TACs as proposed." For more information related to MREC's TACs analysis, you may obtain an electronic copy from the CEC Docket Project No. 15-AFC-02 and the District's website at http://vcapcd.org/Mission-Rock-Energy-Center.htm.

In order to be granted an APCD ATC, the proposed wastewater treatment facility must comply with the APCD permit policy "Air Toxics Review of Permit Applications" (Attachment 25). The APCD will review the proposed project in further detail during the APCD permit application process to be sure that it complies with the following health risk thresholds:

Cancer Risk: Less Than or Equal to 10 in a million
Acute and Chronic Non-Cancer Risk Hazard Index: Less Than or Equal to 1

A TAC analysis for the previous facility was conducted for comparison purposes between the previous facility and the proposed facility as a best estimate without an APCD permit application from the applicant. The health risk assessment assumes that the proposed facility will have emissions the same or similar to the previous facility's APCD permit with similar equipment and vapor recovery control methods. The health risk assessment was conducted using the California Air Toxic Hot Spots Program Facility Prioritization Guidelines developed by the California Air Pollution Control Officers Association (CAPCOA). The health risk assessment includes the fugitive emissions from the oilfield waste liquids storage and processing tanks, and oil loading facility. There is no proposed natural gas-fired combustion equipment at the proposed facility that is subject to APCD permitting requirements. The following priority scores were calculated for cancer risk, non-carcinogenic short-term (acute) health risk, and non-carcinogenic long-term (chronic) health risk:

Priority Score	Cancer Risk	Chronic Risk	Acute Risk
Fugitive Emissions	1.09	0.0285	0.0312
Total:	1.09	0.0285	0.0312

The numbers above indicate that all priority scores are less than or equal to one and therefore, the proposed facility is considered to be a low priority facility that does not result in a significant health risk. According to the CAPCOA Prioritization Guidelines, a prioritization score of 10 or greater is considered to be a high score that requires a more detailed health risk assessment. Prioritization scores of one or below indicate that the facility is not considered to have a significant health risk. Attachment 26 includes the TAC analysis conducted by the APCD.

CUMULATIVE AIR QUALITY IMPACTS CONCLUSION

In accordance with Section 3.3 of the AQAGs, the project will not have a significant cumulative adverse air quality impact because it will not directly or indirectly cause the existing population to exceed the population forecasts contained in the most recently adopted AQMP, as previously discussed. In addition, the project is consistent with applicable emission reduction strategies included in the AQMP as previously discussed. Based on the foregoing, the APCD has determined that the proposed project will not have a significant impact since the project is consistent with the AQMP.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2A. Water Resources – Groundwater Quantity (WPD)								
Will the proposed project:								
1) Directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin?		X				X		
2) In groundwater basins that are not overdrafted, or are not in hydrologic continuity with an overdrafted basin, result in net groundwater extraction that will individually or cumulatively cause overdrafted basin(s)?		X				X		
3) In areas where the groundwater basin and/or hydrologic unit condition is not well known or documented and there is evidence of overdraft based upon declining water levels in a well or wells, propose any net increase in groundwater extraction from that groundwater basin and/or hydrologic unit?		X				X		

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4) Regardless of items 1-3 above, result in 1.0 acre-feet, or less, of net annual increase in groundwater extraction?		X				X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 2A of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

2A-1, and 2A-2. The Ventura County Watershed Protection District (WPD), Groundwater Section reviewed the proposed project and determined that the project site overlies the Santa Clara River Valley Groundwater Basin, Santa Paula sub-basin (Department of Water Resources (DWR) Bulletin 118 Basin No. 4-004.04), an adjudicated subbasin designated as very low priority. The Subbasin is in hydrogeologic continuity with the Oxnard Subbasin (DWR Basin No. 4-004.02), which is designated as critically overdrafted. Potable and process water for the wastewater treatment facility is currently provided by the City of Santa Paula, which obtains water exclusively from groundwater wells within the Santa Paula Subbasin. All wells and groundwater extractions in the Santa Paula Groundwater Basin are subject to the jurisdictional control of the Santa Paula Pumpers Association.

Water service will continue to be provided by the City of Santa Paula by means of an existing 1.5-inch meter (Meter No. 11314216). A *Conditional Will Serve Letter for 815 Mission Rock Road, APN: 099-0-060-565*, dated October 26, 2020 and amended on March 15, 2021, was provided by the City of Santa Paula (Attachment 27). The letter states that one of the conditions for issuance of a Will Serve Letter is a water-use study showing existing and proposed water demands.

The existing CUP authorized a total of 15 employees, but the information available indicates that the facility operated with 12 employees. The applicant proposes to permit an additional 25 employees from the 15 existing, permitted (or 28 additional employees above the baseline of 12 employees) for a total authorization for 40 full-time employees. The applicant also proposes 26,862 sq. ft. of landscaping. On January 23, 2018, the applicant submitted historical water use records and a projected water demand for the project. On January 15, 2019, the project applicant submitted a revised landscape plan and irrigation water demand. The revised value from the 2018 estimate to the 2019 revised estimate increases annual water demand for the project by approximately 0.2 acre-feet. The projected water demand will be 52.6 acre-feet per year (AFY) and includes the combined volumes for potable water, restroom use, waste treatment operations, fugitive dust control, irrigation/landscape water use, and loss of recharge to the basin due to the addition of impervious surfaces. Historic water use records from 2011 to 2013

average 56.6 AFY. Implementation of the project will result in an estimated water reduction of 4.0 AFY from average historical water use. The project is not expected to individually or cumulatively decrease the net quantity of water in the basin or create an overdrafted condition. Therefore, the proposed project will have a less than significant impact on groundwater quantity.

2A-3. The proposed project does not overlie an area where there is no documented groundwater basin, and the hydrologic unit condition is not well known.

2A-4. Implementation of the proposed project will result in an estimated water reduction of 4.0 AFY from historic water use.

2A-5. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 2A of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2B. Water Resources - Groundwater Quality (WPD)								
Will the proposed project:								
1) Individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Basin Plan?		X				X		
2) Cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Basin Plan?		X				X		
3) Propose the use of groundwater in any capacity and be located within two miles of the boundary of a former or current test site for rocket engines?	X				X			
4) Be consistent with the applicable General Plan Goals and Policies for Item 2B of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
2B-1. and 2B-2. The proposed laboratory and office will contain restroom facilities that will be connected to an on-site wastewater treatment system (OWTS) (i.e., septic system). The applicant reports that chemical wastes from the laboratory will be contained

in chemical resistant containers for packing and off-site disposal and will not be discharged to the proposed OWTS. The laboratory chemicals or wastewater will be manifested and sent offsite to an appropriate receiving disposal facility if determined to be hazardous waste. During the construction phase of the project, construction workers will utilize portable toilets until the septic system is installed and approved by the County.

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.

Hazardous materials (chemicals) used during the waste treatment process will be stored near the point-of-use in “dry 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 material containers stored in the proposed hazardous materials storage building.

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 bermed 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 shipping using hoses that originate from the bermed domestic sewage storage area.

The site plans and project description did not indicate or show a secondary containment liner (i.e., 80-mil HDPE) in the bermed areas and the areas occupied by chemical tanks and waste/liquid transfer areas. The proposed project could potentially cause the quality of groundwater to fail to meet the groundwater quality objectives and affect the beneficial uses of groundwater resources set by the Los Angeles Regional Water Quality Control Board (LARWQCB) Basin Plan, unless conditions are implemented to enhance containment of chemical and waste liquid tank and transfer areas. As conditions of approval, the applicant shall submit detailed plans of each containment area for liquid removal and for liquid waste and petroleum products to the WPD for review and approval to verify the type of secondary containment liner to be used in conjunction with the bermed containment and transfer areas and prior to the issuance of a Zoning Clearance for Construction in accordance with Ventura County General Plan Goals, Policies, and Programs, Policies WR-2.1, WR-2.2, WR-2.3.

In addition to the WPD proposed conditions of approval to ensure adequate containment areas for liquid removal and liquid waste and petroleum products, the applicant will implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan (Attachment 28), approved by EHD, designed to protect groundwater quality by preventing spills and other releases of petroleum-related product storage, such as produced water, drilling mud, and tank bottoms. The existing facility will infrequently generate hazardous waste in the form of waste oil, waste antifreeze, spent carbon, etc. Any waste generated will be characterized, containerized, and hauled offsite for disposal or recycling in accordance with state and federal regulations for hazardous waste storage, handling, and disposal. All hazardous materials proposed to be stored onsite will be inventoried and stored in a proposed hazardous materials storage structure atop an existing concrete pad. As mentioned above, the applicant has designed the proposed project to incorporate physical features and protocols, i.e., berms, SPCC Plan, to avoid potential impacts to groundwater quality. EHD and the Planning Division's environmental consultant, Daniel Tormey, Ph.D., P.G., reviewed the draft SPCC Plan and find that it contains the necessary operating procedures, control measures and countermeasures to contain, clean up, and mitigate the effects of a spill considered under the plan. As a condition of approval, the Permittee will be required to submit the final SPCC Plan to the Planning Division, in consultation with EHD, for review and approval prior to the issuance of a Zoning Clearance for Use Inauguration of the facility.

The proposed project does not include a request to authorize the on-site treatment of hazardous wastes. To ensure that the applicant is prohibited from treating hazardous wastes onsite, EHD has recommended a condition of approval that requires that the applicant only be allowed to accept and treat non-hazardous wastes and remain in compliance with California Code of Regulations (CCR), Title 22 (i.e., handling of hazardous wastes). In order to ensure the safe storage, handling, and disposal of potentially hazardous materials, EHD recommends a condition of approval that requires the applicant to submit a Hazardous Materials Business Plan (HMBP) to report the storage of all hazardous materials above reporting thresholds (i.e., 200 cubic feet gas, 55 gallons liquid, and 500 pounds solid). The applicant will be required to electronically report HMBP information annually on or before March 1st (or more often depending on any business plan changes) to the California Environmental Reporting System (CERS) in accordance with the California Health and Safety Code (HSC), Chapter 6.11, section 25508. The HMBP must include the following information:

- Detailed information on the inventory of hazardous materials at the facility;
- Emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material;
- Training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material; and,

- A site map that contains loading areas, internal roads, adjacent streets, storm and sewer drains, access and exit points, emergency shut-offs, evacuation staging areas, hazardous material handling and storage areas, and emergency response equipment.

The HMBP is necessary in order to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment.

With the implementation of these conditions of approval and the applicant's project design, the proposed project will have a less than significant project-specific impact and will not make a cumulatively considerable contribution to significant cumulative impacts, related to groundwater quality.

2B-3. The proposed project site is not located within two miles of the boundary of a former or current test site for rocket engines and will not have an impact on groundwater quality.

2B-4. The proposed project is consistent with the applicable General Plan Goals, Policies, and Programs for Item 2B of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department) *	**Project Impact Degree Of Effect****				**Cumulative Impact Degree Of Effect****			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2C. Water Resources - Surface Water Quantity (WPD)								
Will the proposed project:								
1) Increase surface water consumptive use (demand), either individually or cumulatively, in a fully appropriated stream reach as designated by SWRCB or where unappropriated surface water is unavailable?	X				X			
2) Increase surface water consumptive use (demand) including but not limited to diversion or dewatering downstream reaches, either individually or cumulatively, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plan?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 2C of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
2C-1. and 2C-2. Water supply for the proposed project is provided by the City of Santa Paula. The proposed project does not rely on surface water supplies in a fully appropriated stream reach as designated by the Surface Water Resources Control Board (SWRCB) or where unappropriated surface water is unavailable. Thus, the proposed project will have no impacts on surface water quantity.

2C-3. The proposed project is consistent with the applicable General Plan Goals, Policies, and Programs for Item 2C of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2D. Water Resources - Surface Water Quality (WPD)								
Will the proposed project:								
1) Individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans?		X				X		
2) Directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 2D of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
2D-1. The WPD, County Stormwater Program Section, reviewed the proposed project and determined that the project site is located directly adjacent to Cummings Road Drain, which discharges into the Santa Clara River Reach 3 (Freeman Diversion to A Street, Fillmore, CA) as defined in the Water Quality Control Plan: Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, revised October 28, 2011. The segment of the Santa Clara River downstream of the project site, including Santa Clara Estuary, Reach 1 (Santa Clara River Estuary to Highway 1 Bridge), and Reach 3 (Freeman Diversion to Street A in Fillmore, CA), are included on the Clean Water Act section 303(d) list of impaired waterbodies due to exceedances of water quality objectives for indicator bacteria, toxicity, pesticides, total dissolved solids, chloride,

selenium, and trash. Runoff from urbanized areas including industrial facilities is documented and known to include bacteria, nitrogen compounds from fertilizer application, pesticides from landscape pest controls, as well as trash and sediment from land disturbance and erosion.

Urban runoff pollution from the proposed project's existing unpermitted approximately 26,000 square feet of impervious surface and additional proposed 4,800 square feet of new impervious surface, has the potential to contribute to exceedances of water quality objectives in the downstream impaired segments of Santa Clara River Estuary and Santa Clara River Reaches 1 and 3. Any potential impact to surface water quality as a result of increased impervious surface area will be addressed by required compliance with the Part 4.E., "Planning and Land Development Program," and Part 4.F "Development Construction Program" of the Ventura Countywide National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit No. CAS004002. In addition, the Regional Water Quality Control Board - Los Angeles Region (Los Angeles Water Board) requires the operations of the wastewater treatment facility to maintain compliance with an individual NPDES Permit. As a condition of approval, the applicant is required to submit a permit application to apply for coverage under an NPDES Individual Permit and obtain approval from the Los Angeles Water Board prior to the issuance of a Zoning Clearance for Use Inauguration. An NPDES Individual Permit is written to reflect site-specific conditions of a single discharger based on information submitted by that discharger in a permit application and is unique to that discharger. NPDES Individual Permits are issued directly to an individual discharger whereas a General Industrial Stormwater Permit is issued to no one in particular with multiple dischargers obtaining coverage under that general permit after it is issued, consistent with the permit eligibility and authorization provisions.

The Los Angeles Water Board has oversight, conducts inspections, and takes on enforcement actions as appropriate for noncompliance issues. In addition, the County, under the NPDES Municipal Stormwater (MS4) Permit, is required to ensure appropriate permit coverage of industrial facilities and completion of site inspection two times during the life of the MS4 Permit. On-going countywide stormwater quality and TMDL monitoring ensures that water quality of the receiving waters, including the Santa Clara River, are maintained. Under the MS4 Permit, the County is required to prohibit illicit discharges and prevent water quality impairments. Once coverage by the new operator is obtained, the new operator will continue to implement requirements of the NPDES Permit, including stormwater runoff monitoring, and implementation of BMPs to prevent stormwater pollution. Site-specific BMPs for spill prevention, spill emergency response, and fluid or material storage are required to be developed and documented in the Stormwater Pollution Prevention Plan (SWPPP) by certified Qualified Industrial Stormwater Practitioner (QISP). The SWPPP is reviewed and approved by the Los Angeles Water Board for implementation and periodic inspections.

In addition to complying with the NPDES Permit requirements, the applicant proposes to implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan (Attachment 28). The draft SPCC Plan includes a design to protect groundwater quality by preventing spills and other releases of petroleum-related product storage, such as produced water, drilling mud, and tank bottoms. The draft SPCC Plan also includes a description of the materials stored at the facility, the discharge prevention measures, drainage control measures, spill response procedures, methods of waste disposal, containment specifications, and administrative procedures. EHD staff reviewed the applicant's draft SPCC plan and determined that it contains the required information for a SPCC Plan. The Permittee will be required, as a condition of approval, to submit a final SPCC Plan certified by a registered professional engineer to EHD for review and approval prior to renewed operations of the facility (i.e., prior to the issuance of a Zoning Clearance for Use Inauguration). More information pertaining to the draft SPCC Plan (Attachment 28) can be found under Item 20a of this Initial Study.

With the implementation of the foregoing conditions, including NPDES compliance, the proposed project will have a less than significant impact related to surface water quality objectives and standards. The project is not expected to individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives contained in Chapter 3 of the Los Angeles Basin Plan, as applicable for this area, nor is it expected to result in a violation of any surface water quality standards as defined in the Los Angeles Basin Plan.

2D-2. The proposed project site is located at 815 Mission Rock Road, unincorporated area of Santa Paula. The project site is located within the County Urban Unincorporated Area but not within a High-Risk Area. The applicant proposes a modification of CUP 960 to authorize the continued operation and expansion of the existing non-hazardous wastewater treatment facility. The facility will continue to accept, treat, and dispose offsite by trucks various types of non-hazardous waste streams. Additionally, the applicant proposes to legalize 26,335 sq. ft. of impervious surface area and construct 3,027 sq. ft. of new impervious surface area. In accordance with the Ventura Countywide Municipal Stormwater NPDES Permit No. CAS004002 (Permit), "Planning and Land Development Program" Subpart 4.E, the proposed project shall meet performance criteria defined in Section 4.E.III of the Permit and the 2011 Technical Guidance Manual (TGM). The project is also subject to the Ventura Countywide Municipal Stormwater NPDES Permit Order no. CAS004002, "Development Construction Program" Subpart 4.F, where the applicant will be required to include Best Management Practices (BMPs) designed to ensure compliance and implementation of an effective combination of erosion and sediment control measures for a disturbed site area less than 1 acre (Table 6 in Subpart 4.F, SW-1). As required by the Los Angeles Water Board and as a condition of approval, the applicant will be required to obtain coverage under an NPDES Individual Permit prior to the issuance of a Zoning Clearance for Use Inauguration.

Based on the reason explained above, the proposed project is expected to have a less than significant impact related to surface water quality objectives and standards.

2D-3. The proposed project is consistent with the applicable General Plan Goals, Policies and Programs for Item 2D of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
3A. Mineral Resources – Aggregate (Plng.)								
Will the proposed project:								
1) Be located on or immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone, or adjacent to a principal access road for a site that is the subject of an existing aggregate Conditional Use Permit (CUP), and have the potential to hamper or preclude extraction of or access to the aggregate resources?		X				X		
2) Have a cumulative impact on aggregate resources if, when considered with other pending and recently approved projects in the area, the project hampers or precludes extraction or access to identified resources?						X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 3A of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

3A-1. and 3A-2. Mineral resources consist of sand, gravel, and crushed rock used in the construction industry. The proposed project is located within an area classified as "MRZ-2" (Mineral Resource Area), which is an area in the unincorporated county where significant mineral deposits are present or where it is judged that a high likelihood for their presence exists, as mapped by the State Division of Mines and Geology and depicted on the Planning Division's Geographical Information Systems (GIS) database. Although the project site is located in the MRZ-2 area, the project site is not zoned MRP (Mineral Resource Protection), and is not directly adjacent to land zoned MRP, and therefore, would have a less than significant impact on the extraction of aggregate resources. According to the Ventura County Initial Study Assessment Guidelines, no active mining is occurring on or directly adjacent to the project site. According to the Planning Division's GIS database, there are two inactive/expired mining CUPs – CUP 1812 and CUP 245 –

within approximately 1,000 feet from the project site. Furthermore, the proposed project is not located adjacent to a road used as a principal means of access to any existing active CUPs for aggregate extraction and therefore, the proposed project will have no impact on access to extract aggregate resources. Therefore, the proposed project will have a less than significant project-specific impact and will have a less than significant cumulatively considerable contribution to significant cumulative impacts, related to the extraction of, and access to, aggregate resources.

3A-3. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 3A of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
3B. Mineral Resources – Petroleum (Plng.)								
Will the proposed project:								
1) Be located on or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road for a site that is the subject of an existing petroleum CUP, and have the potential to hamper or preclude access to petroleum resources?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 3B of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

3B-1. The proposed project is located within a Petroleum Resources area as indicated on the Planning Division's GIS database and as mapped by the California Geologic Energy Management Division (CalGEM). Petroleum resources consist of oil and gas deposits. The proposed project is located within the Saticoy Oil Field within the permit boundary of an active CUP for extraction of gas and oil (CUP 308). However, there are no actively producing oil wells within the proposed project's operational boundary and, thus, the proposed project will not hamper or preclude access to the extraction of these petroleum resources or use of existing facilities associated with CUP 308.

CalGEM reviewed the proposed project and determined that there are two wells located on the project site: "S.P.S." 17 (API 11102543) and "S.P.S." 29 (API 11102554). Oil Well "S.P.S" 17 is no longer used as an oil well. It was converted to a water source well in 2013, as confirmed by CalGEM. Since the water well is located within the project site,

CalGEM requires suitable egress and ingress distances from the activities of the proposed project. CalGEM requires a 100-foot by 80-foot setback surrounding the wellhead. Oil Well "S.P.S." 29 is an abandoned oil well and, therefore, the setback requirements are minimal. The proposed project does not include materials or equipment located directly around or within the area of "S.P.S." 29. The applicant has incorporated the CalGEM's wellhead setback requirements into the design of the proposed project. Based on this information, the proposed project will have no project-specific impact and will not make a cumulatively considerable contribution to significant cumulative impacts, related to the extraction of oil resources.

3B-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 3B of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4. Biological Resources								
4A. Species								
Will the proposed project, directly or indirectly:								
1) Impact one or more plant species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?	X				X			
2) Impact one or more animal species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?	X				X			

Impact Discussion:
4A-1 and 4A-2. The subject property consists entirely of developed industrial facilities and contains no areas capable of supporting rare plants. As a result, no direct, indirect, or cumulatively considerable impacts to special status plants are anticipated. Due to a lack of native vegetation and trees onsite, and a lack of vegetation capable of serving as habitat for wildlife, no special status wildlife is anticipated to occur on the subject property, nor within the vicinity of the subject property. As a result, no impacts to special status wildlife are anticipated, and no cumulatively considerable contribution to a significant impact is anticipated.

Mitigation/Residual Impact(s): No required mitigation. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4B. Ecological Communities - Sensitive Plant Communities								
Will the proposed project:								
1) Temporarily or permanently remove sensitive plant communities through construction, grading, clearing, or other activities?	X				X			
2) Result in indirect impacts from project operation at levels that will degrade the health of a sensitive plant community?	X				X			

Impact Discussion:
4B-1. and 4B-2. No special status or locally important plant communities occur on, or in the vicinity of, the subject property. The subject property is located in an industrial area and is adjacent to industrial and agricultural lands uses. Special status plant communities associated with the Santa Clara River occurs over 1,000 feet away from the site. Because of a lack of special status plant communities and the considerable distance between the site and off-site plant communities, no impacts are anticipated to special status plant communities. Additionally, the project will have no contribution to a cumulatively considerable impact.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4C. Ecological Communities - Waters and Wetlands								
Will the proposed project:								
1) Cause any of the following activities within waters or wetlands: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum?		X				X		

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2) Result in disruptions to wetland or riparian plant communities that will isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation?		X				X		
3) Interfere with ongoing maintenance of hydrological conditions in a water or wetland?		X				X		
4) Provide an adequate buffer for protecting the functions and values of existing waters or wetlands?		X				X		

Impact Discussion:

4C-1, 4C-2, 4C-3, and 4C-4. The subject property is located directly adjacent to (within 100 feet of) the Cummings Road Drain, a Red Line Channel managed by the Ventura County Watershed Protection District (WPD) for flood control purposes. The drain consists of an earthen channel with bare banks and scattered non-native vegetation or is devoid of vegetation altogether. The channel appears to support ephemeral flow consisting of agricultural runoff and stormwater sheet flow and some vegetation within the channel bottom. The Cummings Road Drain continues to run south and west away from the subject property for approximately 4,500 linear feet before it meets the Santa Clara River. The proposed modification to the project includes the addition of a 1.67-acre area to the south that is zoned industrial and previously served as an automobile storage and wrecking yard. The proposed project will result in an increase in impervious surface area of 4,852 square feet in an area proposed for waste receiving tanks; however, this area will be bermed to prevent runoff and potential spills. In addition, the northern and western boundaries of the property, which are closest to the Cummings Road Drain, that previously consisted of pervious area will be converted to substantial landscaping for buffering and screening the property from the Cummings Road Drain as well as the adjacent agricultural operations.

The existing CUP conditions to operate the wastewater facility allow for a non-brine discharge stream through a pipe outfall at the northwest corner of the facility to discharge stormwater into the Cummings Road Drain. However, the drain outfall was never constructed, and the proposed project modification includes removal of this component from the project. Therefore, no direct outlet and no direct discharge of wastewater to Cummings Road Drain will be constructed as part of the proposed project. Currently, stormwater does not flow directly into Cummings Road Drain, but instead pools onsite and evaporates. During significant storm events, stormwater exits the site at the

southeast driveway and eventually reaches the Cummings Road Drain by sheet flow along Shell Road.

As a condition of approval, the applicant is required to submit a permit application to apply for coverage under an NPDES Individual Permit and obtain approval from the Los Angeles Water Board prior to the issuance of a Zoning Clearance for Use Inauguration of the facility. NPDES Permit compliance ensures stormwater discharge does not significantly degrade water quality in the Cummings Road Drain or in the Santa Clara River by requiring the applicant to prepare a Post-Construction Stormwater Management Plan (PCSMP) which meets applicability criteria for significant redevelopment and a Maintenance Plan, Maintenance Covenant, and an annual verification of ongoing maintenance provisions for proposed PCSMP controls. The facility will also be required to be in compliance with the NPDES Municipal Permit. These permit conditions require regulatory water quality testing and monitoring. If stormwater quality monitoring indicates exceedances against permit threshold, then the Permittee will be required to consult with the Los Angeles Regional Water Quality Control Board to implement measures to improve runoff quality. In addition to these permit conditions, a Drainage Plan is required to be prepared and submitted for review and approval prior to the issuance of a Zoning Clearance for Construction to address the management of facility drainage, to prevent potential impacts to off-site resources, and to ensure runoff is discharged in accordance with the Ventura County Building Code, the Ventura County Public Works Agency, Watershed Protection District, and the applicable federal and state standards. The Permittee will be required to post a surety in order to ensure proper completion of the drainage plan.

No removal or alteration of vegetation associated with Cummings Road Drain or the Santa Clara River is anticipated and no grading or construction within or adjacent to the bed, bank, or channel is proposed. There will be no encroachment into the riparian zone of the Santa Clara River, nor will the project entail any removal of riparian vegetation associated with the Santa Clara River.

The Planning Division staff biologist reviewed the proposed project and determined that existing approved development already occurs closer than 100 feet from the Cummings Road Drain, and that an increased setback to the Cummings Road Drain would not be necessary since substantial changes in runoff, including velocity, siltation, and volume are not anticipated to occur as increases in impervious surface will be negligible. The California Department of Fish and Wildlife may consider Cummings Road Drain a Jurisdictional Water of the State under CEQA. However, based on the analysis provided above, impacts to potentially jurisdictional drainages are anticipated to be less than significant, and any cumulative contribution to a significant impact will be less than significant.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4D. Ecological Communities - ESHA (Applies to Coastal Zone Only)								
Will the proposed project:								
1) Temporarily or permanently remove ESHA or disturb ESHA buffers through construction, grading, clearing, or other activities and uses (ESHA buffers are within 100 feet of the boundary of ESHA as defined in Section 8172-1 of the Coastal Zoning Ordinance)?	X				X			
2) Result in indirect impacts from project operation at levels that will degrade the health of an ESHA?	X				X			

Impact Discussion:
D-1. and 4D-2. The project site is not located in the Coastal Zone. Therefore, ESHA policies and analysis do not apply. The proposed project will not result in direct or indirect impacts on ESHA.

Based on the above discussion, the proposed project will have no project-specific impacts and will not make a cumulatively considerable contribution to a significant impact on ESHA.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4E. Habitat Connectivity								
Will the proposed project:								
1) Remove habitat within a wildlife movement corridor?	X				X			
2) Isolate habitat?		X				X		
3) Construct or create barriers that impede fish and/or wildlife movement, migration or long-term connectivity or interfere with wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction?		X				X		

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4) Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?		X				X		

Impact Discussion:
4E-1. The subject property is fully developed and does not support wildlife habitat. In addition, the property is not located within the mapped landscape-scale habitat linkages mapped by the South Coast Missing Linkages. The proposed project will not result in the removal of habitat within a wildlife movement corridor and no impacts will occur.

4E-2 through E-4. No additional fencing on the property is proposed that may isolate wildlife from moving among habitats near the site. Proposed facility lighting includes light fixtures on 25-foot-high poles at the perimeter and internal lighting affixed to structures within the site or on 25-foot-high poles. A photometric plan was submitted that demonstrates light intensity values across the site that will result from proposed lighting. (See Attachment 15.) Substantial light trespass will not occur, and light fixtures are fully cut-off and directed downward, which will prevent a high-intensity bulb to be visible for long distances. The Santa Clara River, the nearest mapped wildlife corridor, is approximately 1,000 feet from the subject property, the proposed lighting will not result in substantial light trespass, nor substantially increase the amount of ambient light near the Santa Clara River. Expansion of the facility by 1.67 acres and the addition and reconfiguration of structures and equipment is not anticipated to substantially increase noise levels beyond baseline levels. As a result, direct, indirect, and cumulatively considerable impacts to habitat connectivity and wildlife movement are less than significant.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4F. Will the proposed project be consistent with the applicable General Plan Goals and Policies for Item 4 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
4F. The proposed project is consistent with the General Plan Goals and Policies for Item 4 of the Ventura County Initial Study Assessment Guidelines and does not occur within an area subject to any Ventura County Area Plan policies. The Ventura County General

Plan Biological Resources Policy COS-1.11 requires a setback of 100 feet from wetland habitats, which may be increased or decreased based upon an evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100-foot buffer include soil type, slope stability, drainage patterns, the potential for discharges that may impair water quality, presence or absence of endangered, threatened or rare plants or animals, direct and indirect effects to wildlife movement, and compatibility of the proposed development with use of the wetland habitat area by wildlife. As mentioned above in Section 4C, Ecological Communities – Waters and Wetlands, the Planning Division's staff biologist evaluated the proposed project and determined that existing approved development already occurs closer than 100 feet from the Cummings Road Drain, and that an increased setback to the Cummings Road Drain would not be necessary since substantial changes in runoff, including velocity, siltation, and volume are not anticipated to occur as increases in impervious surface will be negligible. As a result, the proposed project is consistent with General Plan Biological Resources Policy COS-1.11.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
5A. Agricultural Resources – Soils (Plng.)								
Will the proposed project:								
1) Result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance, beyond the threshold amounts set forth in Section 5a.C of the Initial Study Assessment Guidelines?	X				X			
2) Involve a General Plan amendment that will result in the loss of agricultural soils?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 5A of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

5A-1. and 5A-2. According to Planning Division GIS, State Important Farmland Inventory Maps, the proposed project has a soil designation of "Urban and Built-up Land". The proposed project is not located on, or include the request to remove, soil designated as Prime, Statewide Importance, Unique or Local. All existing and proposed operations will

occur within land designated as “Urban and Built-up”, and will not encroach onto, affect, or remove any adjacent agricultural soils. Additionally, the proposed project does not entail a General Plan amendment that will result in the loss of agricultural soils. Thus, the proposed project will have no project-specific impact and will not make a cumulatively considerable contribution to significant cumulative impacts related to the loss of agricultural soils.

5A-3. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 5A of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
5B. Agricultural Resources - Land Use Incompatibility (AG.)								
Will the proposed project:								
1) If not defined as Agriculture or Agricultural Operations in the zoning ordinances, be closer than the threshold distances set forth in Section 5b.C of the Initial Study Assessment Guidelines?			X			X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 5b of the Initial Study Assessment Guidelines?			X			X		

Impact Discussion:

5B-1. According to the Ventura County Initial Study Assessment Guidelines, any land use or project that is not Agriculture or Agricultural Operations as defined in the Zoning Ordinance will be evaluated for effects on adjacent classified farmland. Analysis is based on the distance between new non-agricultural structures and uses and any common lot boundary line adjacent to off-site classified farmland.

The proposed project consists of the continued operation and modification of a wastewater treatment plant that has been located closer than 300 feet from classified “Prime” farmland since the 1950s. The project site is bordered on the north and west by agricultural operations and on the east and south by industrial uses. The proposed project is an existing industrial operation whose boundary is closer than the threshold distances set forth in Section 5b.C of the Ventura County Initial Study Assessment Guidelines for non-agricultural uses adjacent to agriculture. The Ventura County Agricultural Commissioner’s Office determined that because the non-agricultural use is closer than the established threshold of 300 feet from an agricultural operation, the proposed project

could have a potentially significant impact on the adjacent agricultural operations. However, the project may retain the existing nonconforming setback from the agricultural operations under waiver and deviation criteria k, as set forth in the Ventura County Initial Study Guidelines, since the project is a "continuing industrial use with no substantial changes in land use incompatibility."

Because the project site is located within 300 feet of an agricultural operation, the applicant proposes to plant a vegetative screen consisting of an 18-foot-wide tree row along the northern and western boundaries of the project site adjacent to agricultural uses to comply with the Ventura County Agricultural/Urban Buffer Policy. This tree row will provide additional separation between the two uses and assist in minimizing fugitive dust from traveling onto or off the project site. In order to ensure that the accepted details of this plan are completed, a mitigation measure will be incorporated into the permit that identifies the Agricultural/Urban Buffer Policy standards. The tree row shall meet the minimum standards for vegetative screening as specified in Agricultural/Urban Buffer Policy: two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown. The trees and shrubs shall be vigorous, drought tolerant and at least six feet in height at the time of installation. Plants should have 50% to 70% porosity. The plant height should vary in order to capture pesticide drift within four feet of ground applications. A mature height of 15 feet or more is required for trees. To ensure adequate coverage, two staggered rows should be located five feet apart, 10 feet on center. The recommended plants include Toyon (*Heteromeles arbutifolia*), Sugarbush (*Rhus ovata*), Laurel Sumac (*Malosma laurina*) and Italian Cypress (*Cupressus sempervire*ns). (See Attachment 14.) As a mitigation measure, the Permittee will be required to submit a final landscape plan to the Planning Division to be reviewed and approved in consultation with the Agricultural Commissioner's Office prior to the issuance of a Zoning Clearance for Construction of the facility. The Permittee will be required to maintain the tree row/landscape buffer for as long as the wastewater treatment facility is in operation so that any potential adverse impacts on agricultural operations located within 300 feet of the facility are minimized.

The Agricultural Commissioner's Office also recommends a condition of approval to ensure that the proposed project has a less than significant impact on adjacent, off-site agricultural operations. The condition of approval would require the Permittee to provide a written schedule of days and hours of operation to landowners and operators in agricultural production located within 300 feet of the project site. With this information, the agricultural operators may plan chemical applications, use of heavy-duty farming equipment which may cause fugitive dust, and other farming actions during times of the day with the least conflict to both the proposed wastewater treatment facility and the off-site agricultural operation.

On June 13, 2018, the proposed project was presented to the Ventura County Agricultural Policy Advisory Committee (APAC). In summary, the APAC indicated that it recognizes the need for a wastewater treatment facility in Ventura County and encourages the

reinstatement of the permit with proper regulatory oversight and a reputable operator. In this regard, to help avoid the occurrence of another incident similar to the 2014 chemical explosion at the facility which negatively impacted agricultural resources, the APAC recommends that the applicant be prohibited from employing any of the supervisors or managers from the previous operations, SCWW and Green Compass. The Planning Division will take the APAC's recommendation into consideration.

Potentially significant adverse impacts have been identified but with the implementation of the below referenced mitigation measures, both project-specific and cumulative impacts related to land use incompatibility with adjacent agricultural uses and operations are less than significant.

5B-2. Ventura County General Plan Policy AG-2.1 states that discretionary development adjacent to agricultural designated lands shall not conflict with agricultural uses of those lands. The proposed project, due to the immediacy of adjacent agriculture and the non-agricultural nature of the project, presents a potential conflict with the nearby agricultural use. However, the applicant proposes to relocate existing facility processes and put new equipment and processes further from the agricultural lands, and to install a substantial vegetative screen at the boundary between the project site and the agricultural lands. These project designs, including the proposed conditions/mitigation measures outlined below, render the project impacts less than significant. The proposed project is consistent with the General Plan Goals and Policies of Item 5B of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): Potentially significant adverse impacts on agricultural operations have been identified but with the implementation of the following mitigation measures, impacts on adjacent agricultural operations will be less than significant:

Agricultural Resources, Land Use Incompatibility Mitigation Measures (M-1 through M-3)

(1) Vegetative Screen

Purpose: In order to minimize potential conflicts between agricultural operations within 300 feet of the project boundary and the permittee, said permittee must maintain a vegetative screen at the proposed project boundary.

Requirement: The permittee shall install and maintain a vegetative screen meeting the physical characteristics outlined in the Ventura County Agricultural Policy Advisory Committee *Agricultural/Urban Buffer Policy*. The Permittee shall retain a licensed landscape architect to prepare a landscape plan that complies with the requirements of this condition, the state Model Water Efficiency Landscape Ordinance (MWELO), Non-Coastal Zoning Ordinance section 8106-8.2.2, and the Ventura County Agricultural/Urban Buffer Policy.

Landscape Objectives: The Permittee must install and maintain a landscape buffer and vegetative screening that serves the following functions:

a. Provides additional separation between the wastewater treatment facility and the agricultural operations;

b. Assists in minimizing fugitive dust from traveling onto or off the project site; and,

c. Assists in minimizing fugitive pesticide spray from traveling onto the project site from the adjacent agricultural fields.

Landscape Design: The Permittee shall install a tree row along the northern and western boundaries of the project site which are adjacent to agricultural operations, that meets the minimum standards for vegetative screening as specified in the Agricultural Commissioner's Agricultural/Urban Buffer Policy standards and the general landscaping and water conservation requirements of the Non-Coastal Zoning Ordinance section 81.6-8.2 et seq. The tree row shall consist of:

a. Two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown;

b. Trees and shrubs that are vigorous, drought tolerant and at least six feet in height at the time of installation;

c. Plants that have 50% to 70% porosity;

d. Plant height that varies to capture pesticide drift within four feet of ground applications. A mature height of 15 feet or more is required for trees;

e. Adequate coverage, including two staggered rows located five feet apart, 10 feet on center; and,

f. The following recommended plants: Toyon (*Heteromeles arbutifolia*), Sugarbush (*Rhus ovata*), Laurel Sumac (*Malosma laurina*) and Italian Cypress (*Cupressus sempervire*ns).

Documentation: The Permittee shall submit three sets of a landscape plan to the Planning Division for review and approval, in consultation with the Agricultural Commissioner's Office. A California registered landscape architect (or other qualified individual as approved by the Planning Director) shall prepare the landscape plan, demonstrating compliance with the requirements set forth in this condition (above). The landscape architect responsible for the work shall stamp the plan. The landscape plans shall be submitted to the Building and Safety Division for plan check and issuance of a Building Permit prior to installation. After landscape installation, the Permittee shall submit to Planning Division staff a statement from the project landscape architect that the Permittee installed all landscaping as shown on the approved landscape plan. Any changes to the landscape plans that affect the character or quantity of the plant material

or irrigation system design shall be approved by the Planning Director in consultation with the Agricultural Commissioner's Office.

Timing: The Permittee shall submit the landscape plan to the Planning Division for review and approval, in consultation with the Agricultural Commissioner's Office, prior to issuance of a Zoning Clearance for Construction. After the issuance of a Zoning Clearance for Construction, the Permittee shall submit the landscape plans to the Building and Safety Division for plan check review and issuance of a Building Permit for the proposed landscaping. All landscaping shall be installed prior to the issuance of a Zoning Clearance for Use Inauguration and prior to renewed operations of the facility.

Monitoring and Reporting: Landscaping monitoring activities shall occur according to the requirements set forth in the Non-Coastal Zoning Ordinance section 8106-8.2.8. The Planning Division maintains the landscape plans and statement by the landscape architect in the Project file. The Planning Division and the Agricultural Commissioner's Office have the authority to conduct site inspections consistent with the requirements of NCZO section 8114-3. to ensure that the Permittee installs and maintains the landscaping in accordance with the approved landscape plan, the requirements of this condition, the landscape regulations of the Non-Coastal Zoning Ordinance, MWELO, and the Agricultural/Urban Buffer Policy. The Agricultural Commissioner's Office will notify the Planning Division of any reports of the permittee's failure to comply with this condition.

(2) Control of Fugitive Dust

Purpose: In order to minimize potential conflicts between the proposed project and adjacent and nearby agricultural operations the permittee must minimize emanation of fugitive dust from the proposed project.

Requirement: The permittee shall keep emanations of fugitive dust from the proposed project at an absolute minimum. At a minimum, dust-producing activities shall be halted during high winds and unpaved areas prone to creating dust will be periodically monitored and controlled to minimize fugitive dust.

Documentation: No documentation is needed.

Timing: The permittee shall respond immediately to any complaint from agricultural operators within 300 feet of the project boundary and implement the best remedy to the problem.

Monitoring: The Ventura County Agricultural Commissioner's Office will monitor complaints from adjacent and nearby agricultural operators of dust emanating from the project and report to the Planning Division any failures to comply with this condition.

(3) Notification and Response Plan

Purpose: In order to minimize potential conflicts between agricultural operations within 300 feet of the project boundary and the permittee, said permittee must notify persons associated with the proposed project (associated persons) of agricultural activities within 300 ft of the project boundary.

Requirement: Prior to use inauguration of the requested Zoning Clearance, the permittee is required to prepare a Notification and Response Plan, subject to approval by Ventura County Agricultural Commissioner's Office (VCAC). The plan must indicate how associated persons are to be notified that normal farming operations may cause nuisances such as dust or noise, and that the use of fertilizers and/or chemical pest controls may occur in the vicinity. The plan must indicate how associated persons will be instructed to respond in the rare event that adjacent agricultural operations present a hazard to said persons. The permittee is recommended to contact adjacent growers to exchange information about agricultural operations that may be scheduled and make this information available to associated persons.

Documentation: The permittee shall maintain a record that all associated persons notified have received the information outlined in the Notification and Response Plan.

Timing: Notice shall be provided to associated persons prior to associated persons entering the proposed project boundary.

Monitoring: The permittee shall provide the VCAC with any proposed changes to the Notification and Response Plan for approval. The Ventura County Agricultural Commissioner's Office will keep record of the provided notices and report to the Planning Division any reports of failure to comply with this condition.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
6. Scenic Resources (Plng.)								
Will the proposed project:								
a) Be located within an area that has a scenic resource that is visible from a public viewing location, and physically alter the scenic resource either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?		X				X		
b) Be located within an area that has a scenic resource that is visible from a public viewing location, and substantially obstruct, degrade, or obscure the scenic vista, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?		X				X		
c) Be consistent with the applicable General Plan Goals and Policies for Item 6 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
6a. and 6b. The proposed project is not located within a mapped Scenic Resource Protection Overlay zone but is within the vicinity of an Eligible County Scenic Highway (not officially designated), SR 126. SR 126 is located approximately 0.3 miles north of the project site. The modified CUP would 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. (See Attachment 14.) Landscaping will be located within the new parking lot area, adjacent to the proposed office building, and along the perimeter of the project site. Pursuant to a condition of approval, all proposed landscaping will be installed prior to the issuance of a Zoning Clearance for Use Inauguration of the facility. With the installation of landscape screening along the northern, eastern and western property boundaries as part of the proposed project, public views from SR 126 will not be altered or obscured. The installation of landscaping will improve the visual character of the area.

Thus, the proposed project will have a less than significant project-specific impact and will not make a cumulatively considerable contribution to significant cumulative impacts, related to scenic resources.

6c. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 6 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
7. Paleontological Resources								
Will the proposed project:								
a) For the area of the property that is disturbed by or during the construction of the proposed project, result in a direct or indirect impact to areas of paleontological significance?		X				X		
b) Contribute to the progressive loss of exposed rock in Ventura County that can be studied and prospected for fossil remains?		X				X		
c) Be consistent with the applicable General Plan Goals and Policies for Item 7 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

7a. and 7.b. Based on Planning Division GIS Data Layer Maps, the project site is located in an area with "undetermined" paleontological significance and, therefore, unlikely to contain any significant paleontological resources. Minor ground disturbance activities, i.e., installation of impervious surface and landscaping, will occur within an area that has previously been graded for the construction of the existing facility. Undisturbed paleontological materials are not anticipated to be found. In any case, future grading and construction activities will be subject to the Planning Division's standard condition of approval regarding the discovery of previously unknown subsurface resources. With the implementation of this condition, any potential impacts to resources discovered during ground disturbance activities will be avoided.

Thus, the proposed project will have a less than significant project-specific impact, and will not make a cumulatively considerable contribution to significant cumulative impacts, related to paleontological resources.

7c. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 7 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts will be less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
8A. Cultural Resources – Archaeological								
Will the proposed project:								
1) Demolish or materially alter in an adverse manner those physical characteristics that account for the inclusion of the resource in a local register of historical resources pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the Public Resources Code?		X				X		
2) Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for the purposes of CEQA?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 8A of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
8A-1. and 8A-2. The project site has been previously graded for construction of the existing facility. According to Planning Division GIS Data Layer Maps, no known archeological resources exist on the site, nor is the project site located within a sensitive or very sensitive archeological resource area. Although it is unlikely that the proposed minor ground disturbance activities, i.e., installation of impervious surface and landscaping, will reveal the presence of subsurface archeological resources, there is a potential that these resources exist on the site. Therefore, any future grading and construction activities will be subject to the Planning Division's standard condition of approval regarding the discovery of previously unknown subsurface archeological resources. With the implementation of this condition, any potential impacts on resources discovered during ground disturbance activities will be avoided. Thus, the proposed project will have a less than significant project-specific impact, and will not make a cumulatively considerable contribution to significant cumulative impacts, related to archeological resources.

Pursuant to Public Resources Code (PRC) section 21080.3.1 et seq., a formal notification of determination of project completeness and notification of consultation opportunity was provided to the Barbareno – Ventureno Mission Indians on September 21, 2017, when the original reinstatement and modification application was submitted to the County. To date, the Barbareno – Ventureno Mission Indians have not provided a response to the Planning Division in regard to this project.

8A-3. The proposed project is consistent with the General Plan Goals and Policies for Item 8A of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
8B. Cultural Resources – Historic (Plng.)								
Will the proposed project:								
1) Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources?		X				X		

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code?		X				X		
3) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA?		X				X		
4) Demolish, relocate, or alter an historical resource such that the significance of the historical resource will be impaired [Public Resources Code, Sec. 5020(q)]?		X				X		

Impact Discussion:
8B-1. through 8B-3. The Planning Division Cultural Heritage staff planner reviewed the proposed project and determined that the property is not a designated cultural heritage site. The property is in proximity to an area eligible for an historic resource district designation, however, the project property itself (as well as the other properties zoned M-3 (General Industrial) in the Mission Rock Road area) was found to be a non-contributor to the eligible district as shown on Map 7 in the appendices of the *Ventura County Cultural Heritage Survey Phase V: Western Santa Clara Valley (July 1996)*.

Although the property was not found to be a contributor to the eligible district, the wastewater treatment facility may be eligible for County Landmark designation for its association with post World War II development and suburbanization of southern California (Criterion 2 – Events, Secretary of Interior Standards). The facility had been in operation as a wastewater treatment plant, and owned by the same operator, since 1960, prior to the suspension of the CUP in November 2014. The facility retains its integrity of workmanship, setting, location, feeling, and design. Since the proposed project includes the request to continue the existing wastewater treatment facility for an additional 20-year period, and does not involve the demolition, relocation or change of use of the existing facility, project impacts on potential historic resources will be less than significant.

Thus, the proposed project will have a less than significant project-specific impact, and will not make a cumulatively considerable contribution to significant cumulative impacts, related to potential historic resources.

8B-4. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 8B of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
9. Coastal Beaches and Sand Dunes								
Will the proposed project:								
a) Cause a direct or indirect adverse physical change to a coastal beach or sand dune, which is inconsistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, Ventura County Coastal Area Plan, or the Ventura County General Plan Goals, Policies and Programs?	X				X			
b) When considered together with one or more recently approved, current, and reasonably foreseeable probable future projects, result in a direct or indirect, adverse physical change to a coastal beach or sand dune?					X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 9 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
9a. and 9b. The project site is located many miles from the coast and does not have the potential to affect coastal resources such as beaches or sand dunes. Thus, there are no impacts on Coastal Beaches and Sand Dunes.

9c. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 9 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation is required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
10. Fault Rupture Hazard (PWA)								
Will the proposed project:								
a) Be at risk with respect to fault rupture in its location within a State of California designated Alquist-Priolo Special Fault Study Zone?	X							
b) Be at risk with respect to fault rupture in its location within a County of Ventura designated Fault Hazard Area?	X							
c) Be consistent with the applicable General Plan Goals and Policies for Item 10 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

10a. and 10b. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements. There are no known active or potentially active faults extending through the proposed project based on State of California Earthquake Fault Zones in accordance with the Alquist-Priolo Earthquake Fault Zone Act, and Ventura County General Plan Hazards Appendix – Figure 2.2.3b. Furthermore, no habitable structures are proposed within 50 feet of a mapped trace of an active fault. Therefore, the proposed project is expected to have no impact from potential fault rupture hazard.

There is no known cumulative fault rupture hazard impact that will occur as a result of other approved, proposed, or probable projects.

10c. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 10 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
11. Ground Shaking Hazard (PWA)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) Be built in accordance with all applicable requirements of the Ventura County Building Code?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 11 of the Initial Study Assessment Guidelines?					X			

Impact Discussion:

11a. The project site will be subject to moderate to strong ground shaking from seismic events on local and regional fault systems. The County of Ventura Building Code adopted from the California Building Code, dated 2016, Chapter 16, § 1613 requires structures to be designed to withstand this ground shaking. The Report of Geotechnical Investigation, prepared by Arroyo Geotechnical, dated June 26, 2007, provides the structural seismic design criteria for the proposed project and will be required to be updated to the Building Code and seismic design criteria in effect at the time of building permit issuance. The requirements of the Building Code will reduce the effects of ground shaking to less than significant.

The hazards from ground shaking will affect each project individually; and no cumulative ground shaking hazard will occur as a result of other approved, proposed, or probable projects.

11b. The proposed project is consistent with applicable General Plan Goals and Policies for Item 11 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
12. Liquefaction Hazards (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving liquefaction because it is located within a Seismic Hazards Zone?		X						

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
b) Be consistent with the applicable General Plan Goals and Policies for Item 12 of the Initial Study Assessment Guidelines?		X			X			

Impact Discussion:

12a. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements. The project site is located within a potential liquefaction hazard area. The Geotechnical Engineering Report, prepared by Arroyo Geotechnical, dated June 26, 2007, included a site-specific liquefaction analysis and evaluation. The results of this report (Page 7) indicate that continuous liquefied layers are not anticipated to exist on the site. In this regard, the potential hazard from liquefaction is considered to be less than significant.

The hazards from liquefaction will affect each project individually; and no cumulative liquefaction hazard will occur as a result of other approved, proposed, or probable projects.

12b. The proposed project is consistent with the General Plan Goals and Policies for Item 12 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. The impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
13. Seiche and Tsunami Hazards (PWA)								
Will the proposed project:								
a) Be located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir?	X							
b) Be located in a mapped area of tsunami hazard as shown on the County General Plan maps?	X							
c) Be consistent with the applicable General Plan Goals and Policies for Item 13 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
13a. and 13b. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements. The project site is not located adjacent to a closed or restricted body of water based on aerial imagery review (photos dated December 2019, aerial imagery is under the copyrights of Pictometry, Source: Pictometry©, 2019) and is not subject to seiche hazard. The project is also not mapped within a tsunami inundation zone based on the 2040 Ventura County General Plan Background Report, Section 11.2, Figure 11-9 and therefore, there is no impact from potential hazards from tsunami.

The hazards from seiche and tsunami will affect each project individually; and no cumulative seiche and tsunami hazard will occur as a result of other approved, proposed, or probable projects.

13c. No impacts due to seiche or tsunamis have been identified and, thus, the project is consistent with the applicable General Plan Goals and Policies for Item 13 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
14. Landslide/Mudflow Hazard (PWA)								
Will the proposed project:								
a) Result in a landslide/mudflow hazard, as determined by the Public Works Agency Certified Engineering Geologist, based on the location of the site or project within, or outside of mapped landslides, potential earthquake induced landslide zones, and geomorphology of hillside terrain?	X							
b) Be consistent with the applicable General Plan Goals and Policies for Item 14 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
14a. The project site is not located in a mapped landslide, not located within a hillside area, and is not located in a potential seismically induced landslide zone, based on analysis conducted by the California Geological Survey as part of California Seismic Hazards Mapping Act, 1991, PRC sections 2690-2699.6. Additionally, the project does

not include any excavations into a hillside. Thus, there are no impacts to the project resulting from landslide hazard.

The hazards from landslides/mudslides will affect each project individually; and no cumulative landslide/mudslide hazard will occur as a result of other approved, proposed, or probable projects.

14b. There are no impacts to the project resulting from landslide hazard. Thus, the project is consistent with the applicable General Plan Goals and Policies for Item 14 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
15. Expansive Soils Hazards (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving soil expansion because it is located within a soils expansive hazard zone or where soils with an expansion index greater than 20 are present?	X							
b) Be consistent with the applicable General Plan Goals and Policies for Item 15 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

15a. Future development at the project site will be subject to the requirements of the County of Ventura Building Code adopted from the California Building Code, in effect at the time of construction that requires mitigation of potential adverse effects on expansive soils. There is no impact from potential hazards from expansive soils.

The hazards from expansive soils will affect each project individually; and no cumulative expansive soils hazard will occur as a result of other approved, proposed, or probable projects.

15b. There are no impacts on the project from potential hazards from expansive soils. Thus, the proposed project is consistent with the applicable General Plan Goals and Policies for Item 15 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
16. Subsidence Hazard (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving subsidence because it is located within a subsidence hazard zone?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 16 of the Initial Study Assessment Guidelines?		X			X			

Impact Discussion:

16a. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements. This project is located within an area subject to probable subsidence. A subsidence hazard to an area may be caused by the removal of oil (and/or water) such that the overburden load that the liquid used to support is placed on the rock or sediment structure and this material becomes compressed producing a net loss in volume and a depression in the land surface. The proposed project is not for groundwater or oil extraction and the effects of the project on subsidence are less than significant.

16b. The effects of the project on subsidence are less than significant and, thus, the proposed project is consistent with the applicable General Plan Goals and Policies for Item 16 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
17a. Hydraulic Hazards – Non-FEMA (PWA)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Result in a potential erosion/siltation hazard and flooding hazard pursuant to any of the following documents (individually, collectively, or in combination with one another): • 2007 Ventura County Building Code Ordinance No.4369 • Ventura County Land Development Manual • Ventura County Subdivision Ordinance • Ventura County Coastal Zoning Ordinance • Ventura County Non-Coastal Zoning Ordinance • Ventura County Standard Land Development Specifications • Ventura County Road Standards • Ventura County Watershed Protection District Hydrology Manual • County of Ventura Stormwater Quality Ordinance, Ordinance No. 4142 • Ventura County Hillside Erosion Control Ordinance, Ordinance No. 3539 and Ordinance No. 3683 • Ventura County Municipal Storm Water NPDES Permit • State General Construction Permit • State General Industrial Permit • National Pollutant Discharge Elimination System (NPDES)?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 17A of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

17A-1. There is not a substantial increase in impervious area proposed from the amount of impervious surface authorized under Major Modification LU06-0011. Major Modification LU06-0011 authorized 172,412-sq. ft. of impervious surface area within the current permit boundaries. Within the requested 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, 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 within the current permit boundary and the expansion area will be 135,753-sq. ft. The site plan indicates the area will be bermed to prevent stormwater runoff. The increase in runoff from the pre-project condition to the post-project condition will be retained on site with no new drainage facilities constructed. No increase in flooding hazards or potential for erosion or siltation will occur as a result of the proposed project and, thus, the impacts will be less than significant.

17A-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 17 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	**Project Impact Degree Of Effect****				**Cumulative Impact Degree Of Effect****			
	N	LS	PS-M	PS	N	LS	PS-M	PS
17b. Hydraulic Hazards – FEMA (WPD)								
Will the proposed project:								
1) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Unshaded' flood zone (beyond the 0.2% annual chance floodplain: beyond the 500-year floodplain)?		X				X		
2) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Shaded' flood zone (within the 0.2% annual chance floodplain: within the 500-year floodplain)?		X				X		
3) Be located, in part or in whole, within the boundaries of a Special Flood Hazard Area (1% annual chance floodplain: 100-year), but located entirely outside of the boundaries of the Regulatory Floodway?		X				X		
4) Be located, in part or in whole, within the boundaries of the Regulatory Floodway, as determined using the 'Effective' and latest available DFIRMs provided by FEMA?		X				X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 17B of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
17B-1. Through 17B-4. The Ventura County Public Works Agency (PWA), Watershed Protection District, Watershed Planning and Permits Division, reviewed the proposed project and determined that the project site is located in an area identified by the Federal Emergency Management Agency (FEMA) as an area of Special Flood Hazard (SFHA) Zone AE, as evidenced on FEMA Map Panel 06111C0778F (as of July 31, 2020). For this reason, the project must be in compliance with the County of Ventura Floodplain Development Ordinance, which provides minimum standards for development within the SFHA. The specific conditions of development will be determined during the floodplain development permit process. The proposed project, with implementation of the recommended conditions, is therefore deemed less than significant for FEMA-related hydraulic hazards.

17B-5. With the implementation of the recommended conditions of approval, the project is consistent with the applicable General Plan Goals and Policies for Item 17B of the Initial Study Assessment Guidelines

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
18. Fire Hazards (VCFPD)								
Will the proposed project:								
a) Be located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 18 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
18a. The project site is not located in a High Fire Hazard Area/Fire Severity Zone or Hazardous Watershed Fire Area as indicated by the VCFPD. The proposed development will be required to comply with all applicable federal, state, and local fire code regulations and the requirements of the Ventura County Building Code. Thus, no impacts related to fire hazards are anticipated as a result of the proposed project.

18b. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 18 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
19. Aviation Hazards (Airports)								
Will the proposed project:								
a) Comply with the County's Airport Comprehensive Land Use Plan and pre-established federal criteria set forth in Federal Aviation Regulation Part 77 (Obstruction Standards)?	X				X			
b) Will the proposed project result in residential development, a church, a school, or high commercial business located within a sphere of influence of a County airport?	X				X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 19 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
19a. and 19b. The proposed project is not located within a sphere of influence of a County-operated airport and will not involve residential development, a church, a school or a high-rise commercial business. Thus, no impacts on aviation hazards are anticipated as a result of the proposed project.

19c. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 19 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
20a. Hazardous Materials/Waste – Materials (EHD/Fire)								
Will the proposed project:								
1) Utilize hazardous materials in compliance with applicable state and local requirements as set forth in Section 20a of the Initial Study Assessment Guidelines?			X			X		

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2) Be consistent with the applicable General Plan Goals and Policies for Item 20a of the Initial Study Assessment Guidelines?			X			X		

Impact Discussion:

20A-1. According to Section 20(a) of the Ventura County Initial Study Assessment Guidelines, hazardous materials mean any material that, because of its quantity, concentration, physical or chemical characteristics poses a significant threat or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that the regulatory agency (EHD, Certified Unified Program Agency (CUPA)) determines to be potentially injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

The proposed project involves the continued operation of a wastewater treatment facility that includes the storage, use, and on-site transportation of hazardous materials. The hazardous materials proposed to be stored, handled, and transported onsite are expected to include:

Name of Material	Physical State	DOT Hazard Class	IBC/IFC Hazard Class	Largest Container	Maximum Quantity
Diesel Fuel	Liquid	Combustible Liquid	Class II Combustible Liquid	500 gallons	500 gallons
Motor Oil	Liquid	Combustible Liquid	Class IIIB Combustible Liquid	55 gallons	110 gallons
Hydraulic Oil	Liquid	Not Regulated	Class IIIB Combustible Liquid	5 gallons	80 gallons
Transmission Oil	Liquid	Not Regulated	Class IIIB Combustible Liquid	5 gallons	80 gallons
Acetylene	Compressed Gas	Flammable Gas	Flammable Gas	80 ft3	80 ft3
Oxygen	Compressed Gas – Liquid State	Non-Flammable Gas Oxidizer	Oxidizer	1,000 gallons	1,000 gallons
Argon	Compressed Gas	Non-Flammable Gas	Compressed Gas	80 ft3	960 ft3
Sulfuric Acid	Liquid	Corrosive Liquid	Corrosive	5,050 gallons	6.040 gallons
Hydrogen Peroxide	Liquid	Oxidizer	Corrosive	330 gallons	990 gallons

Name of Material	Physical State	DOT Hazard Class	IBC/IFC Hazard Class	Largest Container	Maximum Quantity
		Corrosive Liquid			
Emulsion Breaker	Liquid	Flammable Liquid	Class IA Flammable Liquid	250 gallons	250 gallons
Ferric Chloride	Liquid	Corrosive Liquid	Corrosive	330 gallons	660 gallons
Sodium Hydroxide	Liquid / Solid	Corrosive	Corrosive	330 gallons 60 pounds	990 gallons 480 pounds
Aluminum Sulfate	Liquid	Corrosive	Corrosive	330 gallons	660 gallons
Polymers	Liquid / Solid	Not Regulated	Not Regulated	330 gallons	990 gallons
Sodium Hypochlorite (bleach)	Liquid	Corrosive	Corrosive Oxidizer	330 gallons	990 gallons

The improper storage, handling, and disposal of these materials could result in the creation of adverse impacts on the environment and on human health and safety. Because the facility will store, handle, and transport hazardous materials, and because of the 2014 fire and explosion that occurred on the project site which caused acute injury to humans and destroyed property, the Planning Division contracted with an environmental consultant, Dr. Daniel Tormey, of Catalyst Environmental Solutions,[39] for peer review of the applicant's application materials and supporting documents and plans (e.g., Operations and Maintenance Plan, Odor Minimization Plan, Dust Control Plan, and SPCC Plan) to evaluate and determine whether the proposed project includes operating measures and controls to address the potential risks of another explosion, fire, or any other hazardous condition or incident at the proposed wastewater treatment facility. After reviewing the applicant's application, Dr. Tormey provided staff with a Technical Memorandum (Attachment 29), dated September 6, 2018, recommending that a Risk Management Analysis (RMA) and a Pipeline Integrity Test for the existing 12-mile sewer discharge line that leads to the City of Oxnard's wastewater treatment plant be prepared by the applicant to fully address any potential safety and environmental hazards that could arise from the continued operation of the community wastewater treatment facility. The pipeline test is no longer a recommendation for this project since the use of the sewer pipeline has been eliminated from the project description. The applicant hired Ensafe, Inc. to prepare an RMA. (See Attachment 7.) As explained previously in Section A.7., above, the RMA was conducted utilizing the PHA methodology. The PHA included review of the proposed wastewater treatment processes and ancillary processes (including the loading,

[39] Catalyst Environmental Solutions Corporation is a full-service environmental consulting firm specializing in the energy sector, land development and remediation, and water resources.

unloading, storage and on-site chemical transport) at the project site. The PHA methodology included determination of multiple hazard scenarios. For each 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. The PHA team identified nine recommendations to improve the safety of the facility by reducing the risks of hazards:

- 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 (1) prohibit receipt of wastes in totes or drums and (2) prohibit pumping of drums or totes into any vacuum truck;
- Implementation of a New Chemical introduction/procurement policy;
- Establishment of program to familiarize local emergency responders with site operations and hazards;
- Posting of appropriate hazard warning signage at hazardous materials storage building; and,
- Posting of appropriate informational signage at truck unloading area to identify unloading valves/piping.

Dr. Tormey concurs with the recommendations included in the RMA and proposes that the specific actions recommended by Ensafe, as well as actions identified in Dr. Tormey's September 6, 2018 Technical Memoranda be implemented in a series of plans and incorporated as mitigation measures/conditions of approval of the project. The series of plans would include the following: (1) Risk Management Plan; (2) Training Plan; (3) Operating and Maintenance Plan; and (4) Annual Spill Drill Plan. Below is an annotated outline of each of the required plans and the necessary elements for each plan. These plans (as well as all the recommended mitigation measures/conditions of approval) will be reviewed at least once every three years through the County's standard Condition Compliance Program to verify the operator successfully implements the plans (and project conditions) as approved by the decision-making body. In addition to the standard tri-annual condition compliance review, the Permittee will be required to advise the Planning Division of any changes to the operation of the wastewater facility due to local, state, or federal regulatory requirement changes and any operator-initiated changes by submitting a "tracking sheet" to document the changes throughout the life of the permit. Prior to the Permittee's implementation of any changes to the facility, the revised plans/operations shall be reviewed and approved by the Planning Division, EHD, and, if necessary, VCFPD.

Risk Management Plan

The Permittee shall prepare a Risk Management Plan to supplement the January 2017 O&M Manual. The O&M Manual focuses on the treatment system. The Risk Management Plan would consider facility operations as a whole. The following elements would be included in the Risk Management Plan:

1. Results of the design optimization of the chemical feed areas to minimize opportunities for vehicle collisions. This element was recommended by Ensafe and focuses on the facility operations outside of the treatment system. The presentation would include elements considered in the design optimization, how these elements were addressed in the modified design, and identification of controls (e.g. signs, barricades, other controls). The modified design with controls would also be indicated on the site plan.

2. Design and construction of a hazardous material storage building that is compliant with local and state chemical storage and fire protection standards. This element was recommended by Ensafe and focuses on the area of hazardous materials storage. The design would include specification of the regulatory standards and guidance relied upon, and a determination of how the storage building would comply with these standards.

3. Establishment of designated paths to the hazardous materials storage building for delivery trucks. This element was recommended by Ensafe and reflects that the current paths for delivery trucks to the hazardous materials storage building could have collisions.

4. With the removal of the use of the existing 12-mile sewer discharge pipeline connected to the City of Oxnard's Waste Water Treatment Plant, the applicant modified the on-site traffic flow of the property and included back-hauling of wastewater to appropriate disposal facilities. This change led to the development of an On-Site Traffic and Queuing Plan which was reviewed by the County's environmental consultant, Dr. Tormey. As a result of Dr. Tormey's review, the On-Site Traffic and Queuing Plan was modified as described in the project description. In addition, the applicant retained EnSafe to review the changed plans in light of their earlier study, and to make recommendations if needed. The resulting On-Site Traffic and Queuing Plan is provided in Attachment 13. With respect to delivery of hazardous materials to the facility, no other deliveries or traffic will be allowed on site during delivery.

5. Posting of appropriate hazard warning signage at the hazardous materials storage building. This element was recommended by Ensafe. The signage can be identified as part of the element on design and construction of the hazardous materials storage building.

6. Posting of appropriate informational signage at the truck unloading area to identify unloading valves and piping. This element was recommended by Ensafe. This Plan shall provide a map of valves and piping at the truck unloading area to identify the type of informational signage to help minimize the potential for unloading to the incorrect valve or pipeline.

7. Use of double-walled tubing for chemical transfers. This element was recommended by Ensafe. This Plan shall include a modified site plan identifying those chemical transfer areas that would have double-walled tubing.

8. Consistent identification and tracking of the potential for chemical incompatibilities. The facility explosion in November 2014 was caused by a chemical incompatibility that was not adequately identified, and that had inadequate controls to prevent from occurring. The Risk Management Plan shall include a clear protocol for identifying the potential for chemical incompatibilities in any chemical accepted, used or handled at the facility. The protocol shall include requirements for the following:

    a. Profiling of chemicals accepted, used, or handled at the facility. The profiling shall include both accepted waste streams, and any other treatment chemicals stored or used at the facility. Profiling shall include identification of chemicals that otherwise may only be indicated by a trade name by the chemical supplier.

    b. Use of chemical incompatibility charts and references to identify the potential adverse effects from mixing of chemicals on the facility.

    c. For those chemical incompatibilities that may lead to adverse effects, the Risk Management Plan shall identify a hierarchy of controls to ensure incompatible chemicals are not mixed.

Chemical Incompatibility Training Plan
The Permittee shall prepare a Chemical Incompatibility Training Plan to supplement the Safety Handbook. The following elements would be included in the Training Plan:

1. Establishment of policies that (1) prohibit receipt of wastes in totes or drums and (2) prohibit pumping of drums or totes (either waste totes/drums or product totes/drums) into any vacuum truck. This Plan element was recommended by Ensafe and focuses on the root cause of the November 2014 explosion at the facility. The employee training shall include procedures for identification of improper containers, and specific procedures to ensure that material in totes or drums is not introduced into vacuum trucks.

2. Implementation of a New Chemical introduction and procurement policy. This element was recommended by Ensafe. The policy would, at a minimum, include the elements described in Item 7 of the Risk Management Plan ("Consistent identification and tracking of the potential for chemical incompatibilities"). The policy and the procedures and controls for consistent identification and tracking of the potential for chemical incompatibilities would be clearly and thoroughly described in the Training Plan.

Annual Tabletop Response Drill
The first responders of the November 2014 fire and explosion at the facility were not adequately informed about the risks posed by the chemicals stored onsite and the safe abating of hazardous conditions in light of the chemical incompatibilities that resulted from the event. The Permittee shall provide for an annual Tabletop Response Drill at the facility for first responders. The drill will be conducted onsite and consider accident conditions that would lead to responders coming to the facility. The drill will identify the roles and responsibilities of facility personnel, response personnel, and identify an Incident Command Structure. The outline of the drill will be reviewed and approved by the County. This drill element was also recommended by Ensafe as "establishment of a program to familiarize local emergency responders with site operations and hazards".

Implementation of the above referenced plans will reduce the potentially significant project-specific impacts to a level of less than significant as it relates to the storage, handling and transfer of hazardous materials. (Refer to Mitigation/Residual Impact(s) below in Item 20(a) for the list of mitigation measures for this impact area).

Operations and Maintenance Manual
As part of the application, the applicant submitted a draft O&M Manual (see Attachment 19), prepared by Ensafe, Inc., dated January 2017, as required, in part, to meet regulatory requirements promulgated by the EPA at Title 40 CFR 437 for The Centralized Waste Treatment Point Source Category, Subpart D – Multiple Wastestream, for the proposed wastewater treatment facility. Specifically, the O&M Manual is developed and must be maintained onsite to meet the requirements for Onsite Compliance Paperwork as defined at Title 40 CFR 437.41(b), in support of initial and periodic certification statements for pretreatment. The draft O&M Manual has thus been prepared to describe and document the procedures to be followed to ensure that the pretreatment systems are well operated and maintained, and where applicable why these adopted procedures ensure compliance. The draft O&M Manual is intended to provide the following:

1. Guidance for wastewater technicians operating the pretreatment system and to be a training tool for all employees at the facility. The draft O&M Manual is a dynamic document, which will be updated as necessary to reflect any future changes to the system layout, operations, or other changes at the facility.

2. Process descriptions, general guidelines for process operations, sampling and testing, personnel responsibilities, record keeping, system maintenance, and emergency operation.

The Permittee will be required, as a condition of approval, to submit a final O&M Manual to the Planning Division for review and approval prior to the issuance of a Zoning Clearance for Construction of the facility. With the implementation of this mitigation measure, the proposed project will have a less than significant project-specific impact as it related to on-site hazards and hazardous materials.

Hazardous Material Business Plan
According to the County's records, a Hazardous Materials Business Plan (HMBP) for reportable hazardous materials was electronically submitted to the California Environmental Reporting System (CERS) on May 23, 2017 (CERS I.D. No. 10331929) by the previous operator, SCWW. (Section A.10, Table A, above). The applicant does not currently have an active permit to operate issued by EHD/CUPA. To ensure a current and accurate inventory of hazardous materials is available for emergency responders in the event of an incident or emergency, the new operator will be required, as a condition of approval, to submit an HMBP to CERS prior to the issuance of a Zoning Clearance for Use Inauguration, annually on or before March 1st, and as often as is necessary in order to update the list of reportable hazardous materials in accordance with CA HSC, Chapter 6.95, § 25508.

The HMBP must include detailed information on the inventory of hazardous materials at the facility, emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material, training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material, and a site map that contains loading areas, internal roads, adjacent streets, storm and sewer drains, access and exit points, emergency shut-offs, evacuation staging areas, hazardous material handling and storage areas, and emergency response equipment. The HMBP is necessary in order to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment. With the implementation of this condition of approval, the proposed project will have a less than significant project-specific impact as it relates to hazardous materials.

California Health and Safety Codes
The new operator will also be required, as a condition of approval, to operate the facility in compliance with applicable state and local regulations (i.e., CCR, Title 22, CA HSC, Chapter 6.95 and Ventura County Ordinance Code) pertaining to the safe storage, handling, and off-site disposal of potentially hazardous materials so that any potential project-specific impacts are reduced to a level of less than significant. CA HSC Chapter 6.5 and CCR, Title 22, Division 4.5, Environmental Health Standards for the Management

of Hazardous Waste, establishes definitions and management requirements related to hazardous waste identification, transportation, treatment and disposal, and tracking and record keeping. Some requirements include “cradle-to-grave” manifesting (tracking of the waste from generation to final disposal), proper labeling, and safe storage of hazardous waste. Generators, transporters, and disposal facilities are required to obtain an identification number. This number identifies each handler on hazardous waste manifests and other paperwork. The identification number enables regulators to track the waste from origin to final disposal and are site specific. CA HSC Chapter 6.95 and CCR, Title 19 (Division 2, Chapter 4), Hazardous Materials Release Response Plans and Inventory, establishes the requirement for businesses to create and maintain HMBPs, establishes the statewide environmental reporting systems for submittal of HMBPs, describes the requirements for the HMBPs such as hazardous materials inventory, and describes procedures for the CUPA to respond to violations of the HMBP requirements. With the implementation of this condition of approval, the proposed project will have a less than significant project-specific impact as it relates to hazardous materials.

Fire Code Permits

The operation of a wastewater treatment facility is subject to the requirements of the Uniform Fire Code as adopted and amended by the Ventura County Fire Code Ordinance. As a condition of approval, the Permittee will be required to obtain a Fire Code permit prior to the storage, usage or handling of any hazardous materials, prior to the issuance of a Zoning Clearance for Use Inauguration, including prior to conducting processes which produce conditions hazardous to life or property, and prior to installation of equipment used in the connection with such activities, including emergency generators with “day tanks” greater than 60 gallons (defined below). Fire Code permit requirements include, but are not limited to, the following: incompatible materials shall be stored separate from each other and not stored within the same hazardous material cabinet or containment area; maintain all required secondary containment areas, curbs, and dikes; maintain legible and visible hazardous material warning signs, placards, and labels; immediately notify the VCFPD and EHD of any spills of hazardous materials and injuries resulting from the storage and use of hazardous materials; and, notify the VCFPD prior to increasing the amount or the addition of any hazardous material. The intent of the Fire Code permit is to assist in providing a reasonable degree of protection for life and property from the hazards created by fire and explosion. In addition to obtaining a Fire Code permit, the Permittee will be required to install fire extinguishers and obtain a VCFPD Form 126 (Fire Requirements for Construction Application) which specifies the rate and availability of fire flow, size and location of fire hydrants, and water supply for a subject property to determine if the proposed construction will meet the current standards of the VCFPD Ordinances 29 and 30. This form is required by the VCFPD for any proposed construction prior to the issuance of any building permits in unincorporated Ventura County. With the implementation of these conditions of approval, the proposed project will have a less than significant project-specific impact as it relates to hazardous materials. (Refer to Section A.10, Table A, above).

As part of the project design, the applicant proposes to install a 610-sq. ft. metal, hazardous materials storage building atop an existing concrete pad (see Attachments 11 and 12) that is designed to separately store incompatible hazardous materials from each other to avoid potential hazardous incidents. This element was also recommended by Ensafe (See No. 2 of the Risk Management Plan above). Prior to the construction of the hazardous materials storage building, the Ventura County Building and Safety Division and the VCFPD will review the plans to ensure the structure is designed and constructed in compliance with applicable chemical storage and fire protection standards and regulations. When not stored in the hazardous materials storage building, the applicant will store hazardous materials used during the wastewater treatment processes near the point of use in "day tanks" which will be placed on top of spill containment trays. These tanks will be hard-piped into the process equipment. The "day tanks" will be refilled, as needed, from the hazardous material containers stored in the hazardous material storage building. No underground hazardous materials storage tanks currently exist or are proposed to be installed at the facility as part of this project.

Spill Prevention, Control, and Countermeasure Plan

As part of the application, the applicant submitted a draft SPCC Plan (see Attachment 28), prepared by Sespe Consulting, Inc., dated September 2018 (updated November 2020), to identify procedures and controls for preventing accidental releases of petroleum products and to minimize the impact if a release occurs as required by Title 40 CFR Part 112 and the CA HSC, Chapter 6.67, § 25270 – Aboveground Petroleum Storage Act (APSA). On January 1, 2008, the CUPAs were vested with the responsibility and authority to implement the APSA. The storage statement requirements are included in this authority, but most facilities now meet the requirement by having a current HMBP under the Hazardous Release Response Plans and Inventories program pursuant to CA HSC, Division 20, Chapter 6.95 § 25500.

The draft SPCC Plan includes a list of petroleum product containing tanks and a site plan showing the locations of these tanks at the facility. The facility will have the following petroleum product containing tanks: (1) cone bottom waste receiving tanks; (2) mix tanks; (3) oil/water separator; (4) skim oil tanks; (5) waste oil and motor oil drums; and, (6) diesel fuel tank. There will not be any completely or partially buried tanks that contain petroleum products at this facility. The draft SPCC Plan also includes a description of the materials stored at the facility, the discharge prevention measures, drainage control measures, spill response procedures, methods of waste disposal, containment specifications, and administrative procedures. EHD staff reviewed the applicant's draft SPCC plan and determined that it contains the required information for a SPCC Plan. The Permittee will be required, as a condition of approval, to submit a final SPCC Plan certified by a registered professional engineer to EHD for review and approval prior to renewed operations of the facility (i.e., prior to the issuance of a Zoning Clearance for Construction). With the implementation of this condition of approval, the proposed project will have a less than significant project-specific impact as it relates to hazardous materials.

Safety Handbook
As part of the application, the applicant submitted a Safety Handbook (Attachment 30), prepared by Tim Koziol, CEO of RI-NU, for the proposed wastewater treatment facility. The Safety Handbook is divided into five sections: (1) Foreword; (2) Injury and Illness Prevention Program (IIPP); (3) Code of Safe Practices; (4) Safety Standards; and, (5) General Safety Policies. The Safety Handbook is intended to achieve an injury-free workplace.

An IIPP is an element required by CCR, Title 8, § 3203 for all employers. It consists of seven established criteria (responsibilities, compliance and disciplinary policy, communication, identification of workplace hazards, accident reporting and investigating, employee training and record keeping). The IIPP is the core of the administrative portion of the handbook. The Code of Safe Practices section are not practices required by a regulatory body, but rather reflect current laws that will be implemented to complement independent study or assist in tailgate safety meetings. The Safety Standards section includes written job procedures utilized in most of the daily activities of the facility. Most of the written job procedures are regulatory and reference applicable federal and state laws. The General Safety Guidelines section encompasses all other written safety material that is not a daily function of the business. As noted above under the heading "Chemical Incompatibility Plan," the Safety Handbook will be supplemented by the Chemical Incompatibility Plan. With the implementation of this Plan and the procedures outlined in the Safety Handbook, the proposed project will have a less than significant project-specific impact as it related to hazardous materials.

Based on the discussion above, potentially significant project-specific impacts have been identified and, thus, with the incorporation of the above-referenced EHD and VCFPD conditions of approval, and recommended mitigation measures identified in the RMA, the project-specific and cumulative impacts related to hazardous materials will be less than significant.

20A-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 20A of the Initial Study Assessment Guidelines upon implementation of the recommended conditions of approval and mitigation measures outlined herein.

Mitigation/Residual Impact(s): Potentially significant project-specific impacts on the environment and human health related to the storage, handling, and on-site transportation of hazardous materials have been identified, but the following mitigation measures will be incorporated as conditions of approval of the project in order to reduce the significant impacts to a level of less than significant:

Risk Management Plan – Mitigation Measure (M-4)
Purpose: The purpose of the Risk Management (RM) Plan is to reduce the risk posed by the operation of the wastewater treatment facility to the public and the environment as

identified in the Risk Management Analysis prepared by Ensafe, Inc., dated January 4, 2019 and Dr. Daniel Tormey's September 6, 2018 Technical Memorandum.

Requirement: The Permittee shall prepare and submit a RM Plan to supplement the January 2017 Operations and Maintenance (O&M) Manual to the Planning Division for review and approval. The O&M Manual focuses on the treatment system. The RM Plan shall consider facility operations as a whole. The following elements shall be included in the RM Plan, which are the same elements required for those facilities (regulated by the EPA) that use certain hazardous substances, pursuant to the 1990 Clean Air Act (CAA, § 112 (r)):

1. Results of the design optimization of the chemical feed areas will become standard operating procedures to minimize opportunities for on-site vehicle collisions. The procedures shall include elements considered in the design optimization, how these elements were addressed in the modified design, and identification of controls (e.g. signs, barricades, other controls). In addition to these written procedures, a site plan shall be included in the Plan to show the modified design with controls.

2. Design and construct a hazardous material storage building compliant with local and state chemical storage and fire protection standards. The design shall incorporate these regulatory standards and include a description of how the storage building will comply with these standards.

3. Establish on-site designated paths to the hazardous materials storage building for delivery trucks. A site plan shall be included in the Plan to show the designated paths, as well as controls to assure compliance (e.g., signs, barricades, and other controls).

4. Post appropriate hazard warning signage at the hazardous materials storage building. The signage shall be identified as part of the design and construction of the hazardous materials storage building.

5. Post appropriate informational signage at the truck unloading area to identify unloading valves and piping. The Plan shall provide a map of valves and piping at the truck unloading area to minimize the potential for unloading to the incorrect valve or pipeline.

6. Use of double-walled tubing for chemical transfers. The Plan shall include a modified site plan identifying those chemical transfer areas that will have double-walled tubing.

7. Identify and track the potential for chemical incompatibilities. The RM Plan shall identify a clear protocol for identifying the potential for chemical incompatibilities in

any chemical accepted, used or handled at the facility. The protocol shall include requirements for the following:

a. Profile chemicals accepted, used, or handled at the facility. The profiling shall include both accepted waste streams, and any other treatment chemicals stored or used at the facility. Profiling shall include identification of chemicals that otherwise may only be indicated by a trade name by the chemical supplier.

b. Use of chemical incompatibility charts and references to identify the potential adverse effects from mixing of chemicals on the facility.

c. For those chemical incompatibilities that may lead to adverse effects, the Plan shall identify a hierarchy of controls to ensure incompatible chemicals are not mixed.

Documentation: The Permittee shall submit three copies of the RM Plan to the Planning Division for review and approval by the Planning Division, EHD, and, if necessary, Fire Prevention District. The RM Plan shall be prepared by a qualified firm, as determined by the Planning Division in consultation with EHD and VCFPD, as needed. If the Permittee proposes to modify the RM Plan, or a change is dictated by a local, state, or federal regulatory agency, the Permittee shall first contact the Planning Division to determine the appropriate authorization required to allow for this modification. Depending on the extent of the change to the RM Plan, the Planning Division's authorization for any modifications to the RM Plan may require a discretionary modification to the CUP. The appropriate authorization will be subject to determination by the Planning Division. Modifications to the RM Plan shall not be implemented by the Permittee until such modification has been reviewed and approved by the Planning Division. A tracking sheet shall be required to be inserted at the front of the RM Plan for the Permittee to document changes to the Plan, identify the reason for the change, section(s) modified, and authorized approval.

Timing: The Permittee shall submit three copies of the RM Plan to the Planning Division for review and approval to verify the requirements of this condition have been met prior to the issuance of a Zoning Clearance for Construction. The approved RM Plan shall be implemented for the life of the permit.

Monitoring and Reporting: The Planning Division will maintain a copy of the approved RM Plan in the Project file. As part of the standard tri-annual Condition Compliance review, the tracking sheet shall be reviewed by the Planning Division and compared to the approved permits for the facility. The Planning Division and EHD have the authority to conduct site inspections to ensure that the Permittee complies with this condition for the life of the permit, consistent with the requirements of NCZO section 8114-3.

Chemical Incompatibility Plan – Mitigation Measure (M-5)

Purpose: The purpose of the Chemical Incompatibility (CI) Plan is to reduce the risk of human error related to the storage and handling of on-site chemicals and subsequent

potential risk to the public and the environment as identified in the Risk Management Analysis prepared by Ensafe, Inc., dated January 4, 2019 (updated May 2021) and Dr. Daniel Tormey's September 6, 2018 Technical Memorandum.

Requirement: The Permittee shall prepare and submit a CI Training Plan to supplement the Facility's Safety Handbook to the Planning Division for review and approval. The following elements shall be included in the Plan:

1. Establish policies that (1) prohibit receipt of wastes in totes or drums and (2) prohibit pumping of drums or totes (either waste totes/drums or product totes/drums) into any vacuum truck. Employee training shall include procedures for identification of improper containers and specific procedures to ensure that material in totes or drums is not introduced into vacuum trucks.

2. Implementation of a new chemical introduction and procurement policy. This policy shall be implemented when a new chemical used to modify the chemical composition of a waste stream is brought onsite. The policy shall, at a minimum, include the elements described in Item 7 of the Risk Management Plan ("Consistent identification and tracking of the potential for chemical incompatibilities"). The policies, procedures, and controls for consistent identification and tracking of the potential for chemical incompatibilities shall be clearly and thoroughly described in the Training Plan.

Documentation: The Permittee shall submit three copies of the CI Plan to the Planning Division for review and approval to verify that the requirements for this condition have been met. The CI Plan shall be prepared by a qualified firm, as determined by the Planning Division in consultation with EHD and VCFPD, as needed. If the Permittee proposes to modify the CI Plan, or a change is dictated by a local, state, or federal regulatory agency, the Permittee shall first contact the Planning Division to determine the appropriate authorization required to allow for this modification. Depending on the extent of the change to the CI Plan, the Planning Division's authorization for any modifications to the CI Plan may require a discretionary modification to the CUP. The appropriate authorization will be subject to determination by the Planning Division. Modifications to the CI Plan shall not be implemented by the Permittee until such modification has been reviewed and approved by the Planning Division. A tracking sheet shall be required to be inserted at the front of the CI Plan for the Permittee to document changes to the Plan, identify the reason for the change, section(s) modified, and authorized approval.

Timing: The Permittee shall submit three copies of the CI Plan prior to the issuance of a Zoning Clearance for Construction. The approved CI Plan shall be implemented for the life of the permit.

Monitoring and Reporting: The Planning Division will maintain a copy of the approved CI Plan in the Project file. As part of the standard tri-annual Condition Compliance review, the tracking sheet shall be reviewed by the Planning Division and compared to the approved permits for the facility. The Planning Division and EHD have the authority to

conduct site inspections to ensure that the Permittee complies with this condition for the life of the permit, consistent with the requirements of NCZO section 8114-3.

Tabletop Response Drill – Mitigation Measure (M-6)

Purpose: The purpose of the Tabletop Response Drill is to reduce the risk posed by the operations of the wastewater treatment facility to the public by adequately apprising first responders about the risks posed by the on-site chemical storage, chemical handling procedures, on-site equipment, and the processes required to abate hazardous conditions as identified in the Risk Management Analysis prepared by Ensafe, Inc., dated January 4, 2019 (updated May 2021) and Dr. Daniel Tormey's September 6, 2018 Technical Memorandum.

Requirement: The Permittee shall hold an annual Tabletop Response Drill at the facility for first responders with participation by facility employees and contractors. The drill shall be conducted onsite and consider situations requiring emergency response. The drill shall identify the roles and responsibilities of facility personnel, emergency response personnel, and identify an Incident Command Structure. The situations to be tested by the drill shall be reviewed and approved by the Planning Division, EHD, and the VCFPD.

Documentation: The Permittee shall submit a framework for the drill that covers realistic scenarios to the Planning Division, CUPA-EHD, and the VCFPD for review and approval prior to implementation of each annual drill. If the Permittee proposes to modify any aspect of the approved drill framework and scenario, or a change is dictated by a local, state, or federal regulatory agency, the Permittee shall first contact the Planning Division to determine the appropriate authorization required to allow for this modification. Depending on the extent of the change to the drill framework and scenario, the Planning Division's authorization for any modifications may require a discretionary modification to the CUP. The appropriate authorization will be subject to determination by the Planning Division. Modifications to the framework and scenario shall not be implemented by the Permittee until such modification has been reviewed and approved by the Planning Division. A tracking sheet shall be required to be inserted at the front of the drill framework and scenario for the Permittee to document changes, identify the reason for the change, section(s) modified, and authorized approval.

Timing: The Permittee shall submit a framework for the drill to the Planning Division, EHD, and the VCFPD for review and approval prior to implementation of the annual drill and prior to the issuance of the Zoning Clearance for Use Inauguration. Annual tabletop drills shall be implemented for the life of the permit.

Monitoring and Reporting: The Planning Division will maintain a copy of the approved drill framework and scenario in the Project file. As part of the standard tri-annual Condition Compliance review, the tracking sheet shall be reviewed by the Planning Division and compared to the approved permits for the facility. The Planning Division and EHD have the authority to conduct site inspections to ensure that the Permittee complies with this condition for the life of the permit, consistent with the requirements of NCZO section 8114-3.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
20b. Hazardous Materials/Waste – Waste (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 20b of the Initial Study Assessment Guidelines?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 20b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

20b-1. The proposed project includes activities that will routinely generate small amounts of hazardous waste related to vehicle and equipment maintenance, which require specific handling and disposal protocols. Potential sources of hazardous waste generation are shown in the following table:

Waste	Physical State	Largest Container	Maximum Quantity
Waste Motor Oil	Liquid	55 gallons	110 gallons
Waste Antifreeze	Liquid	55 gallons	110 gallons
Waste Absorbent	Solid (soils or absorbent)	One 55-gallon drum (250 pounds)	2 drums (500 pounds)
Spent Carbon	Solid	5 Tons	20 Tons
Spent Bag Filters	Solid	1 bag	20 bags

Any hazardous wastes generated onsite as a result of treatment equipment or vehicle maintenance, or have been analyzed and generated in the proposed on-site laboratory, must be identified, containerized, segregated, labeled, and then properly transported offsite to a licensed disposal facility in compliance with federal, state, and local regulations.

The wastes accepted at the proposed facility will include produced water, drilling waste, oily sludge, and other petroleum-related wastes which are managed as non-hazardous solid wastes under federal law, pursuant to the Oil Exploration and Production (E&P) Wastes exemption codified in Title 40 CFR, section 261.4(b)(5), and included, with limitations, in Title 22 CCR sections 66261.4(b)(2) and 66261.24(a)(1). The exemption applies in California if the waste displays the toxicity characteristics for hazardous waste based solely on the Toxicity Characteristic Leaching Procedure, as provided under 22 CCR, § 66261.24.

In order for RI-NU to qualify as a non-hazardous wastewater treatment facility, all waste proposed to be accepted and processed at the facility will be characterized to determine whether it is hazardous in accordance with the facility's Waste Analysis Plan (WAP) (Attachment 31), prepared by Ensafe, Inc., dated April 2017, in accordance with the Environmental Health Standards for the Management of Hazardous Waste, codified in the CCR, Title 22 section 66264.13, and in accordance with Title 40 of the CFR, Part 264 (40 CFR 264). The WAP therefore is the pivotal activity for properly ensuring that the wastewater treatment facility does not accept and process hazardous materials and complies with the applicable regulations for proper waste treatment, storage, or disposal.

The applicant's draft WAP is significantly different than the previous operator's waste acceptance practices in that the proposed operation will now include an on-site laboratory to conduct internal sample analyses to compare to third party analyses submitted by a generator (contractor) *prior* to receiving the waste streams at the facility. If the profile of the waste streams proves acceptable to accept and process at the facility, the generator will transfer the waste to the facility where another sample of the waste stream will be tested in the operator's on-site laboratory to compare to the original waste stream sample supplied by the generator. If the waste load fails either the physical inspection or the analytical check, it is rejected, and the generator will be required to leave the facility without unloading the waste. These practices include checks and balances (that were not implemented by the previous operator) to ensure that the proposed operation does not accept a waste stream that is a hazardous waste. EHD reviewed the draft WAP and determined that it has been prepared in compliance and accordance with the federal and state regulations.

In order to ensure potential impacts from hazardous wastes generated at the facility are less than significant, the following conditions of approval will be required to be satisfied by the Permittee prior to, and for the duration of, the operation of the facility:

(1) Operate the wastewater treatment facility in compliance with federal, state, and local regulations pertaining to the safe storage, handling, labeling and disposal of hazardous wastes generated onsite;

(2) Submit a final WAP to the Planning Division, in consultation with EHD, for review and approval prior to operation of the facility;

(3) Maintain a hazardous waste generator EPA I.D. number issued by the California Department of Toxic Substances Control in the event hazardous waste is generated at the facility; and,

(4) Obtain a hazardous waste generator permit from EHD/CUPA (Refer to Section A.10, Table A, above).

As described in Section B.20(a) above, the Permittee will also be required, as a mitigation measure to prepare a Chemical Incompatibility Training Plan (Refer to M-3), which will include policies that (1) prohibit receipt of wastes in totes or drums; (2) prohibit pumping of drums or totes into any vacuum trucks; and, (3) require consistent identification and tracking of the potential for chemical incompatibilities. This training plan will supplement the other actions to be taken (e.g., SPCC Plan, WAP, Risk Management Plan) to reduce the risk posed by the facility to the public and the environment.

With the implementation of the foregoing conditions of approval, project-specific and cumulative impacts related to hazardous waste will be less than significant.

20b-2. Through compliance with federal, state and local laws, the proposed project will be consistent with the applicable General Plan Goals and Policies for Item 20(b) of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
21. Noise and Vibration								
Will the proposed project:								
a) Either individually or when combined with other recently approved, pending, and probable future projects, produce noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies and Programs (Section 2.16) or the applicable Area Plan?		X				X		
b) Either individually or when combined with other recently approved, pending, and probable future projects, include construction activities involving blasting, pile-driving, vibratory compaction, demolition, and drilling or excavation which exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment (Section 12.2)?		X				X		
c) Result in a transit use located within any of the critical distances of the vibration-sensitive uses listed in Table 1 (Initial Study Assessment Guidelines, Section 21)?	X				X			

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
d) Generate new heavy vehicle (e.g., semi-truck or bus) trips on uneven roadways located within proximity to sensitive uses that have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the Transit Use Thresholds for rubber-tire heavy vehicle uses (Initial Study Assessment Guidelines, Section 21-D, Table 1, Item No. 3)?		X				X		
e) Involve blasting, pile-driving, vibratory compaction, demolition, drilling, excavation, or other similar types of vibration-generating activities which have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment [Hanson, Carl E., David A. Towers, and Lance D. Meister. (May 2006) Section 12.2]?		X				X		
f) Be consistent with the applicable General Plan Goals and Policies for Item 21 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

21a., 21b., and 21e. According to the Ventura County Initial Study Assessment Guidelines (ISAGs), noise is defined as any unwanted sound that is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying. Noise impacts can occur during the construction and/or operational phases of a project. The ISAGs methodology used in determining whether or not a project will result in a significant noise impact is to first determine whether the proposed use is a "Noise Sensitive Use" or a "Noise Generator." "Noise Sensitive Uses" are dwellings, schools, hospitals, nursing homes, churches and libraries, as defined in the ISAGs. Since the proposed wastewater treatment facility is not a "Noise Sensitive Use," it is therefore considered a potential "Noise Generator." The next step is to determine the noise-generating equipment's and activities' estimated noise levels and the times at which the noise levels would occur, and the proximity of the noise-generating equipment to a noise sensitive use using the project plans, information gathered during a site visit, aerial imagery, and land use maps that are available from the Ventura County GIS Division.

In accordance with the ISAGs and, by reference, the Ventura County General Plan Goals, Policies and Programs, Noise 7.9, HAZ Policy 9.2-4, any new noise generators proposed

to be located near any noise sensitive uses shall incorporate noise control measures so that ongoing outdoor noise levels received by a noise sensitive use receptor does not exceed any of the following noise standards:

a. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.
b. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.
c. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.[40]

Staff's preliminary noise assessment for the proposed project revealed that the project could have the potential to exceed the noise standards due to the proposed 24-hour operation, truck traffic, the use of potential noise-generating equipment, and the location of the project in relationship to noise sensitive use receptors. The applicant retained Sespe Consulting, Inc., to prepare a Noise Impact Assessment (NIA) (Attachment 32) to quantify and determine the significance of noise impacts associated with the proposed project, which is further described in more detail below.

Existing Setting
The existing facility is located at 815 Mission Rock Road, in the unincorporated area of Santa Paula. State Route 126 is located 0.3 miles to the north and the Santa Clara River basin runs east-west approximately 0.4 miles to the south. The existing facility is located in the heaviest industrially-zoned area of Ventura County and is surrounded by both industrial and agricultural land uses. Potential noise-generating land uses (such as vehicle salvage storage yards, truck transportation facilities, a dog kennel, and a cement manufacturing facility) are located to the east and south of the proposed project. Immediately west/northwest of the proposed project is farmland and southwest of the project site is a two-story dwelling, which are uses not expected to generate significant noise levels.

Operational Noise
The NIA only analyzed nighttime thresholds (10:00 p.m. to 6:00 a.m.) because the project is not expected to create any new daytime or evening noise impacts. The assumptions included in the NIA that were utilized in the industrial source model are summarized below:

[40] If ambient noise levels at nearby noise sensitive use receptors exceed the fixed Leq1H thresholds from the noise levels listed above, then the measured ambient noise level plus 3 dB(A) will be used as the noise standard to determine the significance of the project noise impacts.

- The most dominant noise sources (i.e., centrifuges, mixing tanks) are modeled as point sources in the appropriate locations. General site noise sources (i.e., transfer pumps, other non-specific industrial sources) were also modeled as area sources because this measurement includes a variety of low intensity sources that are expected to occur throughout the on-site facility. Front-end loader operations are modeled as area sources within the mixing areas.
- The two on-site parking areas are modeled as parking lots to account for noise generated by the ingress and egress of employee vehicles. Employee vehicles will arrive and depart the site during each of the three shift changes.
- Because the area is relatively flat, terrain elevations are not included with the exception of the mixing area/pit. The mixing pit slopes downward from east to west with a maximum depth of approximately 5 feet. This is where the front-end loader will operate during nighttime processing operations.
- All noise sources (loader, pumps, mixing tanks, centrifuges) are assumed to operate simultaneously during the nighttime peak hour.
- Reference noise spectrums from the SoundPLAN Essential 3.0 database were utilized to more accurately account for the frequency distribution of each industrial source.
- The facilities proposed buildings (office, laboratory, employee changing room, and hazardous materials storage building) were included in the model as permanent noise obstructions. The five large tank farms located onsite were also included as "industrial area" volume attenuation areas.
- The proposed landscape areas were also included as "foliage" ground absorption attenuation areas along the appropriate facility boundaries, which provides a very small amount of added attenuation as noise propagates through them. Paved areas were also included as hard surfaces, which slightly increase noise levels.
- The approximately 6-foot-high wooden fence surrounding an off-site dwelling (Receptor 1) was included as an existing wall. Receptor 1 is a two-story dwelling that has few windows and no doors in areas facing the facility.

The NIA identified three noise sensitive use receptors in the immediate vicinity of the project site. Other noise sensitive use receptors in the surrounding area are further away and are not expected to experience project noise. Receptor 1 (R1) is a two-story residential dwelling located approximately 40 feet southwest of the project site at 907 Mission Rock Road in the agriculturally-zoned area. Receptor 2 (R2) is an on-site caretaker dwelling unit for an existing vehicle salvage storage yard located approximately 40 feet northeast of the project site located at 734 Mission Rock Road in the industrial zoned area. Receptor 3 (R3) is a one-story residential farmworker dwelling located approximately 190 feet northwest of the project site at Pinkerton Road in the agricultural zoned area. Receptor 2 (i.e., on-site caretaker dwelling unit) is not considered a "noise sensitive" residential dwelling since it has been approved as accessory to the industrial use on the property. Although typically industrial noise has the potential to adversely affect dwellings, dwellings for caretakers of industrial sites are not considered "noise

sensitive" as they are expected to be subject to noise levels that are typical of industrial sites and are generally higher than those experienced within residentially-zoned and residentially-developed areas. The locations of these three noise sensitive use receptors are shown in Attachment 16 of the NIA (Attachment 32).

To minimize potential noise impacts on noise sensitive use receptor R1, the applicant proposes to install dense trees and shrubs along the perimeter of the project site, including along the property line nearest to noise sensitive use receptor R1 and proposes to reconfigure the current layout of the facility so that the processing operations and employee vehicle parking are closer to the center, eastern and northern portions of the property. The property line nearest to noise sensitive use receptor R1 will be primarily used for administrative office functions.

The NIA determined that the loudest noise-generating activity at the facility is expected to be truck deliveries, including backup alarms. However, truck deliveries will be limited to daytime hours only and are not expected to exceed daytime noise thresholds as specified in the ISAGs. The NIA also determined that the proposed activity that may increase noise impacts from baseline conditions is the extension of facility processing hours from 5:00 a.m. to 11:00 p.m. to 24 hours per day. Truck deliveries will not occur after 7 p.m. during the weekdays and after 3 p.m. on Saturdays. Nighttime truck deliveries are currently not allowed and are not proposed to be allowed, except for emergency situations that have to be approved by the Planning Director. Therefore, the NIA primarily evaluates noise impacts resulting from proposed nighttime processing operations at the facility (e.g., the use of the wastewater treatment processing equipment).

The NIA concludes that the nighttime processing operations that may generate noise include the equipment used to process waste materials (such as, pumps and centrifuges), a front-loader, and employee arrival, departure, and parking. The noise from evening and nighttime processing operations will primarily be limited to running electric pumps and operating equipment. The applicant also proposes to increase the existing, permitted total on-site facility employees from 15 to 40. The employees will work in three separate, eight-hour shifts: 15 employees from 6:00 a.m. to 2:00 p.m., 15 employees from 2:00 p.m. to 10:00 p.m., and 10 employees from 10:00 p.m. to 6:00 a.m. The noise generated by employee vehicles parking onsite during each of the three specific shifts is also evaluated in the NIA.

In order to determine the appropriate noise standard for the proposed project, the NIA needed to establish the existing ambient noise environment. To quantify the existing ambient noise environment experienced by nearby noise sensitive use receptors, two long-duration (24-hour) reference noise measurements were conducted at the project site from April 12, 2017 to April 14, 2017. The noise measurements were recorded using Quest DL SoundPro, Type 2 noise meters. The noise meter was programmed in "slow" mode, in "A" weighted form, and one-minute logging for the entire measurement duration.

The locations of the noise measurements and the corresponding noise sensitive use receptors are shown in Figure 2 (Appendix A) of the NIA.

In order to characterize the project industrial noise sources, the NIA used a combination of noise monitoring and documented Ventura County reference data to determine the noise level generated by proposed nighttime industrial operations. On April 24, 2017, noise monitoring was conducted at a different wastewater treatment facility, the Patriot Environmental Services' Anaheim facility. The industrial source noise measurements collected at the Anaheim facility were not used to represent noise generated by the entirety of the proposed project facility, but rather to confirm the contribution of singular pieces of industrial equipment (i.e., tanks, centrifuges, pumps). Similarities between the size, throughputs, number of trucks, hours of operation, etc., between the proposed facility and the Anaheim facility have no bearing on the results of the modelled noise impacts. However, the Anaheim facility also receives and treats non-hazardous wastewater using many of the same processes and equipment (i.e., mixing tanks, pumps) that are proposed for use at the project site and, therefore, the recorded noise levels could be utilized to accurately model the industrial noise generated at the proposed facility in the unincorporated area of Santa Paula.

Measurements at the Anaheim facility were collected at a set distance (e.g., 13 feet and 5 feet) while each individual piece of equipment was operating at full power on its own (i.e., no interference from other operations) over a given time duration. Using these source measurements, the equipment noise levels were then input into the SoundPLAN modeling software to determine the proposed facility's overall operational noise impacts at nearby noise sensitive use receptors. As described in the NIA, using the data measured in Anaheim, a total of nine-point sources, used to represent louder mixing tanks/dewatering centrifuges, and five area sources, used to represent quieter pumps, liquid transfer stations, and general industrial noise, were input into the SoundPLAN model. Mobile equipment (e.g., front-end loaders) noise was also input into the model to represent area sources, using reference noise levels provided within Ventura County's Construction Guidelines.

Noise measurements of a centrifuge dewatering unit operating at a similar wastewater processing facility in Ventura County were also utilized. For mobile equipment (i.e., front-end loaders) noise levels, documented reference noise source information from the Ventura County Construction Guidelines were utilized. Based on the results of the industrial source nighttime prediction model for the three noise sensitive use receptors near the facility (R1, R2, and R3), all project noise is below the ambient noise level plus 3dB(A) nighttime significance threshold as shown in the table below and in Table 4 of the NIA:

Industrial Source Nighttime Noise Impacts

Receptor	Ambient Noise	Project Noise	Total Noise	Threshold	Significant?
Receptor 1	52.2	36.0	52.3	55.2	No
Receptor 2	52.2	36.6	52.3	55.2	No
Receptor 3	52.2	29.1	52.2	55.2	No

Thus, the NIA concludes that the project noise impacts are less than the applicable thresholds. The table above shows that the existing ambient noise level dominates the noise environment in this area (ambient levels are 7.2 dB(A) over the designated Ventura County nighttime significance threshold of 45 dB(A)). However, the project's nighttime noise impacts, which range from 29.1 to 36.6 dB(A), are below the unadjusted significance threshold. The NIA finds that the project daytime and evening industrial noise impacts are expected to be reduced or remain unchanged as a result of the proposed modifications, project nighttime industrial noise impacts are less than significant at the nearby noise sensitive use receptors without mitigation, and the project will result in a Class III, less than significant, noise impact.

Construction Noise

Standardized federal or state criteria have not been adopted for assessing construction noise impacts. Therefore, municipal planning criteria are generally developed and applied on a project-specific basis. Construction project noise criteria take into account the existing noise environment, the time-varying noise during the various phases of construction activities, the duration of the construction, and adjacent land uses.

Specific construction noise limits for noise-sensitive locations are not currently specified in the Ventura County General Plan or administrative code of the County of Ventura. Therefore, the Construction Noise Threshold Criteria and Control Plan (Attachment 33), adopted by the Board of Supervisors in November 2005 and amended in July 2010, is intended to establish construction noise thresholds and standard noise monitoring and control measures. These threshold criteria, monitoring and control measures shall be applied to all discretionary development projects, including the subject project.

Much of the facility is already built-out. However, the applicant proposes to remove some of the old tankage and processing equipment and replace it with new equipment to match the proposed waste processing design. No new construction requiring significant foundation work or other large-scale development is proposed as part of the proposed modification. The proposed reconfiguration of the facility will occur intermittently over a six to nine-month period, will be temporary in nature, and is not expected to generate construction noise levels in excess of what the existing permitted facility generated under CUP 960, as modified by LU06-0011. During daytime hours, construction work for the project shall be in compliance with the County of Ventura's Construction Noise Threshold Criteria, which normally prohibits evening or nighttime construction activity in areas of noise-sensitive receptors. Since the project site is located within 40 feet of a noise sensitive use, evening and nighttime construction activities will be prohibited. However,

in the event a particular type of construction activity is deemed necessary and is allowed by the Planning Director, reduced noise threshold criteria are provided for construction that must occur during evening and/or nighttime hours. Emergency construction work is exempt from these construction noise thresholds.

Daytime Construction - Daytime (7:00 a.m. to 7:00 p.m. Monday through Friday, and from 9:00 a.m. to 7:00 p.m. Saturday, Sunday and local holidays) generally means any time period not specifically defined as a more noise sensitive time period. The daytime construction noise threshold criteria are given in Figure 4 of the Construction Noise Threshold Criteria (and shown below). Depending on project duration, the daytime noise threshold criteria shall be the greater of the fixed Leq(h) limit (which includes non-construction evening and nighttime noise) or the measured ambient Leq(h) plus 3 dB.

Figure 4. Daytime Construction Activity Noise Threshold Criteria

Construction Duration Affecting Noise-sensitive Receptors	Noise Threshold Criteria shall be the greater of these noise levels at the nearest receptor area or 10 feet from the nearest noise-sensitive building	
	Fixed Leq(h), dBA	Hourly Equivalent Noise Level (L_{eq}), dBA[1, 2]
0 to 3 days	75	Ambient L_{eq}(h) + 3 dB
4 to 7 days	70	Ambient L_{eq}(h) + 3 dB
1 to 2 weeks	65	Ambient L_{eq}(h) + 3 dB
2 to 8 weeks	60	Ambient L_{eq}(h) + 3 dB
Longer than 8 weeks	55	Ambient L_{eq}(h) + 3 dB

Note 1. The instantaneous L_{max} shall not exceed the NTC by 20 dBA more than 8 times per daytime hour.
Note 2. Local ambient Leq measurements shall be made on any mid-week day prior to project work.

Because of the close proximity of a noise-sensitive use to the project site, the Permittee will be required, as a condition of approval, to provide the potentially affected community (within 300 feet of project), a “Hot Line” telephone number, that is attended during active construction working hours for use by the public to register complaints. Each noise complaint that is logged with the Permittee shall be forwarded to Planning Division case planner who will document each complaint and determine whether additional noise mitigation or adjustments to the hours and days of construction is warranted during the construction phase of the project. If the construction noise threshold criteria are *not* exceeded, impacts from the construction of the wastewater treatment facility will be less than significant and temporary in nature.

21c. The Ventura County Initial Study Assessment Guidelines define vibration as “a motion that repeatedly reverses itself.” The most common type of environmental impact involving vibration consists of ground vibration, which is the periodic displacement of earth, which creates vibration waves that move through soil and rock strata, foundations of nearby buildings, and then throughout the parts of the building structure. Common sources of ground-borne vibrations are trains, buses on rough roads, and construction activities such as blasting, pile-driving and operating earthmoving equipment. No new construction requiring significant foundation work or other large-scale development is

proposed as part of the project. Therefore, the proposed project does not have the potential to generate ground born vibrations.

21d. Truck delivery hours on Monday through Friday will be extended for an additional two-hour period, from 5:00 p.m. to 7:00 p.m. The number of weekly haul truck deliveries will not change from what is currently permitted under CUP 960 (as modified by LU06-0011), which authorizes up to 500 trucks per week. This represents a negligible change in noise levels given that the additional hours are during the daytime period as established in the ISAGs, and the total number of trips will not increase. Therefore, based upon the information presented in the NIA, the increase in delivery hours without an increase in the number of deliveries will actually decrease the number of trips per hour and the peak hour noise level, which is the basis of significance determination. As a result, the noise impacts from the increased hours of truck deliveries are expected to be less than significant.

21f. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 21 of the ISAGs.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
22. Daytime Glare								
Will the proposed project:								
a) Create a new source of disability glare or discomfort glare for motorists travelling along any road of the County Regional Road Network?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 22 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

22a. The Ventura County Initial Study Assessment Guidelines describe daytime glare as intense light that is blinding or discomforting to humans, particularly motorists. Conditions that create daytime glare are typically caused by the reflection of sunlight from highly reflective surfaces at or above eye level. Daytime glare is caused by the reflective surfaces of buildings, structures, or facilities with materials such as metal or glass. The proposed project does not include equipment and buildings that have reflective surfaces. The existing and proposed equipment and buildings consist of materials such as wood, painted (non-gloss) panels, and non-gloss/reflective metals. Thus, the proposed project will have no glare impact.

22b. Given that there are no glare impacts, the proposed project is consistent with the applicable General Plan Goals and Policies for Item 22 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
23. Public Health (EHD)								
Will the proposed project:								
a) Result in impacts to public health from environmental factors as set forth in Section 23 of the Initial Study Assessment Guidelines?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 23 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
23a. The Ventura County Initial Study Assessment Guidelines describe a public health issue as a human health related issue such as, but not limited to, vectors, bioaerosols and other pathogens or environmental factors that may pose a potential hazard to public health. EHD has reviewed the proposed project and has determined that there may be impacts to public health due to on-site storage and handling of hazardous materials and wastes; however, the operator's compliance with applicable federal, state, and local regulations pertaining to the storage, handling and disposal of hazardous materials and wastes will reduce potentially significant impacts to a level of less than significant. Implementation of the conditions of approval and mitigation measures outlined in Section B.20(a) and (b) above, will reduce any potentially significant impacts as it related to public health to a level of less than significant.

The proposed project may cause a public health impact related to breeding and harborage of vectors of disease, including insects (i.e., mosquitoes). As a condition of approval, the Permittee will be required to properly manage standing water to ensure the site does not contribute to the breeding and harborage of potential vectors of disease, or create a public nuisance. Implementation of this condition of approval will reduce the potentially significant impacts related to breeding and harborage of vectors of disease and thus the impacts will be less than significant.

23b. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 23 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
24. Greenhouse Gases (GHG) (VCAPCD)								
Will the proposed project:								
a) Result in environmental impacts from greenhouse gas emissions, either project specifically or cumulatively, as set forth in CEQA Guidelines §§ 15064(h)(3), 15064.4, 15130(b)(1)(B) and -(d), and 15183.5?		X				X		

Impact Discussion:

24a. Climate change is the observed increase in the average temperature of earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during past ice ages. According to the United Nations' Intergovernmental Panel on Climate Change (IPCC) "*Fourth Assessment Report, Climate Change 2007*," most of the observed increase in global average temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic (human-induced) concentrations of these three gases, collectively known as Greenhouse Gases (GHGs), which are gases that absorb and re-emit infrared radiation into the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO2), methane (CH4), nitrous oxides (N2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF6).

Due to the global nature of the effects of GHG emissions, the primary CEQA concern with GHG emissions is the cumulative impact of a project's incremental GHG emissions when viewed in connection to past, current, and probable future project GHG emissions. The Ventura County APCD has not adopted a GHG threshold of significance for projects subject to the County's discretionary land use permitting authority. However, APCD has indicated a preference for GHG significance thresholds that are consistent with those of the South Coast AQMD because its jurisdiction is adjacent to that of Ventura County APCD. South Coast AQMD considers emissions over 10,000 metric tons carbon dioxide equivalent per year (MTCO2e/Yr) to be significant for industrial projects and emissions over 3,000 MTCO2e/Yr to be significant for residential/commercial projects (South Coast Interim GHG Threshold Board Letter) According to the South Coast AQMD, industrial

projects are emission sources that require a stationary source air permit for criteria pollutants. The County has routinely applied a 10,000 MTCO2e/Yr threshold of significance to such industrial projects, in accordance with CEQA *Guidelines* section 15064.4(a)(2) and, for this project, will apply both interim thresholds for a conservative analysis. APCD has confirmed that the proposed facility must undergo a new APCD permit processing review due to replacement of its previous emission units, which will trigger compliance with APCD Rule 26, New Source Review, and Best Available Control Technology (BACT) for ROC, NOx, PM-10, and SOx. Rule 26.2.A details the BACT requirements for new, replacement, modified, or relocated emissions units.

Stationary Source Emissions

APCD does not have permitting authority to regulate GHGs. However, it can calculate GHG emissions based on the ROC emissions expected to be permitted. Going forward, these emissions will be referred to as stationary GHG emissions. The stationary GHG emissions from the proposed facility will be negligible, as this facility is not producing oilfield liquids but rather processing oilfield tank bottom waste that would have off-gassed most, if not all, GHGs contained in the oil waste liquid stream, either during production, separation, or delivery to the facility, according to the APCD Engineering Division. In addition, the previous facility did not have any CO2-combustion equipment permitted with APCD and the proposed facility is not expected to have any either (to date, APCD has not received a permit application for CO2-combustion equipment). It is important to note that GHG compounds found in oilfield production are attributed to methane (CH4), not carbon dioxide (CO2). However, for “worst-case scenario” purposes, stationary GHG emissions were calculated based on the projected annual processing throughput of 107,714 barrels of waste provided by the applicant (0.24 tons ROC per year; see Section B.1. Air Quality, Regional Air Quality, for ROC calculations) and the organic profile for crude oil evaporation determined by CARB. As such, the maximum CH4 emissions are estimated to be 0.02 tons per year or 0.51 MTCO2e/Yr. The calculated GHG stationary source emissions are based on assuming 0.885 for the Organic Reactive Fraction (FROG), 0.088 for CH4 weight fraction in crude oil (taken from CARB organic profile #297 Crude oil evaporation- vapor composite), and CH4’s Global Warming Potential (GWP) of 28.

Non-Stationary Source Emissions

Non-stationary emission sources include area (landscaping), energy (electricity and natural gas consumption), mobile (commuter and truck trips), water (including wastewater), waste (solid waste disposal), and construction (asphalt paving), The non-stationary GHG emissions for the project are derived using a statewide emissions estimating computer model, CalEEMod (California Emissions Estimator Model) Version 2016.3.2, which calculates direct emissions (area, energy, mobile), as well as indirect emissions, such as solid waste, wastewater, and water use. The calculated GHG emissions represent the increase in operational emissions from baseline (former facility’s most recent operational data, Attachment 8) in addition to construction emissions. In

order to estimate the level of emissions counting toward the significance threshold, the baseline emissions must first be quantified.

The baseline emissions estimate was calculated using the former facility's most recent operational data from 2014. (See Attachment 8). Because the applicant was unable to provide a log of daily truck trips from the prior operations, a 2014 incoming waste volume summary by month (waste volumes by waste type come from totaling daily sales records for each month for each waste stream) was used instead to best estimate the baseline of daily truck loads per day. The number of delivered waste loads were calculated assuming a truck size based on the waste type: domestic waste loads are 30 barrels, solid waste loads are 20 tons, and all other waste loads are 120 barrels. Conservatively, the calculations assumed that every load was full, meaning that the daily truck trips estimate was the lowest but most substantiated total. Loads per day were calculated using six days per week of waste delivery, and evidence demonstrating that the facility was open and accepting waste for 45.6 weeks in 2014, for 273.4 days. Based on the best available evidence (Attachment 8), the 2014 estimated baseline is determined to be 123.6 ADT (i.e., 61.80 trucks per day) and 24 ADT (12 vehicles per day) for employees.

This baseline estimate approach is consistent with CEQA Guidelines section 15125(a)(1)-(3) where the lead agency has discretion in its definition of baseline conditions based on substantial evidence presented in order to provide the most accurate picture practically possible of the project's likely impacts.

For assessing environmental significance , the emissions above these baseline emissions must be assessed. Based on proposed project information provided by the applicant, those increased emissions above the baseline will result from the proposed increase of daily employee commutes (proposing an additional 28 employees above the baseline (i.e., 12 employees) and assuming each employee drives their own vehicle), increase in truck delivery trips per day as compared to the former facility's last year of incoming delivery operations in 2014 (see Attachment 8) and energy emissions from the proposed additions of a 1,056 sq. ft. office with restroom, 648 sq. ft. laboratory with restroom and eyewash sinks, 610 sq. ft. hazardous materials storage building, and 864 sq. ft. changing/break room. The mobile, area, and energy emissions are estimated to be 303.58 MT CO2e/Yr, .00008 MT CO2e/Yr, and 11.13 MT CO2e/Y, respectively. A summary table of all GHG emissions by sources is presented in Table 2 below.

Most of the proposed GHG emissions will be generated from mobile sources. The air emissions model includes expected increases from baseline for on-site employee commutes (assumed to all be light-duty trucks) and incoming waste delivery trips (assumed to all be heavy duty diesel trucks) at maximum operational capacity. The model incorporates proposed hours of operation, with proposed truck deliveries and proposed on-site employee commutes to and from the facility occurring Monday-Saturday and only proposed on-site employee commutes occurring on Sundays. A summary table of the

baseline and proposed trips is found in Table 1 below and is broken down in the following discussion.

The existing CUP authorized a total of 15 employees, but the information available indicates that the facility operated with 12 employees. The applicant proposes to permit an additional 25 employees from the 15 existing, permitted (or 28 additional employees above the baseline of 12 employees) for a total authorization for 40 full-time employees. This equates to a representative baseline of 12 employee commuter vehicles per day (i.e., 24 ADT counting both the entrance and exit trips). The addition of 28 employees equates to 28 new vehicles per day (i.e., 56 ADT trips) for a total of 80 ADT (24 ADT (baseline) plus 56 ADT (new)). The difference between the total proposed employee vehicle trips (80 ADT) and the total baseline employee vehicle trips (24 ADT) equates to an increase of 56 ADT. See Table 1 below.

In addition, the proposed CUP allows a maximum of 500 delivery trucks per week (i.e.,1000 ADT, Monday-Saturday). Because the model requires input parameters in daily estimates, a daily truck trip average was calculated based on the weekly maximum of 1,000 ADT (500 trucks) divided by the operational days per week for truck trip deliveries (Monday-Saturday). This equates to a maximum daily average of 166.7 ADT, or 83.3 trucks per day.

The applicant proposes to add a new daily maximum truck limit of 100 (i.e., 200 ADT trips), as the existing CUP did not establish a daily maximum truck limit. This daily limit places a reasonable cap on the total number of trucks per day while allowing the applicant some flexibility for allowable trucks on individual days over a six-day operational week, so long as they still adhere to the strict weekly limit of 500 total trucks.

As described previously, based on the best available evidence (Attachment 8), the 2014 truck trips baseline is determined to be an average of 123.6 ADT trips per day (i.e., 61.8 trucks per day). The difference between the proposed maximum average truck trips per day and the baseline (123.6 ADT) equates to an increase of 43 ADT (Attachment 8). Therefore, the overall increase in ADTs for both the employee vehicle trips and the delivery truck trips is 99 ADT.

A summary table (Table 1) below shows the baseline and the proposed trips.

Table 1 - Applicant's ADT Analysis

Trucks	
Currently Permitted and Proposed Trucking:	500 trucks/week
	1,000 truck trips/week[41] (ADT)

[41] Based on a six-day week (Monday-Saturday).

Proposed Average Daily Trips (ADT):	166.7 ADT (83.3 trucks/per day)
Baseline – Actual Daily Loads from 2014 Records:	61.8 loads/per day
	123.6 ADT
Proposed ADT increase from 2014 Baseline (difference between baseline and proposed):	(166.7 ADT proposed truck trips – 123.6 ADT baseline truck trips) = **43.1 ADT**
Employees	
Currently Permitted Number of Employees:	15 per day (15 vehicles/day)
Baseline – Actual Number of Employees	12 per day (12 vehicles/day)
	24 ADT
Proposed Number of Employees:	40 per day (40 vehicles/per day)
	80 ADT
Proposed ADT increase from 2014 Baseline (difference between baseline and proposed):	(80 ADT proposed employee trips – 24 ADT baseline employee trips) = **56 ADT**
TOTAL ADT Increase (trucks and employees):	(56 ADT + 43.1 ADT) = **99.1 ADT**

For estimating construction emissions, the project description states that most of the existing facility is already built out and construction would involve removing some old tankage and equipment with new tanks and equipment. The proposed office, laboratory, and changing/breakroom will be trailer-style (modular) facilities that do not require groundbreaking construction onsite. The applicant also stated that no architectural coating operations would be performed onsite during the construction phase as new equipment and structures would already be coated prior to purchasing. In addition, the equipment/structures would be pressure-washed not re-coated for maintenance purposes. However, the applicant proposes to pave approximately 4,852 ft^2 with concrete. The concrete paving operation would result in approximately 2.68 MT of CO2e emissions. This amount is added to the operational mobile emissions estimated in the previous section. As is the practice of the South Coast AQMD, construction emissions are amortized over the life of the CUP or project. However, construction emissions will be added cumulatively to the total operational GHG emissions to be conservative. The CalEEMod report for construction emissions are located in Attachment 23 and is a separate report from the operational emissions estimate generated as shown in Attachment 22.

Incorporated into the project design are several GHG reduction strategies. Information obtained from the applicant indicates a promotion of hiring on-site employees locally, that will reduce the amount of daily and annual VMTs. In addition, without proposed treatment of waste streams at the site, the waste delivery trucks servicing wastes produced in Ventura County north and east of the facility will have to travel outside the county,

increasing the VMTs generated in the absence of the project to service facilities that currently produce industrial wastewater in Ventura County.

A summary table (Table 2) of all GHG emissions by sources is presented below. Based on this data, the APCD calculated the total GHG emissions increase beyond the baseline emissions for the proposed project to be 323.89 MT CO2e/Yr. This includes stationary, area, energy, mobile, and unamortized construction emissions. This is below both industrial and commercial interim thresholds recommended by the South Coast AQMD. Therefore, project impacts would be less than significant for GHG emissions.

Table 2 – GHG Emissions

Source Category	CO2e (MT/Yr)
Area	.00008
Energy	11.13
Mobile	303.58
Waste	4.03
Water	1.96
Stationary	0.51
Construction	2.68
Total	**323.89**
VCAPCD Threshold	**-**
SCAQMD Industrial Threshold[1]	**10,000**
SCAQMD Commercial Threshold[2]	**3,000**
Exceed Thresholds?	**No**

[1] *Industrial projects correspond to stationary sources that require an APCD permit.*
[2] *Thresholds are interim for commercial/residential and not adopted per SCAQMD.*
**Emissions rounded from CalEEMod report.*

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
25. Community Character (Plng.)								
Will the proposed project:								
a) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community in which the project site is located?	X				X			

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
b) Be consistent with the applicable General Plan Goals and Policies for Item 25 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

25a. Pursuant to the Ventura County Initial Study Assessment Guidelines, any project has the potential to have a significant impact on community character, if it is: (1) inconsistent with any policies of the General Plan or Area Plan relating to community character; or, either individually, or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, will introduce physical development that is incompatible with existing land uses, architectural form or style, site/design layout, or density/parcel sizes within the community in which the project is located.

The project site is located within an approximately 95-acre industrial zoned area in the unincorporated area of Santa Paula, commonly referred to as the "Mission Rock Road Community". The surrounding development consists of industrial uses to the east and south (i.e., oil/gas production facility, auto salvage and wrecking yards, and contractor's service and storage yards), and agricultural crop production to the north and west of the project site. The agricultural and industrial interface has existed since the 1950s. There is a two-story residence located on an approximately 13,000-sq. ft. parcel on agriculturally zoned land situated adjacent to and southwest of the project site. Ventura County Building and Safety Division permit records indicate that this residence was constructed in 2009. Single-family dwellings in and around the industrial area are sparse and consist mostly of on-site caretaker dwellings for the supervision of the industrial yards and businesses in the area.

The project site is located within the General Industrial Zone, 10,000-sq. ft. minimum lot size ("M3 – 10,000-sq. ft.") with a General Plan Designation of Industrial. The proposed project will encompass a total of 6.56 acres. The project parcel size meets the minimum lot size of the General Industrial Zone. The proposed use is consistent with the intent of the M3 Zone and is an allowed use in this zone, pursuant to NCZO section 8105-5.

The predominant architectural style within the Mission Rock Road Community is metal warehousing and prefabricated/modular buildings. The proposed project includes a request to install four modular buildings that will include a neutral-color exterior finish which is consistent with NCZO section 8109-3.4.1, which requires that the buildings in the M3 Zone have "exterior surfaces constructed or faced with a stainless steel, aluminum, painted, baked enamel, or similarly finished surface." Thus, the architectural style of the

proposed buildings is found to be consistent with the existing industrial community and the regulations of the NCZO.

The proposed project will be conditioned to require adequate off-street parking and loading facilities, adequate buffering, setbacks and landscaping in order to minimize adverse impacts related to noise, glare and odors on adjoining non-industrial zoned properties (i.e., adjacent agricultural operations). Therefore, with the implementation of specific conditions of approval to address these issues (site maintenance, facility component painting, operating hours, fugitive dust control, and landscaping), the proposed project will be developed consistent with the standards established for the General Industrial Zone and applicable General Plan Policies, the existing development on the surrounding properties, and the character of the community.

Based on the above discussion, there are no project-specific or cumulative impacts related to community character.

25b. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 25 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
26. Housing (Plng.)								
Will the proposed project:								
a) Eliminate three or more dwelling units that are affordable to: • moderate-income households that are located within the Coastal Zone; and/or, • lower-income households?	X				X			
b) Involve construction which has an impact on the demand for additional housing due to potential housing demand created by construction workers?		X				X		
c) Result in 30 or more new full-time-equivalent lower-income employees?		X				X		
d) Be consistent with the applicable General Plan Goals and Policies for Item 26 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
26a. Pursuant to the Ventura County Initial Study Assessment Guidelines, any project that will eliminate existing dwelling units will have an impact on the existing housing stock. There are no existing dwelling units on the project site and, thus, no dwelling units will be eliminated as a result of the proposed project. Therefore, there is no project-specific and cumulative impact on the existing housing stock.

26b. As stated in the Ventura County Initial Study Assessment Guidelines, any project that involves construction has an impact on the demand for additional housing due to potential housing demand created by construction workers. However, construction worker demand is a less than significant project-specific and cumulative impact because construction work is short-term and there is a sufficient pool of construction workers within Ventura County and the Los Angeles metropolitan regions.

26c. General Plan Policy 3.4.2-9 states, in part, that employment-generating discretionary development resulting in 30 or more new full-time and full-time equivalent employees shall be evaluated to assess the project's impact on lower-income housing demand within the community in which it is located or within a 15-minute commute distance of the project. The existing CUP authorized a total of 15 employees, but the information available indicates that the facility operated with 12 employees. The applicant proposes to permit an additional 25 employees from the 15 existing, permitted (or 28 additional employees above the baseline of 12 employees) for a total authorization for 40 full-time employees. The additional employees are deemed new. Since the proposed project will not result in 30 or more *new* full-time employees, the proposed project has a less than significant project-specific and cumulative impact on demand for housing.

26d. The proposed project is consistent with General Plan Goals and Policies for Item 26 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	**Project Impact Degree Of Effect****				**Cumulative Impact Degree Of Effect****			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(1). Transportation & Circulation - Roads and Highways - Level of Service (LOS) (PWA)								
Will the proposed project:								
a) Cause existing roads within the Regional Road Network or Local Road Network that are currently functioning at an acceptable LOS to function below an acceptable LOS?		X				X		

Impact Discussion:

27a(1)-a. The proposed project will not impact the nearest County-maintained road(s) because the Mission Rock Road community where the project is located is accessed from a state highway (i.e., Highway 126) and private roads (i.e., Briggs and Mission Rock Roads). Trucks that would travel to and from the project site will continue to be required as a condition of approval to adhere to the following truck route between Highway 126 and the project site: Highway 126 to Briggs Road, to Pinkerton Road, to Mission Rock Road, to the project site.

The Ventura County Public Works Agency (PWA), Roads and Transportation Department determined that the proposed project would generate an additional 99 ADT (Average Daily Trip) traffic on the Regional Road Network (RRN).

The existing CUP authorized a total of 15 employees, but the information available indicates that the facility operated with 12 employees. The applicant proposes to permit an additional 25 employees from the 15 existing, permitted (or 28 additional employees above the baseline of 12 employees) for a total authorization for 40 full-time employees. This equates to a representative baseline of 12 employee commuter vehicles per day (i.e., 24 ADT counting both the entrance and exit trips). The addition of 28 employees equates to 28 new vehicles per day (i.e., 56 ADT trips) for a total of 80 ADT (24 ADT (baseline) plus 56 ADT (new)). The difference between the total proposed employee vehicle trips (80 ADT) and the total baseline employee vehicle trips (24 ADT) equates to an increase of 56 ADT.

In addition, the proposed CUP allows a maximum of 500 delivery trucks per week (i.e.,1000 ADT, Monday-Saturday). Because the model requires input parameters in daily estimates, a daily truck trip average was calculated based on the weekly maximum of 1,000 ADT (500 trucks) divided by the operational days per week for truck trip deliveries (Monday-Saturday). This equates to a maximum daily average of 166.7 ADT, or 83.3 trucks per day. Based on the best available evidence (Attachment 8), the 2014 truck trips baseline is determined to be an average of 123.6 ADT trips per day (i.e., 61.8 trucks per day). The difference between the proposed maximum average truck trips per day (166.7 ADT) and the baseline (123.6 ADT) equates to an increase of 43 ADT (Attachment 8). Therefore, the overall increase in ADTs for both the employee vehicle trips and the delivery truck trips is 99 ADT.

The additional 99 ADT is less than the 110 ADT threshold for VMT (Vehicle Miles Traveled) analysis established by the Ventura County VMT Administrative Guidance. To address the cumulative adverse impacts of traffic on the Regional Road Network, Ventura County General Plan CMT-1.7 and Ventura County Ordinance Code, Division 8, Chapter 6 require that the VCPWA-RT collect a Traffic Impact Mitigation Fee (TIMF) from the Permittee for the proposed project prior to the issuance of a Zoning Clearance for Use Inauguration of the facility. The proposed project is subject to this Ordinance. With payment of the TIMF, the LOS of the existing roads will remain consistent with the County's General Plan. Additionally, the permittee will continue to be required as a

condition of approval to maintain a daily traffic log showing the number of vehicles that come and leave the project site and make the logs available to the County upon request to demonstrate that the facility does not exceed the proposed maximum number of trips identified in the proposed project.

The applicant prepared an On-Site Traffic and Queuing Plan (see Attachment 13) that requires a truck hauler to queue only within the project site and not along Mission Rock Road to prevent backed-up traffic and potential collisions on this private road. The project description and On-Site Traffic and Queuing Plan include a requirement that the waste haulers schedule appointments with the RI-NU facility prior to hauling waste to the facility to curtail queuing along Mission Rock Road.

The California Department of Transportation (Caltrans) reviewed the proposed project and the applicant's Traffic Generation Analysis, prepared by Associated Transportation Engineers, dated October 19, 2015, and updated on April 25, 2017, and determined that the project is not expected to result in a direct adverse impact to the existing state transportation facilities (Attachment 34).

Therefore, adverse traffic impacts relating to the level of service will be less than significant.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(2). Transportation & Circulation - Roads and Highways - Safety and Design of Public Roads (PWA)								
Will the proposed project:								
a) Have an Adverse, Significant Project-Specific or Cumulative Impact to the Safety and Design of Roads or Intersections within the Regional Road Network (RRN) or Local Road Network (LRN)?		X				X		

Impact Discussion:
27a(2)-a. The project site is adjacent to a private road, not a County-maintained road. The project, as proposed, does not have the potential to alter the level of safety of the nearest County-maintained road. Therefore, adverse traffic impacts relating to safety/design will be less than significant.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(3). Transportation & Circulation - Roads & Highways – Safety & Design of Private Access (VCFPD)								
a) If a private road or private access is proposed, will the design of the private road meet the adopted Private Road Guidelines and access standards of the VCFPD as listed in the Initial Study Assessment Guidelines?	X				X			
b) Will the project be consistent with the applicable General Plan Goals and Policies for Item 27a(3) of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
27a(3)-a. The private road access to the project site is existing and meets the adopted Private Road Guidelines and access standards of the VCFPD. Thus, there are no private road access impacts.

27a(3)-b. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 27a(3) of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(4). Transportation & Circulation - Roads & Highways - Tactical Access (VCFPD)								
Will the proposed project:								
a) Involve a road or access, public or private, that complies with VCFPD adopted Private Road Guidelines?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 27a(4) of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
27a(4)-a. No new private roads are proposed. There are public and private roads serving the project site. All of these roads are in full compliance with the County Public Road Standards and/or VCFPD Private Road Standards, as applicable.

27a(4)-b. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 27a(4) of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27b. Transportation & Circulation - Pedestrian/Bicycle Facilities (PWA/Plng.)								
Will the proposed project:								
1) Will the Project have an Adverse, Significant Project-Specific or Cumulative Impact to Pedestrian and Bicycle Facilities within the Regional Road Network (RRN) or Local Road Network (LRN)?		X				X		
2) Generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 27b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
27b-1. and 27b-2. The road fronting the project site (i.e., Mission Rock Road) is a private road and, thus, not within the RRN or LRN. Additionally, due to the nature and location of the project, it is unlikely that any customers or employees of the facility will arrive via alternative travel modes, such as by bicycle or walking. Therefore, adverse traffic impacts relating to the addition of pedestrians and bicycles will be less than significant.

27b-3. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 27b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27c. Transportation & Circulation - Bus Transit								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Substantially interfere with existing bus transit facilities or routes, or create a substantial increase in demand for additional or new bus transit facilities/services?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27c of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
27c-1. There are no bus systems that are directly affected by the proposed project. The proposed project will not have any impacts on existing bus activities.

27c-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 27c of Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27d. Transportation & Circulation – Railroads								
Will the proposed project:								
1) Individually or cumulatively, substantially interfere with an existing railroad's facilities or operations?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27d of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
27d-1. According to the Initial Study Assessment Guidelines, a project would normally have a significant impact on a railroad if it would individually or cumulatively substantially interfere with an existing railroad's facilities. The project site is not accessed by crossing over a railroad grade or any railroad access easements. Thus, the proposed project will have no impact on a railroad facility or operation.

27d-2. The proposed project is in consistent with the applicable General Plan Goals and Policies for Item 27d of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27e. Transportation & Circulation – Airports (Airports)								
Will the proposed project:								
1) Have the potential to generate complaints and concerns regarding interference with airports?	X				X			
2) Be located within the sphere of influence of either County operated airport?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 27e of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27e-1. and 27e-2. There are four airports in Ventura County which include County-owned and operated airports at Camarillo and Oxnard, a private airport at Santa Paula and the federal Point Mugu Naval Air Station and runway at San Nicholas Island. The Santa Paula Airport is located within the city limits of the City of Santa Paula and is 3.9 miles west of, and the closest airport to, the project site. According to the Planning Division GIS data layer, the proposed project is not located within the sphere of influence of a County-owned or privately-owned airport. Furthermore, the proposed project does not include the construction of buildings or structures that exceed the Industrial zone height limits or an incompatible use, such as a church, school, and residential units. Thus, the proposed project will not have an impact on Ventura County airport operations.

27e-3. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 27e of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27f. Transportation & Circulation - Harbor Facilities (Harbors)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Involve construction or an operation that will increase the demand for commercial boat traffic and/or adjacent commercial boat facilities?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27f of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27f-1. The proposed project is located within the non-coastal area of Ventura County and is not located adjacent to any harbor, will not affect the operations of a harbor in any way, or increase the demands on harbor facilities. Thus, the proposed project will have no impact on a harbor.

27f-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 27f of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27g. Transportation & Circulation – Pipelines								
Will the proposed project:								
1) Substantially interfere with, or compromise the integrity or affect the operation of, an existing pipeline?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27g of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27g-1. According to the Initial Study Assessment Guidelines, a project would have a significant impact if it would substantially interfere with, or compromise the integrity or affect the operation of, an existing pipeline used for the transportation of petroleum, petroleum products, natural gas, etc. The Planning Division GIS data layer indicates that there are no such pipelines that intersect the project site and, thus, the proposed project is not expected to create impacts to any existing oil and gas pipelines. Therefore, the proposed project will have no adverse impacts to natural gas or petroleum pipelines.

27g-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 27g of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
28a. Water Supply – Quality (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 28a of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 28a of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

28a-1. Domestic water service for the existing CUP boundary area is provided by the City of Santa Paula, a public water system. The City of Santa Paula confirmed that there is an existing 1.5-inch meter (Meter #11314216) at the project site, with service initiated on May 31, 1996. A Conditional Water Will Serve Letter (see Attachment 27), dated March 15, 2021, explains that the City of Santa Paula has sufficient resources to supply potable water to the proposed project. A final Will Serve Letter will be provided to the applicant upon satisfaction of the conditions outlined in the 2021 Conditional Will Serve Letter and shall be submitted to the Planning Division prior to the issuance of a Zoning Clearance for Construction.

The City of Santa Paula's source of water is 100 percent groundwater, pumped from the Santa Paula Basin. The City of Santa Paula Water System is regulated and permitted by the California State Water Resources Control Board, Division of Drinking Water (permit number CA5610011), and has an approved Urban Water Management Plan with the California Department of Water Resources. Since domestic water is being provided by an approved water purveyor (i.e., City of Santa Paula), the proposed project will not have an adverse impact on water quality.

28a-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 28a of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
28b. Water Supply – Quantity (WPD)								
Will the proposed project:								
1) Have a permanent supply of water?		X				X		
2) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that will adversely affect the water supply - quantity of the hydrologic unit in which the project site is located?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 28b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

28b-1. Water supply for the existing facility is currently provided by the City of Santa Paula by means of an existing 1.5-inch meter (Meter No. 11314216) as verified by the City of Santa Paula. The City of Santa Paula will continue to provide a permanent supply of domestic water to the project site. The City of Santa Paula is an Urban Water Purveyor with an approved Urban Water Management Plan with the State of California. Because the proposed project includes the expansion of the facility's operational boundary by 1.67 acres (the facility's operational boundary will encompass a total of 6.56 acres) and new structures with plumbing are proposed, the City of Santa Paula provided a Conditional Water Will Serve Letter (see Attachment 27), dated March 15, 2021, that includes a list of conditions to be satisfied prior to the issuance of a final Water Will Serve Letter for the proposed project. The letter indicates that the City of Santa Paula has sufficient resources to supply potable water to the proposed project. As a condition of approval, the applicant will be required to satisfy the conditions of the Conditional Water Will Serve Letter and obtain a final Water Will Serve Letter from the City of Santa Paula prior to the issuance of a Zoning Clearance for Construction. According to the Ventura County Initial Assessment Guidelines, a source of water supplied by a city is determined to constitute a permanent supply of water. Therefore, there will be a less than significant impact resulting from the requirement that each legal parcel requiring a domestic water source have a permanent supply of water for the proposed project.

28b-2. Implementation of the proposed project will result in an estimated reduction of 4.0 AFY from average historical water use as evidenced in a letter from the applicant, dated January 22, 2018 and updated on January 4, 2019. The proposed project will not, either individually or cumulatively when combined with recently approved, current, and

reasonably foreseeable probable future projects, introduce physical development that will adversely affect water supply quantity. Thus, the proposed project will have a less than significant impact on water supply quantity.

28b-3. The proposed project is consistent with the applicable General Plan and Policies for Item 28b of the Initial Study Assessment Guidelines and is considered to have a less than significant impact on water supply quantity.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
28c. Water Supply - Fire Flow Requirements (VCFPD)								
Will the proposed project:								
1) Meet the required fire flow?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 28c of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

28c-1. The proposed project is served water by a public water system, the City of Santa Paula, that provides the required fire flow in accordance with Ventura County Waterworks Manual and the VCFPD Fire Code. Therefore, the proposed project will not have an adverse impact on fire flow.

28c-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 28c of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29a. Waste Treatment & Disposal Facilities - Individual Sewage Disposal Systems (EHD)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Comply with applicable state and local requirements as set forth in Section 29a of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 29a of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
29a-1. The project site is located in an area without access to public sewer service. The existing facility had an Onsite Wastewater Treatment System (OWTS) (i.e., septic system) that was abandoned in October 2013, in anticipation of connecting proposed restrooms to the 12-mile sewer discharge pipeline to the City of Oxnard's Waste Treatment Plant, approved pursuant to Major Modification LU06-0011. However, connecting the restrooms to the sewer line was never completed since no buildings with restrooms were ever built to require a connection. Since the abandonment of the septic system in 2013, porta-potties were used as a means of sewage disposal for its employees.

Since the proposed project eliminates the use of the 12-mile sewer discharge line, the applicant proposes to install a new septic system (OWTS) for domestic waste generated by the facility's employees and operations (not including the domestic waste streams received by hauling trucks which are transported offsite at a proper disposal facility). On November 9, 2020, the applicant submitted documentation to demonstrate feasibility for installing a septic system on the parcel referred to as "Lot 5." Included in this submittal was: a soils engineering report with percolation test data, proposed septic system design consisting of one 1,000-gallon septic tank, leach lines and 100 percent expansion area, and a site plan depicting the location of the proposed septic system. Feasibility for the installation of a septic system has been demonstrated under current OWTS regulations and requirements administered by EHD. Conformance with the Ventura County Building Code, State OWTS policy, and EHD guidelines, as well as proper routine maintenance of OWTS, will reduce any project specific and cumulative impacts to a level of less than significant.

29a-2. The proposed project includes a request to install a new septic system and EHD has determined feasibility of the septic system at the project site. For this reason, the proposed project is consistent with the applicable General Plan Goals and Policies for Item 29a of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29b. Waste Treatment & Disposal Facilities - Sewage Collection/Treatment Facilities (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29b of the Initial Study Assessment Guidelines?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 29b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

29b-1. The proposed project includes the elimination of the use of the existing 12-mile sewer pipeline connected to the City of Oxnard's Wastewater Treatment Plant as a means of disposal of various non-hazardous domestic, commercial, and industrial waste streams received from off-site generators and treated by the existing wastewater treatment facility. A condition of approval will require the applicant to sufficiently plug/cap-off the existing sewer discharge line at the source on the property prior to the issuance of a Zoning Clearance for Use Inauguration. The proposed facility will not be connected to, or be required to connect to, a public sewer facility in order to operate the wastewater treatment facility. The applicant proposes to solely truck offsite for proper disposal the various non-hazardous waste streams. The applicant proposes to install an on-site septic system (OWTS) to be connected to the restrooms at the facility. The applicant requests to install permanent restrooms, including a lavatory faucet, sink, and emergency shower use on the property. Discharges to the on-site septic system will be limited to water from hand wash sinks and discharges from bathrooms. Signage will be posted next to the sinks in the laboratory warning employees not to dispose of laboratory chemicals or wastewater down the hand wash sink or toilet in the restroom. The laboratory sinks will be discharged to a tank contained below or adjacent to the laboratory building or to a poly collection container located directly under the sink. The wastewater will be transferred to a larger spill contained waste collection tank or drum. When the waste collection tank or drum is nearing capacity, the contents will be analyzed to determine if the waste is hazardous waste or not. Depending on the laboratory results, the wastewater will be manifested and sent offsite to an appropriate receiving disposal facility if considered a hazardous waste or will be treated on site in the facility's treatment system if it is considered non-hazardous waste.

Off-site receiving disposal facilities are governed by state and federal regulations and are either existing private, commercial facilities or public facilities permitted to accept, treat, and dispose of the types of wastes to be shipped from the project site. All of the off-site

receiving disposal facilities require incoming waste streams meet EPA/DTSC criteria for non-hazardous waste. The Planning Division's environmental consultant, Dr. Tormey, reviewed the general waste acceptance criteria of potential off-site receiving disposal facilities and determined that the type of wastes to be shipped from the project site met applicable waste acceptance criteria, although some facilities only accept certain types of waste. The new operator will be required as a condition of approval of the subject modification to obtain a LAFCo-approved OASA for off-site trucking of wastewater to any public facility prior to the issuance of a Zoning Clearance for Construction of the facility.

The proposed project is designed to meet all applicable federal, state, and local requirements pertaining to the operation of a wastewater treatment facility. Additionally, the associated equipment and structures will be reviewed for conformance with the California Plumbing Code and the Ventura County Building Code prior to issuance and final sign-off of a Building Permit.

Based on the reasons provided above, the proposed project will have a less than significant project-specific or cumulative impact in this environmental area.

29b-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 29b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29c. Waste Treatment & Disposal Facilities - Solid Waste Management (PWA)								
Will the proposed project:								
1) Have a direct or indirect adverse effect on a landfill such that the project impairs the landfill's disposal capacity in terms of reducing its useful life to less than 15 years?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 29c of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

29c-1. As required by PRC § 41701, Ventura County's Countywide Siting Element (CSE), adopted in June 2001 and updated annually, confirms Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Because the County currently exceeds the minimum disposal capacity required by the PRC, the

proposed project will have a less than a significant impact on Ventura County's solid waste disposal capacity.

29c-2. Ventura County Ordinance No. 4421 requires all discretionary permit applicants whose proposed project includes construction and/or demolition activities to reuse, salvage, recycle, or compost a minimum of 60% of the solid waste generated by their project. The Integrated Waste Management Division's waste diversion program (Form B Recycling Plan/Form C Report) ensures this 60% diversion goal is met prior to issuance of a final Zoning Clearance for use inauguration or occupancy, consistent with the Ventura County General Plan's Waste Treatment and Disposal Facility Goals 4.4.1-1 and -2 and Policies 4.4.2-1, -2, and -6. Therefore, the proposed project is consistent with the applicable General Plan Goals and Policies for Item 29c of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29d. Waste Treatment & Disposal Facilities - Solid Waste Facilities (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29d of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 29d of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
29d-1. The proposed project does not involve a solid waste operation or facility. Therefore, the proposed project will have no adverse impact relating to solid waste operations or facilities.

29d-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 29d of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
30. Utilities								
Will the proposed project:								
a) Individually or cumulatively cause a disruption or re-routing of an existing utility facility?		X				X		
b) Individually or cumulatively increase demand on a utility that results in expansion of an existing utility facility which has the potential for secondary environmental impacts?		X				X		
c) Be consistent with the applicable General Plan Goals and Policies for Item 30 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
30a. and 30b. The existing facility is already served by existing utility facilities.

Electrical
The existing facility is already served by Southern California Edison's existing electrical system. The proposed project will not cause a disruption or re-routing of an existing utility facility or increase demand on a utility that results in expansion of an existing utility facility which has the potential for secondary environmental impacts. Thus, the proposed project will have no impact on an existing electrical facility.

Gas
The existing facility is already served by Southern California Gas Company's existing natural gas transmission system. Thus, the proposed project will have a less than significant impact on gas facilities since the natural gas transmission facility already exists within the project area.

30c. The proposed project is consistent with applicable General Plan Goals and Policies for Item 30c of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
31a. Flood Control Facilities/Watercourses - Watershed Protection District (WPD)								
Will the proposed project:								
1) Either directly or indirectly, impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk for flood hazards?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 31a of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

31a-1. The project site is located immediately adjacent to, and south and east of Cummings Road Drain, which is a Ventura County Watershed Protection District (WPD) jurisdictional redline channel. No direct drainage connections to Cummings Drain are proposed or indicated as part of the proposed project.

The proposed project would result in an increase of impervious area within the subject property and there has been an unpermitted facility expansion that added 26,335 sq. ft. of impervious surface. Impacts from increases in impervious area will be required to be mitigated to less than significant under conditions imposed by the Engineering Services Department, Development and Inspection Services. These conditions will be based on Appendix J of the Ventura County Building Code. Appendix J requires that runoff from the site will be released at no greater than the undeveloped flow rate in such a manner as to not cause an adverse impact downstream in velocity or duration.

WPD Ordinance WP-2 states that a project cannot impair, divert, impede or alter the characteristics of the flow of water running in any jurisdictional redline channel or facility. To the extent a proposed project impacts WPD channels and facilities, compliance with WPD's standards is required. In such cases, engineering studies should verify compliance with District hydrology data and flood studies. In addressing peak attenuation, stormwater runoff after development must not exceed the peak flow under existing conditions for any frequency of event; any additional flow (peak, volume) must be contained on the site. Further, any development activity including drainage connections and site grading that is proposed in, on, over, under, or across overflow any jurisdictional redline channel or facility including the bed, banks, and overflow areas will require a permit from the WPD.

WPD staff finds that the project design along with the recommended conditions mitigates the direct and indirect project-specific and cumulative impacts to flood control facilities and watercourses. Thus, the impacts on flood control facilities and watercourses are less than significant.

31a-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 31a of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
31b. Flood Control Facilities/Watercourses - Other Facilities (PWA)								
Will the proposed project:								
1) Result in the possibility of deposition of sediment and debris materials within existing channels and allied obstruction of flow?		X				X		
2) Impact the capacity of the channel and the potential for overflow during design storm conditions?		X				X		
3) Result in the potential for increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on and off site?		X				X		
4) Involve an increase in flow to and from natural and man-made drainage channels and facilities?		X				X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 31b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:
31b-1. and 31b-2. The proposed project does not include any alterations to the project's overall ground surface elevation. Portions of the area within the project site will be constructed with containment berms, but the overall drainage patterns will remain. The project components will preserve the existing trend of runoff and local drainage patterns. The project runoff will be maintained in the present condition. The project will not create an obstruction of flow in the existing drainage as any runoff will be similar to the present conditions. The proposed project will not have an impact on the capacity of the channel or increase the potential for channel overflow during design storm conditions. Thus, the

proposed project will have less than significant direct and indirect project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact to drainage facilities not owned by the WPD.

31b-3. The project runoff will be similar to the present flow and no increase in effects on Areas of Special Flood Hazard will occur greater than the pre-project conditions. The proposed project will have less than significant direct and indirect project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact to drainage facilities not owned by the WPD.

31b-4. The impervious surface areas will drain into existing improved areas. The existing drainage conditions will be similar, and runoff will be returned to the existing drainage system. The proposed project will have less than significant direct and indirect project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact to drainage facilities not owned by the WPD.

31b-5. The impervious surface areas will drain into existing improved areas. The existing drainage conditions will be similar, and runoff will be returned to the existing drainage system. As a recommended condition of approval, the Permittee will be required to submit drainage plans and hydraulic calculations to ensure runoff is discharged in accordance with the Ventura County Building Code, the Ventura County Public Works Agency, WPD, and national and state standards, prior to the issuance of a Zoning Clearance for Construction. Therefore, because the project components will be developed in accordance with current codes and standards, and with the implementation of the condition of approval (i.e., drainage plans and hydraulic calculations), the proposed project will have a less than significant impact on drainage facilities not under the jurisdiction of the WPD.

Mitigation/Residual Impact(s): No mitigation required. Impacts are less than significant.

Issue (Responsible Department)*	**Project Impact Degree Of Effect****				**Cumulative Impact Degree Of Effect****			
	N	LS	PS-M	PS	N	LS	PS-M	PS
32. Law Enforcement/Emergency Services (Sheriff)								
Will the proposed project:								
a) Have the potential to increase demand for law enforcement or emergency services?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 32 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

32a. According to the Initial Study Assessment Guidelines, the proposed wastewater treatment facility is not listed as a project that would have the potential to increase demand for law enforcement or emergency services. Therefore, this project will not have project-specific or cumulative impacts on law enforcement or emergency services due to the type of use proposed. Although the proposed project will not cause a demand on law enforcement or emergency services, adequate security measures have been incorporated into the project to address potential theft, vandalism, and disturbances that could affect public safety in the surrounding area. Security is provided by a six-foot tall perimeter metal fence, security video, and 24-hour on-site operating personnel. Additionally, as a proposed mitigation measure related to hazardous waste/materials handling (Item 20a) and due to the fire and explosion that occurred on the property in 2014, the Permittee will be required to hold annual tabletop response drills at the facility for first responders with participation by facility employees and contractors. This will reduce the risk posed by the operations of the wastewater treatment facility to the public by adequately apprising first responders about the risks posed by on-site chemical storage, chemical handling procedures, on-site equipment, and the processes required to abate hazardous conditions. Based on this discussion, the proposed project will have no adverse impact on law enforcement or emergency service.[42]

32b. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 32b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
33a. Fire Protection Services - Distance and Response (VCFPD)								
Will the proposed project:								
1) Be located in excess of five miles, measured from the apron of the fire station to the structure or pad of the proposed structure, from a full-time paid fire department?	X				X			

[42] Refer to Section B, Items 20(a) and (b) of this initial study for a detailed discussion of the proposed project's domestic, and commercial and industrial waste handling, storage, and processing activities which could cause a potential impact on the environment and humans and result in calls for service to the Ventura County Sheriff's Office and the VCPD. Proposed mitigation to reduce those impacts to a less than significant level have been recommended.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2) Require additional fire stations and personnel, given the estimated response time from the nearest full-time paid fire department to the project site?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 33a of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
33a-1. and 33a-2. The project site is within five miles of a full-time paid Ventura County Fire Station. Ventura County Fire Station No. 26 is approximately three miles from the proposed project and is located at 12391 West Telegraph Road, Santa Paula. No new fire station or personnel will be required. Thus, the proposed project will not have an impact on distance and response time from a full-time paid fire.

33a-3. The proposed project is consistent with applicable General Plan Goals and Policies for Item 33a of Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
33b. Fire Protection Services – Personnel, Equipment, and Facilities (VCFPD)								
Will the proposed project:								
1) Result in the need for additional personnel?	X				X			
2) Magnitude or the distance from existing facilities indicate that a new facility or additional equipment will be required?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 33b of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:
33b-1. and 33b-2. A new fire station, additional personnel, or equipment will not be required to serve the proposed project. Thus, the proposed project will have no impact on fire personnel, equipment and facilities.

33b-3. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 33b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
34a. Education – Schools								
Will the proposed project:								
1) Substantially interfere with the operations of an existing school facility?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 34a of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

34a-1. The proposed project is not a residential project or located adjacent to school facilities. The nearest school (Briggs School) is located approximately 900 feet north of Highway 126 at 14438 W. Telegraph Road, Santa Paula, and is approximately 0.69 miles (over one-half mile) from the project site. The project site is located on the south side of Highway 126 within the approximately 99-acre industrial zone, known as Mission Rock Road Community. Due to the project site located more than one-half a mile from the nearest school facilities (Attachment 35), a potential noise or traffic safety issue to a nearby school has not been identified. Based on the methodology set forth in the Initial Study Assessment Guidelines, the proposed project would not have an impact on the demand for schools or on school facilities operations.

34a-2. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 34a of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
34b. Education - Public Libraries (Lib. Agency)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Substantially interfere with the operations of an existing public library facility?	X							
2) Put additional demands on a public library facility which is currently deemed overcrowded?	X							
3) Limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes?	X							
4) In combination with other approved projects in its vicinity, cause a public library facility to become overcrowded?					X			
5) Be consistent with the applicable General Plan Goals and Policies for Item 34b of the Initial Study Assessment Guidelines?	X							

Impact Discussion:
34b-1. and 34b-2. The proposed project is not a residential project and will have no impact on the demand for libraries. Additionally, the project is not located in the vicinity of a public library and will have no impact on the operations of an existing library facility.

34b-3. The project site is located within a 99-acre industrial zone and not in the immediate vicinity of a library. The proposed project will not limit the ability of individuals to access public library services.

34b-4. The proposed project is not a residential project or located adjacent to a public library and, therefore, will not cause a public library to become overcrowded.
34b-5. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 34b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): No mitigation required. No impact identified.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
35. Recreation Facilities (GSA)								
Will the proposed project:								
a) Cause an increase in the demand for recreation, parks, and/or trails and corridors?	X				X			

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
b) Cause a decrease in recreation, parks, and/or trails or corridors when measured against the following standards: • Local Parks/Facilities - 5 acres of developable land (less than 15% slope) per 1,000 population; • Regional Parks/Facilities - 5 acres of developable land per 1,000 population; or, • Regional Trails/Corridors - 2.5 miles per 1,000 population?	X				X			
c) Impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors?	X				X			
d) Be consistent with the applicable General Plan Goals and Policies for Item 35 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

35a. through 35c. A project will have a significant impact with regard to recreational facilities if it will cause an increase in the demand for recreational facilities or impede future development of recreation parks and facilities or regional trails and corridors. The proposed project will not involve a use that will increase the population and create a corresponding demand for recreational facilities and will not impede the future development of local park facilities. The proposed project will not generate additional residents or cause an increase in the demand for recreational facilities. The proposed project will not have a project-specific impact to recreational facilities and will not make a cumulatively considerable contribution to a significant cumulative recreational facilities impact.

35d. The proposed project is consistent with the applicable General Plan Goals and Policies for Item 35a of the Initial Study Assessment Guidelines.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
36. Energy (Plng)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?		X				X		
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	X				X			

Impact Discussion:

36a. The proposed project would not have a substantial impact on energy consumption or conservation. The project would not increase consumption or inefficient energy use. Construction equipment and haul trucks would consume fuel during the construction process, but the site's relatively small size and relative lack of grading would minimize the energy consumed.

During operations, the project would require fuel for vehicles and equipment used by site maintenance workers. A minimal amount of electricity is required for operation of the facility and the project's electricity demand would not constitute a wasteful, inefficient, or unnecessary use of energy. The applicant proposes to remove older model equipment and replace them with newer, more energy efficient equipment that reduces energy consumption and increases the efficiency of energy production. The facility will no longer use a combination of discharging wastes to the 12-mile on-site sewer line connected to the City of Oxnard's Waste Water Treatment Plant and haul-off wastes to off-site receiving facilities. Instead, the facility would solely truck wastes off-site. The facility would treat and consolidate the wastes onsite and then load them into larger hauling vehicles as opposed to sending out multiple smaller haul trucks to the off-site receiving facilities. This practice would minimize the energy consumed during operations. Potential impacts on base or peak energy demand would be less than significant.

36b. The proposed project would not conflict with a state or local plan for renewable energy or energy efficiency. Therefore, no impacts are expected to occur.

Mitigation/Residual Impact: No mitigation required. Less than significant impacts identified.

Section C – Mandatory Findings of Significance

Based on the information contained within Section B:		
	Yes	**No**
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		X
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).		X
3. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant.)		X
4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X

Findings Discussion:

1. No. The subject property consists entirely of developed industrial facilities and contains no areas capable of supporting special status plants, rare or endangered plants or animals, and would not eliminate important examples of California history.

2. No. The project will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.

3. No. The project will not have impacts that are individually limited, but cumulatively considerable.

4. No. Specific actions recommended by Ensafe, as shown in the RMA, as well as actions identified in Dr. Tormey's September 6, 2018 Technical Memoranda will be implemented in a series of plans and incorporated as mitigation measures/conditions of approval of the project in order to reduce the potential significant impact on the environment and human health and safety to a level of less than significant. The series of plans include the following: (1) Risk

Management Plan; (2) Training Plan; (3) Operating and Maintenance Plan; and (4) Annual Spill Drill Plan.

The Ventura County Agricultural Commissioner's Office has also recommended mitigation measures to reduce the potential impacts from the proposed wastewater treatment facility on adjacent agricultural operations to a less than significant level. Since the proposed wastewater treatment facility is located closer than the threshold distances set forth in Section 5b.C of the Ventura County Initial Study Assessment Guidelines, the proposed project would cause potentially significant impacts on adjacent agricultural operations. Therefore, as mitigation measures, the Permittee will be required to prepare a landscape buffer and vegetative screening plan in accordance with the Ventura County Landscape Design Criteria and the Agricultural/Urban Buffer Policy, prepare and implement a Notification and Response Plan, and control fugitive dust by adhering to specific requirements during dust-producing activities and during times of high winds. The Permittee will be required to implement these measures for the life of the operation of the wastewater treatment facility so that any potential adverse impacts on agricultural operations located within 300 feet of the facility are minimized.

With the implementation of the foregoing mitigation measures and all of the recommended conditions of approval, the proposed project will have a less than significant impact on human beings, either directly or indirectly.

Section D – Determination of Environmental Document

Based on this initial evaluation:

[ ]	I find the proposed project **could not** have a significant effect on the environment, and a **Negative Declaration** should be prepared.
[X]	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measure(s) described in Section B, Items 5B and 20A, of the Initial Study will be applied to the project. A **Mitigated Negative Declaration** should be prepared.
[ ]	I find the proposed project, individually and/or cumulatively, MAY have a significant effect on the environment and an **Environmental Impact Report** (EIR) is required.
[ ]	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

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

Franca A. Rosengren, Senior Planner — 10/11/2021 Date

Attachments:

Attachment 1 Aerial Map of Project Site
Attachment 2 General Plan Land Use and Zoning Designation Map
Attachment 3 February 27, 2015 SCWW Root Cause Investigative Report
Attachment 4 January 30, 2018 SCWW EUA Final Report, sans Appendices
Attachment 5 Notice of Violation PV15-0020
Attachment 6 Notice of Noncompliance PV15-0020
Attachment 7 Risk Management Analysis
Attachment 8 SCWW Daily Log Summary 2014
Attachment 9 Planning Director Equivalency Determination
Attachment 10 Waste Streams Process Flow Diagrams
Attachment 11 Proposed Site Plan
Attachment 12 Proposed Floor and Elevation Plans
Attachment 13 On-site Traffic and Queuing Plan
Attachment 14 Conceptual Landscape and Planting Plan
Attachment 15 Proposed Lighting Plans
Attachment 16 Proposed Sign Plan and Summary
Attachment 17 Map Used in the Cumulative Impacts Analysis – Unincorporated County Projects
Attachment 18 Proposed Odor Minimization Plan
Attachment 19 Proposed Operations and Maintenance (O&M) Manual
Attachment 20 Proposed Dust Control Plan
Attachment 21 Ventura County Growth and Non-Growth Areas, Figure 4-1
Attachment 22 Operational Air Emissions Modeling Report GHG
Operational Air Emissions Modeling Report ROGNOx
Attachment 23 Construction Air Emissions Modeling Report GHG
Construction Air Emissions Modeling Report ROGNOx
Attachment 24 RI-NU's Table of Estimated Tank Bottoms
Attachment 25 APCD Air Toxics Review of Permit Applications
Attachment 26 APCD TAC Analysis
Attachment 27 Conditional Water Will Serve Letter, dated March 2021
Attachment 28 Proposed Spill Prevention, Control, and Countermeasure (SPCC) Plan

Attachment 29	September 6, 2018 Technical Memorandum
Attachment 30	Safety Handbook
Attachment 31	Waste Analysis Plan
Attachment 32	Noise Impact Assessment
Attachment 33	County of Ventura Construction Noise Threshold Criteria and Control Plan
Attachment 34	October 19, 2015 and April 25, 2017 Trip Generation Analysis
Attachment 35	One-Fourth Mile Radius Map of Nearest School Facilities
Attachment 36	Works Cited