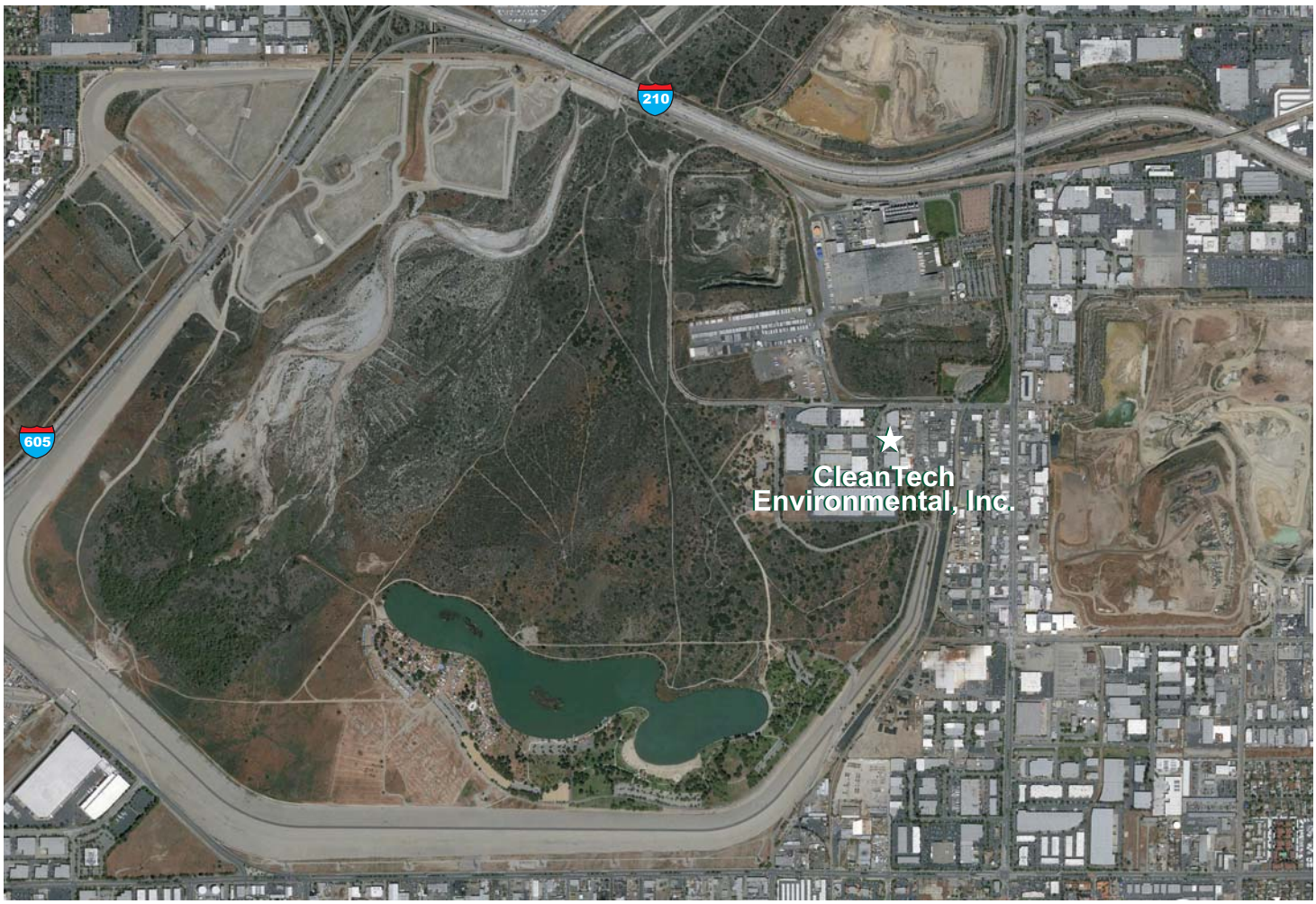
Draft Supplemental Environmental Impact Report

for the

CleanTech Environmental, Inc. Hazardous Waste Facility Permit

California Department of Toxic Substances Control

SCH #2011111065



Prepared for:

California Department of Toxic Substances Control
Office of Permitting

700 Heinz Avenue, Suite 200
Berkeley, CA 94710

September 2016

Contents

1. Introduction **1**
1.1 SEIR Purpose 1
2. Cumulative Impacts Analysis **2**
2.1 CEQA Requirements 2
2.2 Cumulative Impact Analysis Methodology 3
2.2.1 Methodology Update 3
2.3 Projects Considered in the Cumulative Impact Analysis 5
2.4 Cumulative Impact Analysis 9
2.4.1 Air Quality and Climate Change 10
2.4.2 Biological Resources 11
2.4.3 Cultural and Paleontological Resources 12
2.4.4 Hazards and Hazardous Materials 12
2.4.5 Hydrology and Water Quality 12
2.4.6 Noise 13
2.4.7 Transportation 14
2.4.8 Effects Found Not to be Significant 17
2.5 Summary 17
3. References **18**

Figure 2-1 Cumulative Projects **6**
Table 2-1 Cumulative Projects Within Two Miles of Project **7**

1. Introduction

Pursuant to the California Environmental Quality Act (CEQA), the State Department of Toxic Substances Control (DTSC), acting in the capacity of Lead Agency, distributed a Draft Environmental Impact Report (EIR) (State Clearinghouse No.: 2011111065) for the CleanTech Environmental Hazardous Waste Facility Permit (Cleantech Project) for public review and comment in August 2014. The Final EIR was certified by DTSC in January, 2015.

In compliance with CEQA [Cal. Code Regs., tit. 14, §15163], DTSC has prepared a Supplemental EIR (SEIR) that amends and supplants its original cumulative impact analysis of the Cleantech Project. The Cleantech Project's updated cumulative impacts analysis includes an extended 2-mile cumulative project radius that includes the Athens Services Irwindale Materials Transfer Facility and Transfer Station Project (Athens Project). The City of Irwindale certified the FEIR for the Athens Project in June, 2016. The Athens Project was not specifically included in the original analysis for the CleanTech Project since it was beyond the original 1-mile radius that was analyzed in the EIR. This Draft SEIR has been prepared to augment that cumulative impact analysis.

Pursuant to the CEQA Guidelines [Cal. Code Regs., tit. 14, §15163(c)], a public notice was provided regarding the notice of preparation (NOP) to elicit public and agency comment prior to the completion of the Draft SEIR and a public notice has been provided regarding the notice of completion (NOC) of this Draft SEIR. The NOP public notice and 30-day comment period was initiated on August 6th and concluded on September 6th, 2016. The comments received during the NOP public comment period, as well as comments received previously on this Project, were used to help direct the scope of the analysis in the SEIR.

The 45-day public review and comment period on this Draft SEIR document was initiated on September 20, and will conclude on November 4, 2016. A Final SEIR will be prepared to address any comments received on the Draft SEIR. A Notice of Determination will be filed with the State of California Office of Planning and Research, State Clearinghouse after DTSC certifies the SEIR.

1.1 SEIR Purpose

The purpose of this SEIR is to address the issues identified in the Superior Court's decision in the case of *L.I.M.P.I.A. v. California DTSC of Toxic Substances Control* (BS 1555098). To that end, this SEIR:

- Provides additional support to explain the methodology used in the Draft EIR's original cumulative impacts analysis, including information supporting the 1-mile project radius that was selected and information explaining why the Athens Project was not included in the cumulative impact analysis for that original DEIR;
- Performs additional analysis of cumulative impacts of this Project using a larger project radius and specifically including analysis of the Athens Project;
- Concludes based on the additional information that the Project does not have the potential to cumulatively contribute to a significant environmental impact.

2. Cumulative Impacts Analysis

Section 2 presents the revised analysis used to analyze the potential cumulative impacts associated with the Project and performs the cumulative impacts analysis. To document the process used to determine cumulative impacts, this Supplement provides analyses of CEQA requirements (Section 2.1), the methodology used in the cumulative assessment (Section 2.2), and the projects identified and applicable to the cumulative analysis (Section 2.3). The analysis of cumulative impacts is presented by issue area in Section 2.4, below.

2.1 CEQA Requirements

Title 14, Chapter 3 of the California Code of Regulations (CCR) includes the CEQA Guidelines, which state that "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR." An EIR must discuss cumulative impacts if the incremental effect of a project, combined with the effects of other projects is "cumulatively considerable." Such incremental effects are to be "viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." Together, these projects comprise the cumulative scenario, which forms the basis of the cumulative impact analysis. (14 CCR §15130)

Cumulative impacts analysis should highlight past actions that are closely related either in time or location to the project being considered, catalogue past projects and discuss their impacts on the environment, and discuss past actions even if they were undertaken by another agency or another person. Both the severity of impacts and the likelihood of their occurrence are to be reflected in the discussion, "but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion of cumulative impacts shall be guided by standards of practicality and reasonableness, and shall focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact" (14 CCR §15130).

The analysis must be presented in sufficient detail to be useful to the decision maker in deciding whether, or how, to alter the program to lessen cumulative impacts. Most of the projects listed in the cumulative projects table (Table 2-1) have, are, or will be required to undergo their own independent environmental review under CEQA. Significant adverse impacts of the cumulative projects will be reduced, avoided, or minimized through the application and implementation of mitigation measures (MMs). The net effect of these MMs is assumed to be a general lessening of the potential for this project to make a considerable contribution to cumulative impacts.

There are two commonly used approaches, or methodologies, for establishing the cumulative impact setting or scenario. One approach is to use a "list of past, present, and probable future projects producing related or cumulative impacts." The other is to use a "summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact." (14 CCR §15130)

This SEIR uses the list approach to provide a tangible understanding and context for analyzing the potential cumulative effects of this Project. General plans and other planning documents were used as additional reference points in establishing the cumulative scenario for the analysis.

2.2 Cumulative Impact Analysis Methodology

The area within which a cumulative effect can occur varies by resource. For example, air quality impacts tend to disperse over a large area, while traffic impacts are typically more localized. For this reason, the geographic scope for the analysis of cumulative impacts must be identified for each resource area.

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of each analysis is based on the topography surrounding the Project and the natural boundaries of the resource affected, rather than jurisdictional boundaries. The geographic scope of cumulative effects will often extend beyond the scope of the direct effects, but not beyond the scope of the direct and indirect effects of the Project.

In addition, each project (see Table 2-1) has its own implementation schedule, which may or may not coincide or overlap with the Project's schedule. This is a consideration for short-term impacts from the Project. However, to be conservative, the cumulative analysis assumes that all projects in the cumulative scenario are built and operating during the operating lifetime of the Project.

2.2.1 Methodology Update

As noted above, the geographic scope for the analysis of cumulative impacts will be identified for each resource area. The original methodology used in the DEIR assumed that all issue areas could be evaluated using a cumulative project list developed by evaluating all projects within a 1-mile radius from the Project site. Geographic scope for cumulative analysis can be related to project size, with a larger project that poses greater impacts having a larger radius to appropriately capture the full range of impacts posed by the project. In the original EIR, the cumulative project list provided was limited to a 1-mile radius. A 1-mile radius was originally selected as appropriate for the following reasons:

- The local roadway impacts from the Project are limited by the Traffic Control Plan (Mitigation Measure TR-1.1) within a 0.7-mile radius of the Project site.
- The Project's air quality emissions during operation result from emissions from truck transportation and are large-scale regional impacts with only a small portion of the project emissions occur at or near the Project site. Therefore, for air quality impact analysis, a specific radius approach for the evaluation of cumulative impacts is not meaningful.
- Noise impacts are localized and dissipate quickly with distance, so only extremely large noise sources (such as airports) would have the potential for cumulative impacts beyond 0.25 mile.
- The other environmental issue areas were found to have extremely minimal Project impacts, supporting the conclusion that they cannot be considered cumulatively considerable regardless of the cumulative project radius evaluated.

The Project is a comparatively small project that generally will not have the potential to create new cumulative impacts or substantially contribute to significant cumulative impacts. The used oil throughput (1,500,000 gallons) is placed in its proper context by a comparison of the Project's trip generation and mass throughput statistics in comparison to other types of commercial and industrial projects and specific projects on the cumulative project list:

- Weekday trip generation rates for various small commercial projects (CAPCOA 2013):
  - 12-pump gasoline/service station, no convenience market – 1,953 trips/day
  - 5,000-square-foot bank with drive through – 741 trips/day
  - 2,500-square-foot convenience store, 24-hour – 1845 trips/day

- Trip generation and tonnage throughput rates for the proposed Athens Project and the nearby completed Waste Management Material Recovery Facility and Transfer Station Project (Waste Management MRF Project):
  - Athens Project – 3,897 increased trips per day (including 2,456 truck trips, 690 employee trips, 751 daily trips for the projects convenience store/service station) and 6,000 tons per day (Irwindale 2014).
  - Waste Management MRF project – 4,294 trips per day (4,056 truck trips and 138 employee trips) and 3,800 tons per day (Azusa 2011).
- The daily incremental trip generation rate and average daily tonnage throughput based on the maximum monthly throughput for the Project:
  - 80 trips per day (46 truck trips, 34 employee trips)
  - 175 tons per day (49,315 gallons per day)

As this information shows, the Project is a comparatively small project. The maximum daily increase in trip rates for the Project are substantially less than relatively small commercial projects and those maximum daily trips and daily tonnage throughput rates are a small fraction of those that would occur from the Athens Project and Waste Management MRF project.

This supplemental analysis includes analysis of the impacts of projects within a 2-mile cumulative project radius. This radius includes within it the Athens Project, which was certified in June 2016 (Irwindale 2016a). The Athens Project was identified in the original EIR's cumulative impact analysis, but was not included in the analysis because it was beyond the 1-mile radius evaluated. In addition, the original EIR for the Athens Project was decertified and the revised Draft EIR was not available during the preparation of the CleanTech Draft EIR. Additionally, the CleanTech Final EIR did not include analysis of the Athens Project because none of the Draft EIR comments raised the issue of the Athens Project.

The Waste Management MRF project in Azusa was operating at the time the CleanTech Draft EIR was completed; therefore, that project was considered as part of the baseline conditions, and the trips for that facility were included in the baseline local street traffic trips and in the background existing traffic noise. To avoid doubly counting these effects, that operating project is not considered again in this cumulative impacts analysis. This supplemental analysis has been edited to correct any inconsistencies and clarify that the effects of the Waste Management MRF project were included in the baseline conditions.

2.3 Projects Considered in the Cumulative Impact Analysis

In addition to the project list compiled in 2014 during preparation of the EIR, projects now added to the original project list were compiled through several methods, including directly requesting project information from the local jurisdictions, completing a search of CEQAnet Database (OPR 2016a) for projects listed since the original project NOP date of December 2013 that have undergone or are currently undergoing an environmental review process, and other means available to develop project lists from these jurisdictions. In addition, for the unincorporated areas of Los Angeles County within 2 miles of the Project site, including Vincent, a census-designated place (CDP), and Los Angeles County Parks and Recreation projects within the Santa Fe Dam Recreation Area (SFDRA), DTSC conducted a review of the County of Los Angeles Open Data Construction Permits Query Website (LA County 2016a) and the Department of Public Works Building Permit Viewer Website (LA County 2016b).

Project lists from the following jurisdictions surrounding the Project site were requested or separately obtained:

- The City of Irwindale
- The City of Azusa[1]
- The City of Baldwin Park
- The City of Duarte
- The City of Bradbury
- The City of West Covina
- The City of Covina

Project lists were obtained directly from each of these jurisdictions, and a CEQAnet search was also performed. Small projects identified directly by the local jurisdictions or through a review of CEQAnet, including single residence improvement projects that are considered both too small to create or substantially contribute to significant cumulative impacts; and that are also considered part of an ongoing baseline of normal small construction project activities, are not included in the cumulative project list. However, the conservative analysis contained in the SEIR includes all multiple residence construction projects, two residential units or more, in the cumulative project list. Projects, primarily those found in the CEQAnet search, that have no specific work activities such as general plan amendments or projects that were identified as projects with no major concerns (specified through completion of a Notice of Exemption [NOE] or a Negative Declaration [ND]) were also generally considered too small to create or substantially contribute to significant cumulative impacts and were generally not included in the cumulative projects list. The remaining projects that were determined to potentially cause or substantially contribute to cumulative impacts within 2 miles of the Project site are shown in Figure 2-1 and listed in Table 2-1.

[1] The City of Azusa directs project list requests to the “Permit Listing Report” on their website (Azusa 2016). This list consists of the permits issued for various activities such as upgrades to existing residences (additions, electrical, plumbing, etc.), occupancy inspections, remodeling plans, new homes, and signs.

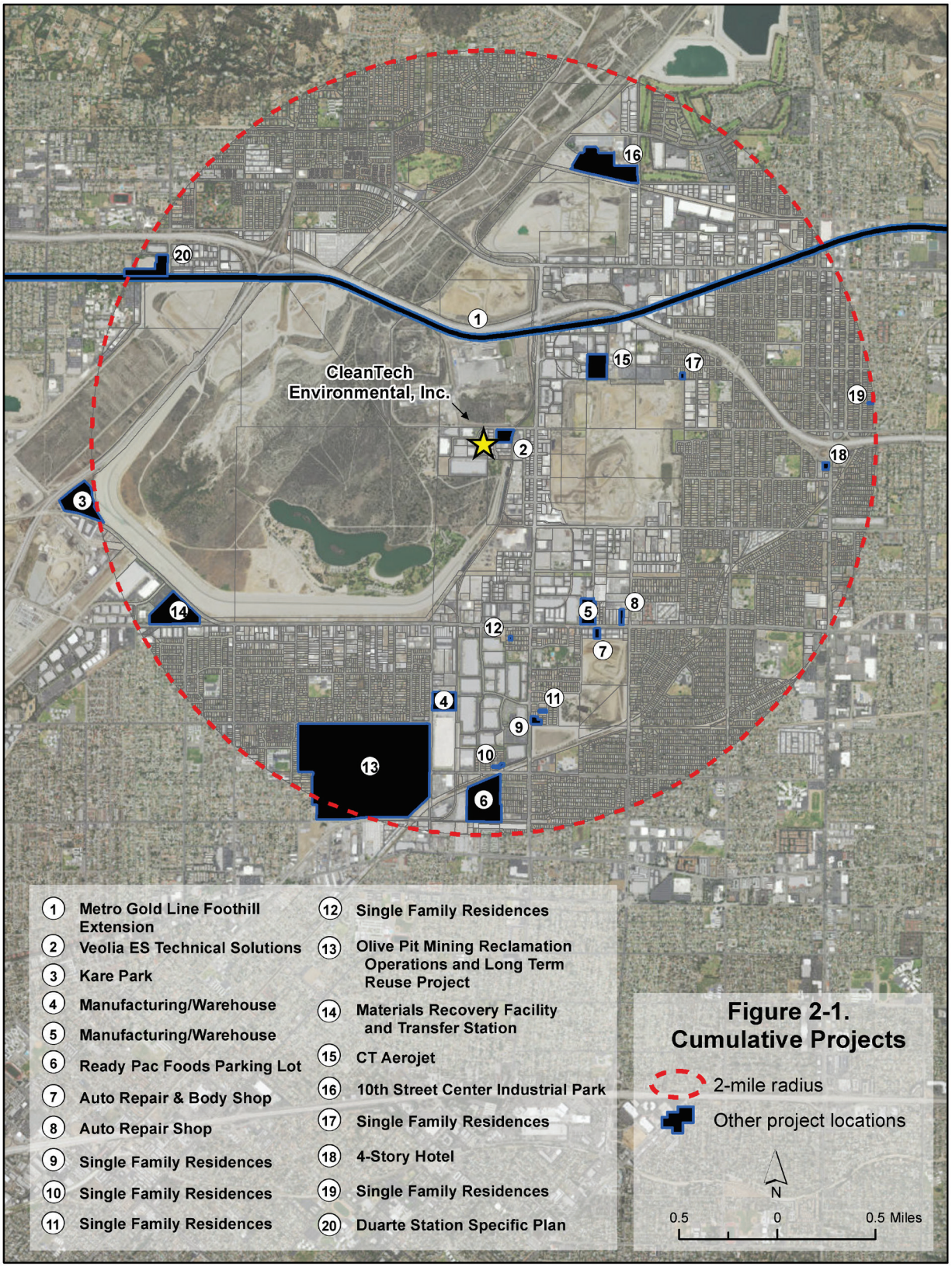


Figure 2-1. Cumulative Projects

Table 2-1. Cumulative Projects Within Two Miles of Project

Project Name	Project Type[1]	Project Description/Size	Project Location	Project Status/ Schedule
1. Metro Gold Line Foothill Extension (Metro 2013; Foothill 2016)	Mass transit	The Gold Line Foothill Extension will extend from Pasadena to Ontario	Parallels the south side of the 605 Freeway in Irwindale. Azusa, and Duarte; minimum distance is approximately 0.5 mile north of the Project site	Construction completed, in operation as of March 2016
2. Veolia ES Technical Solutions, LLC (DTSC 2010)	Industrial	The issuance of a new permit authorizing the continued treatment, storage, and transfer of off-site generated hazardous waste at the existing facility with an increase in the Facility's overall storage capacity from the current 768,550 gallons to 1,054,565 gallons, an increase of or 37%.	1704 West First Street, Azusa; approximately 0.15 mile east of the Project site	DTSC permit issued in February 2011
3. Kare Park (KYL 2016)	Public Park	Construction of five baseball fields, three football/soccer fields, five basketball courts, and an office/clubroom facility.	Northeast corner of Arrow Hwy and I-605 intersection, Irwindale; 2 miles west southwest of the Project site.	Under construction, completion expected by March 2017
4. Shubin Nadal Realty Investors (Irwindale 2016b)	Manufacturing /Warehouse	Construction of a light manufacturing, distribution, warehouse development	4832 – 4810 Azusa Canyon Road, Irwindale; 1.3 miles southwest of the Project site	Permit approved November 2014
5. Pannattoni Development Co. (Irwindale 2016b)	Manufacturing /Warehouse	Construction of a light manufacturing, distribution, warehouse development	16203-16233 Arrow Highway, Irwindale; 0.9 mile southeast of the Project site.	Permit approved October 2015
6. Ready Pac Foods (Irwindale 2016b)	Parking Lot	Construction of a ground level employee parking lot.	4401 Foxdale Avenue, Irwindale; 1.7 miles south of the Project site.	Permit approved April 2016.
7. Ivan Madrigal (Irwindale 2016b)	Auto Repair & Body Shop	Construction of Auto Repair and Body Shop Facility	16238 Arrow Highway, Irwindale; 1.1 miles southeast of the Project site.	Permit approved May 2016
8. Roy Reviere Verninas (Irwindale 2016b)	Auto Repair Shop	Construction of Automotive Repair Facility	16343 Arrow Highway, Irwindale; 1.1 miles southeast of the Project site.	Permit approved January 2016
9. IMD Enterprises, LLC (Irwindale 2016b)	Residential	Eight new housing units on one subdivided parcel	4804 Irwindale Avenue, Irwindale; 1.4 miles south southeast of the Project site.	Permit approved March 2015
10. IMD Enterprises, LLC (Irwindale 2016b)	Residential	Four new housing units on one subdivided parcel	4618 Nora Avenue, Irwindale; 1.6 miles south of the Project site.	Permit approved December 2015
11. F3 Holdings, LLC (Irwindale 2016b)	Residential	Two new housing units on one subdivided parcel	4618 Nora Avenue, Irwindale; 1.4 miles south southeast of the Project site.	Permit approved August 2014

Table 2-1. Cumulative Projects Within Two Miles of Project

Project Name	Project Type[1]	Project Description/Size	Project Location	Project Status/ Schedule
12. IMD Enterprises, LLC (Irwindale 2016b)	Residential	Two new housing units on one subdivided parcel	15808 Hidalgo St., Irwindale; approximately 1 mile south of the Project site	Permit Approved
13. Olive Pit Mining and Reclamation Operations and Long Term Reuse Project (OPR 2016a)	Industrial	Construction of a new on-site access road and relocation of the on-site access point, phased extraction of mineral resources using both dry and underwater processes, and site reclamation	SW corner of Azusa Canyon and Olive Street, Irwindale; approximately 1.5 miles south southwest of the Project site	Construction of access road expected to begin in 2015; Extraction to begin in 2016
14. Athens Services Materials Recovery Facility and Transfer Station (MRF/TS) (OPR 2016a, OPR 2016c, Irwindale 2014, Irwindale 2016a)	Industrial	Construction of a Materials Recovery Facility and Transfer Station, with a Fueling Facility/Convenience Store	NW corner of Live Oak Avenue and Arrow Hwy, Irwindale; approximately 1.7 miles southwest of the Project site	Final EIR completed in April 2016, and project was approved in June 2016.
15. CT Aerojet (OPR 2016a)	Commercial	Construction of approximately 181,800 sf of warehouse and office uses	301 Aerojet Avenue, Azusa; approximately 0.6 mile northeast of the Project site	Approved December 2015
16. 10th Street Center Industrial Park (OPR 2016a)	Industrial	Demolition of an existing one-story office building, building foundations and the concrete remnants of the former shipping/receiving bay, and the construction of a 342,629 sf industrial/warehousing infill development	1001 N Todd Avenue, Azusa; approximately 1.5 mile north northeast of the Project site	Under Construction
17. Single Family Residences (Azusa 2016)	Residential	Construction of two new single family houses	1006 W 3rd Street, Azusa; approximately 1 mile east northeast of the Project site	Unknown
18. 4-story Hotel (Azusa 2016)	Commercial	Construction of a new 4-story hotel	229 S Azusa Avenue, Azusa; approximately 1.7 miles east of the Project site	Unknown
19. Duplex Building (Azusa 2016)	Residential	Construction of a new duplex residential unit	157 N Soldano Ave, Azusa; approximately 2 miles east northeast of the Project site	Unknown
20. Duarte Station Specific Plan (OPR 2016a)	Specific Plan	Plans for a "transit village" that would consist of up to 475 residences, 250 hotel rooms, 400,000 sf of office space, and 12,000 sf of retail	Northwest corner of Highland Avenue and Duarte Road, Duarte; approximately 1.8 miles northwest of the Project site	Approved in 2013

Cumulative project list review sources: OPR 2016a; OPR 2016c; Azusa 2016; Bradbury 2016, Baldwin Park 2016; Covina 2016; Duarte 2016; Irwindale 2016b; LA County 2016a; LA County 2016b; and West Covina 2016.

1 - Projects that consist of minor alterations to existing structures, or other minor projects that would not have the potential to create significant cumulative effects and/or that would be considered part of an ongoing normal baseline of small construction projects are not included in the cumulative project list.

2 – Project not to be confused with the Waste Management Waste Transfer Facility project that was approved in 2011.

The majority of the projects listed in Table 2-1 and Illustrated on Figure 2-1 are too remote from the CleanTech Project site and/or are otherwise separated by physical barriers, like the SFDRA or area freeways to produce substantial cumulative impacts, such as by using similar transportation routes. The projects that fall into this category generally include Kare Park, the Olive Pit Mining Project, the projects that will be completed under the Duarte Station Specific Plan, the 10th Street Center Industrial Park, the Azusa hotel project, and the two Warehouse projects on located on or south of Arrow Highway.

The small, new multi-home residential and projects listed above in Table 2-1 would have limited construction impacts and even smaller impacts after construction. The small commercial projects would also have a very limited effect and the normal cycle of new small business startups and failures would be part of the baseline for the commercial/industrial areas of Irwindale and Azusa. The Metro Gold Line project has been constructed and should serve to reduce most cumulative impacts, including air quality and traffic impacts.

The remaining projects on this cumulative project list, including the approved Athens Project located on Arrow Highway near the 605 Freeway, are discussed where appropriate. An appropriate radius of concern for the cumulative project analysis is discussed separately for each environmental issue area.

2.4 Cumulative Impact Analysis

This cumulative impacts analysis includes a comprehensive discussion of the three resource areas with the greatest potential for cumulative impacts (air quality, noise, and transportation) and less specific discussions for the other less-affected resource areas. General considerations for this Project's cumulative impacts analysis include:

- The Project's operation does not create new regional impacts; it provides a necessary regulatory compliance function. Used oil must be properly handled (collected, tested, recycled, treated, etc.) without exception. Therefore, if this Project does not handle this used oil in a permitted hazardous waste facility (such as under the No Project Alternative) it would be handled by two other potential options explained below:
  - The used oil would be collected by another DTSC permitted facility, where most impacts, at least in the regional perspective, would likely be similar to those determined for the CleanTech facility.
  - CleanTech would continue to collect and test used oil, but could not bulk the oil or perform truck to truck transfers. This would require that CleanTech use a third party to do the bulking, such as the Veolia facility located two blocks from the CleanTech site; or would require CleanTech to nearly double the amount of trips required to handle the oil, since only the smaller collection trucks would have to be used throughout the process. This would increase transportation impacts, air quality impacts, noise impacts, and increase the potential for transportation related accidental spills.
- The Project's construction and operation have no unmitigated significant impacts. This indicates that DTSC could otherwise have prepared a mitigated negative declaration to analyze this Project. However, an EIR was required by Statute, CEQA Guidelines section 15081.5(a)(3).

The revised cumulative impact assessment below, similar to the cumulative impact section in the Draft EIR, references the information, tables, and figures provided in the Draft EIR (DTSC 2014) that are still relevant to the analysis.

2.4.1 Air Quality and Climate Change

Air Quality

The air quality impact analysis considers cumulative impacts to the existing ambient air quality conditions. The significance criteria developed by SCAQMD reflect the existing ambient conditions and air quality planning efforts for the air basin, and reflect the SCAQMD's determination of what constitutes a considerable contribution to existing impacts. Therefore, the air quality impacts analysis provided in Section 3.2 of the Draft EIR, to a large extent, is a cumulative impacts analysis.

Impact AQ-1: The Project would not conflict with or obstruct implementation of the applicable air quality plan. This impact is project-specific and has no potential for cumulative impacts. Therefore, there are no cumulative impacts related to conformance with applicable air quality plans.

Impact AQ-2: The Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Project's air pollutant emissions were determined to be well below the magnitude needed to contribute substantially to an existing or projected air quality standard violation. Therefore, the Project would not cause considerable contributions to any significant cumulative air quality impacts; the cumulative impacts would be less than significant. Also, please see the regional emissions cumulative impacts discussion provided below under Impact AQ-3.

Impact AQ-3: The Project would result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Pollutant emission calculations related to the Project's construction and operation activities were determined to be less than significant based on comparison with SCAQMD emissions significance thresholds. SCAQMD guidance provides the following discussion on cumulative impact analysis:

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. (SCAQMD 2003)

Based on this guidance, the Project would have less-than-significant cumulative air pollutant emissions impacts as all project emissions, construction and operation, were determined to be below all SCAQMD emissions significance thresholds.

Additionally, as noted above in Section 2.1.2 and in the Alternatives Analysis (Section 5) and Air Quality Section (Section 3.2) of the Draft EIR, the Project fulfills a need that must be met. At the time of completion of the CleanTech Draft EIR, California did not have the capacity to recycle all of the used oil generated within the State, and part of the used oil generated within the State was shipped out of State for treatment or disposal. A specific comparison of transportation distances for waste oil that would occur with and without the Project cannot be reasonably determined; however, the Project may actually reduce the transportation distances that would otherwise be required, and therefore have a net reduction in criteria pollutants within the air basin. Additionally, the Project would have beneficial impacts related to material recycling that will cause additional emission reductions; however, the amount of those emissions reductions that would occur within the air basin cannot be quantified. The other cumulative projects listed in Table 2-1, with the exception of the small residential development projects, may similarly contribute to air basin emissions reductions. The Metro Gold Line project should create a significant reduction in regional transportation emissions. The Athens Project and Veolia project may have the potential to reduce transportation emissions within the air basin and cause other

emissions reduction related to the beneficial impacts from recycling in a manner similar to the Project. In summary, the Project's emissions at and near the Project site are low in comparison with the regional emissions significance threshold and would not considerably contribute, along with the operation emissions of the other projects listed in Table 2-1, to cumulatively significant operation emissions; cumulative operation emissions impacts would be less than significant.

Impact AQ-4: The Project would expose sensitive receptors to substantial pollutant concentrations. SCAQMD LSTs and TAC significance thresholds are project-specific impact analyses that identify if a project would have the potential to expose sensitive receptors to substantial pollutant concentrations considering the existing background cumulative air quality conditions. The Project's LST and TAC impacts were found to be less than significant, and there are no other adjacent projects, so the Project would not cumulatively contribute to impacts to sensitive receptors. Cumulative impacts would be less than significant.

Impact AQ-5: The Project would create objectionable odors affecting a substantial number of people. The construction and operation of the facility do not include the use of odorous substances or activities that could cause significant odors or cumulatively contribute to objectionable odors. The Project would not contribute to cumulative odor impacts.

Climate Change

Climate change is a global cumulative impact, so the climate change analysis presented in Section 3.2 of the Draft EIR is a cumulative impact analysis for the Project's greenhouse gas (GHG) emissions. Therefore, that section serves as the cumulative impacts analysis for Climate Change, where impacts from the Project's greenhouse gas emissions were found to be less than significant. The Project's impacts related to conformance with greenhouse gas emissions reduction regulations, plans, and policies where the Project was found to have less-than-significant impacts after mitigation, is a project-specific impact issue that does not have the potential for cumulative project impacts.

2.4.2 Biological Resources

The Project site is in an industrial area located near natural habitat that supports native plants and wildlife, including special-status species. See Biological Resources (Section 3.3) for a detailed description.

The Project would not result in significant impacts to native plants, wildlife, or jurisdictional wetlands and waters during construction and operation (see Section 3.3.3 of the Draft EIR). However, other projects near the Project site may impact local biological resources (See Table 2-1).

Cumulative impacts to biological resources and jurisdictional wetlands and waters could include disruption from lighting, noise, air quality, spread of invasive weeds, and stormwater runoff, as well as direct impacts to plants and wildlife. Potentially significant effects of each project listed in Table 2-1 have been or will be analyzed separately for those projects and, if appropriate and feasible, significant impacts will be mitigated to less than significant levels.

The cumulative effects of past development (e.g., land use changes, water use, habitat degradation, and human disturbance) and the current and foreseeable future projects listed in Table 2.1 have significantly affected biological resources in the region. However, the Project would not increase impacts to biological resources (vegetation, special-status plants, common wildlife, nesting birds, special-status wildlife, and wildlife movement), or jurisdictional wetland resources over baseline conditions (see Section 3.3.3 of the Draft EIR). Therefore, the Project would not considerably contribute to cumulative impacts to biological and jurisdictional wetland resources.

2.4.3 Cultural and Paleontological Resources

The cumulative effects of past development (e.g., mining, commercial and residential development, groundwater recharge projects, and other human disturbance) and the current and foreseeable future projects listed in Table 2-1 have or potentially have the potential to significantly affect cultural and paleontological resources in the region. However, research indicates that the Project site has a very low potential for impacting cultural resources and essentially no potential for impacting paleontological resources. Additionally, the Project, with the implementation of MMs CUL-2.1, CUL 2.2, and CUL-3.1 during the Project's limited construction excavation activities, would have negligible impacts to cultural resources (see Section 3.4.3 of the Draft EIR). Therefore, the Project would not have the potential to create a considerable contribution to cumulative impacts to cultural and paleontological resources.

2.4.4 Hazards and Hazardous Materials

The geographic scope of the cumulative effects analysis for Hazards and Hazardous Materials is limited to the Project site and the routes used by trucks transporting materials to and from the Project site. The transportation of and presence of hazardous waste at the Project site is a potential hazard. People and property could be exposed to risks resulting from the Project during operation. No significant hazardous materials are expected to be used or disposed of during construction. Therefore, hazards risks resulting from construction of the Project are not expected.

As discussed in Impact 3.4-1 (Section 3.4, Hazards and Hazardous Materials in the Draft EIR), CleanTech would collect used oil, waste antifreeze, non-RCRA wastewater, and oily solid waste from off-site generators (gas stations, oil changers, auto repair shops, etc.) using trucks and consolidate the used oil, waste antifreeze, and non-RCRA wastewater in stationary tanks that would be constructed within the existing building at the Project site. All processing areas would be operated within a concrete epoxy-coated and Visqueen-lined 8-inch-thick double crisscrossed steel rebar-reinforced concreted floor containment area. All shipping and receiving areas would be operated and contained within a diked and/or bermed concrete, epoxy-coated containment area (please see Figure 2-4 in the Draft EIR). Any potential accidents resulting from a hazardous material spill or leak at the Project site would be localized and would not result in a cumulatively considerable impact.

The Project would implement MM HAZ-1.1 and MM TR-1.1 to reduce impacts of a hazardous material spills or leaks during transport of hazardous waste to and from the Project site. Proper response and cleanup procedures would be implemented to reduce any potential hazards to the surrounding environment. With the implementation of MM HAZ-1.1 and MM TR-1.1, any potential impacts would be localized and not expected to result in a cumulatively considerable impact.

2.4.5 Hydrology and Water Quality

The geographic scope of the cumulative effects analysis for Hydrology and Water Quality is limited to the Project site and the routes used by trucks transporting materials to and from the Project site. This is an appropriate area of analysis because, as described in Section 3.6 in the Draft EIR, hydrology and water quality impacts associated with the Project would be site-specific and of short duration. Should an accidental spill of hazardous materials occur during Project construction or operation, BMPs would be implemented to ensure that surface water or groundwater quality would not be degraded. Sufficient water supply is available in the area to meet the Project's water supply requirements. The Project would not substantially alter existing drainage patterns or introduce hazards associated with flooding or FEMA-designated Flood Hazard Areas. Therefore, the Project would not introduce impacts to hydrology and water quality that would have the potential to combine with similar impacts of other projects within the same geographic and temporal scope as the Project. No cumulative impacts to hydrology and water quality would occur.

2.4.6 Noise

The area of analysis with respect to cumulative noise impacts is the Project site and immediate vicinity, as well as the primary and contingency truck routes and immediate vicinity. Noise impacts are localized and dissipate quickly with distance so cumulative noise impacts over great distances, under most circumstances, will not occur. The circumstances of the Project are:

- Most of the non-trucking activities noise is shielded by being located indoors;
- The Project site itself is located within a 40-acre commercial/industrial area with relatively high ambient noise levels from existing truck movements and facility activities; and
- The Project's primary local street truck route is not located near sensitive receptors.

As discussed in Section 3.7 (Noise) in the Draft EIR, the Project site and the primary truck route north to the 210 Freeway do not contain any nearby sensitive receptors. The nearest sensitive receptors from the secondary local (i.e. contingency) truck route are located approximately 800 to 1,000 feet to the south of Arrow Highway, and the nearest sensitive receptor to the Project site or the designated primary local truck route, including recreational users of the SFDRA, are over 1,000 feet away.

An appropriate cumulative project radius for on-site noise impacts would be 0.25 mile. The only cumulative project listed on Table 2-1 that is located within a 0.25-mile radius of the Project is the Veolia ES Technical Solutions Project, which included the construction of a wastewater treatment polishing fluidized bed bio-reactor and a 37 percent increase in hazardous waste storage capacity, but not an increase in throughput. For traffic noise, all projects that could create substantial traffic on the same local roadways as those used by the Project also need to be considered, which would include the Athens Services Project.

The Project's approved noise and traffic mitigation measures were designed to reduce both Project-specific impacts and the potential for the Project to cause considerable contributions to significant cumulative impacts.

Impact NOI-1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Each cumulative project would also be required to show compliance with applicable noise performance standards by the jurisdiction approving them. As discussed in Section 3.7 (Noise) in the Draft EIR, the Project would be compliant with all applicable noise standards, ordinances, and policies. The Project has minor impacts to noise at the Project site and along the primary travel route, and normally has no noise impacts along the contingency travel route. While the Veolia Project would introduce additional local noise sources, and the Athens Project would introduce limited new truck noise sources on the Project's primary travel route, and more significant noise sources along the contingency route for the Project, no sensitive receptors are located near the Project site or along the primary travel route; the Project would have a very limited short-term effects on the contingency travel route. Additionally, both Irwindale Avenue and Arrow Highway are designated truck routes by the cities of Irwindale and Azusa (refer to Section 3.8, Transportation in the Draft EIR). Therefore, the Project would result in less-than-significant cumulative noise impacts with respect to violating established plans and policies.

Impact NOI-2: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Vibration is localized and is not expected to extend beyond 500 feet of the source. Therefore, potential cumulative vibration impacts would be limited to the primary and contingency truck routes. The Waste Management MRF and Veolia projects would introduce additional heavy truck trips on the primary and contingency routes, identical to that described for Impact NOI-1. However, no

sensitive receptors are located along these routes at distances that could be impacted by temporary truck trip vibration and both Irwindale Avenue and Arrow Highway are designated truck routes by the cities of Irwindale and Azusa. Therefore, the Project would result in less-than-significant cumulative vibration impacts.

Impact NOI-3: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. It is unlikely that on-site noise from Project operations would combine with any additional operational noise of the Veolia Project to create significant noise levels; first, because the outdoor operation noise sources from the Project are both occasional and minimal; second, because of the distance between the two sites, where noise levels decrease rapidly with distance; and finally, because there are one or two solid walls acting as noise barriers between these two cumulative noise sources. Additionally, no sensitive receptors are located between the two sites. While the Athens Services Project and a few of the other cumulative projects (such as the CT Aerojet and Olive Pit Mining Projects) could also introduce additional limited truck trips and associated truck noise on the primary Project travel route, and more substantial noise on the Project's contingency route, no sensitive receptors are located along these routes and both Irwindale Avenue and Arrow Highway are designated truck routes by the cities of Irwindale and Azusa. Therefore, while truck trips on these routes would increase, the Project would only contribute 46 new heavy truck trips per day that are limited to the Irwindale Avenue primary truck route (unless it is completely closed to traffic and temporary use of the contingency routes is necessary). The addition of these trips would not result in a cumulatively considerable increase in ambient noise levels along this route, which does not have any sensitive receptors within 1,000 feet. Overall, ambient noise levels along the primary truck route is not expected to substantially increase as a result of the Project and the Project normally does not contribute any permanent truck noise along the contingency truck route; the Project would not cause a considerable contribution to cumulative noise impacts at the Project site and along the primary truck route with respect to a permanent increase in ambient noise levels.

Impact NOI-4: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. It is unlikely that on-site noise from Project construction would combine with operational noise of the Veolia Project. Additionally, no sensitive receptors are located between the two sites. The potential for construction-related mobile noise is identical to that described above in Impact NOI-3 for operational truck traffic. Therefore, the Project would result in less-than-significant cumulative noise impacts with respect to a temporary increase in ambient noise levels.

Impact NOI-5: Expose people residing or working in the project area to excessive noise levels from adjacent public airports or private airstrips. The Project site is not located in proximity to a public airport or private airstrip that could subject persons to excessive aircraft noise. The Project would not cumulatively increase persons residing or working adjacent to any airport facilities. No cumulative impacts would occur.

2.4.7 Transportation

The areas of analysis with respect to cumulative transportation impacts are the adjacent segments of the 210 and 605 Freeways and both the primary and contingency truck routes (which include Irwindale Avenue and Arrow Highway). All of the identified projects in the cumulative project list are considered to potentially create new traffic trips on one or more of these segments. Beyond this distance, particularly for freeways, cumulative traffic is influenced by many regional projects, activities, and social factors.

The CleanTech Project would increase trips on Irwindale Avenue north of 1st Street, up to the 210 Freeway interchange; those trips would then disperse throughout the general area as needed to service the used oil generator clients and to access new employee residence locations. Use of the contingency truck route would only occur temporarily if Irwindale Avenue is completely closed to through traffic and temporary use of the contingency routes is necessary. Therefore, the traffic analysis and the cumulative traffic analysis are focused on two traffic segments, Irwindale Avenue north of 1st Street and the 210 Freeway east/west adjacent to the Irwindale Avenue interchange. The total daily traffic increase for this project would be 46 truck trips and 34 employee trips (one-way trips). The maximum peak hour (8:00 to 10:00 a.m. and 4:00 to 6:00 p.m.) increase for this 24-hour operating site would therefore be around 10 one-way trips.

The Project's approved traffic mitigation measures were designed to reduce both Project-specific traffic impacts and the potential for the Project to cause considerable contributions to significant cumulative traffic impacts.

Impact TR-1: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system (including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit). With respect to traffic, all of the projects listed in Table 2-1 could cause increases to traffic on the 210 Freeway and several could cause some increases to traffic on Irwindale Avenue north of 1st Street. The Project's total daily traffic increase of 46 truck trips and 34 passenger vehicle (employee) trips is considered minor compared to hundreds of trips per day for small commercial projects such as gas stations or banks and hundreds of trips during the peak hours for the existing Waste Management MRF Project and the proposed Athens Project. This comparison illustrates that the CleanTech Project has a very small contribution to cumulative traffic impacts in comparison with these other types of uses and two specific local projects.

As noted above, and in a table note under Table 3.8-1 within the Transportation impacts analysis section in the Draft EIR, the Waste Management MRF Project has been included in baseline conditions for the transportation analysis. Therefore, this project is cumulatively considered in the baseline conditions used within the Project transportation analysis and it is therefore not included (i.e., not double counted) in the cumulative impacts analysis. Furthermore, as noted in Table 2-1, the Veolia Project was permitted in 2011. Therefore, traffic from this project is assumed accounted for within the freeway segment baseline volumes presented in Table 3.8-1 (from 2012 data) in the Draft EIR and also considered at this level within the Project analysis. A few of the other projects on the cumulative project list, particularly the Waste Management Azusa Land Reclamation Company Landfill permit modification project, would have the potential to increase traffic on Irwindale Avenue; all of the projects on the cumulative project list (as well as many projects within the region) would have the potential to increase traffic on the 210 Freeway.

The Athens Project, which has 62 to 77 trips on the I-210 Freeway depending on direction and peak hour period (a.m. or p.m.), only has a limited number of trips on Irwindale Avenue and so it would not meaningfully impact service on Irwindale Avenue.

Additionally, the State of California is moving away from an intersection/traffic segment LOS analysis to determine significant traffic impacts under CEQA. The Governor's Office of Planning and Research (OPR) published its revised proposal for evaluating transportation impacts in CEQA in January 2016 (OPR 2016b). This revised guidance moves away from LOS analysis methods in favor of total vehicle miles traveled significance thresholds. This new guidance notes:

Absent substantial evidence indicating that a project would generate a potentially significant level of vehicle miles traveled, projects that generate fewer trips than the threshold for studying consistency with a congestion management program, or 100 vehicle trips per day, generally may be assumed to cause a less than significant transportation impact.

As previously noted, and as evaluated in the Transportation impact analysis section, the Project has a maximum daily trip rate increase that is less than this threshold (80 vehicle trips per day maximum). While OPR's revised CEQA traffic analysis is not finalized, it is partially proposed to correct the current discrepancy that a project would have a significant impact under CEQA should it add any trips to a regional freeway operating under congested (LOS F) baseline conditions. This further supports the conclusion below.

While continued growth of the area will result in a continued cumulative impact to the 210 Freeway (which operates at LOS F during the peak periods), the Project is not considered to have a cumulatively considerable contribution or impact due to the small amount of net new daily trips (less than 0.2 percent) of the average daily traffic (ADT) of this freeway during peak periods. Further, per the restrictions identified in MM TR-1.1, the Project would only utilize the intersection of Irwindale Avenue and Arrow Highway (which operates at LOS F during the peak periods) under limited specific circumstances for a temporary period and would not cumulatively impact traffic volumes along the contingency route. It is expected that Irwindale Avenue north of 1st Street up to the 210 freeway will continue to operate at acceptable levels of service (LOS), while the 210 Freeway would continue to operate at unacceptable levels of service during peak hour periods. Therefore, while the cumulative study area for traffic includes locations operating at LOS F during the peak hours, the Project is considered to have a less-than-significant impact with respect to causing considerable contributions to ongoing and cumulative impacts on the continued operation of these traffic segments outside of acceptable levels identified by Caltrans and City of Azusa.

Impact TR-2: Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. As discussed above under Impact TR-1, the Project would result in a nominal increase (less than 0.2 percent) to ADT volumes on the 210 Freeway (which is part of the congestion management program [CMP] system). Therefore, the Project is considered to have a less-than-significant impact with respect to causing considerable contributions to cumulative impacts to continued operation of the 210 Freeway (which operates at LOS F during the peak periods) outside of acceptable levels identified by the applicable CMP.

Impact TR-3: Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The Project would not cumulatively introduce any structures or features that could cumulatively impact air navigation. No cumulative impacts would occur.

Impact TR-4: Substantially increase hazards because of a design feature or incompatible uses. The Project does not include any roadway improvements or new uses that could cumulatively contribute to roadway hazard impacts. No cumulative impact would occur.

Impact TR-5: Result in inadequate emergency access. The Project would not require any roadway or lane closures/disruptions either during construction or operation that could cumulatively contribute to restricted emergency access. No cumulative impact would occur.

Impact TR-6: Conflict with adopted policies, plans, or programs supporting regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The Project would not include use of any roadway that includes dedicated bicycle lanes and would not impact any public transportation facilities. No cumulative impact would occur.

2.4.8 Effects Found Not to be Significant

The resource areas with cumulative effects found not to be significant include:

- Aesthetics;
- Agricultural Resources;
- Geology and Soils;
- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation;
- Utilities and Service Systems.

As described in the Project's Draft EIR (DTSC 2014), the Project would have negligible or no impacts on all of these resource areas. Therefore, the Project would not have the potential to cause considerable contributions to cumulative impacts for these resource areas.

2.5 Summary

The Project is a relatively small project, and all of the Project's adverse impacts after mitigation are found to be less than significant. Those adverse impacts considering other past, recent, and proposed projects surrounding the Project site area would not have the potential to considerably contribute to significant cumulative impacts. Therefore, the Project's contributions to cumulative impacts are less than significant.

3. References

Azusa (City of Azusa). 2016. Permit Activity Listings – Permit Listing Report. [Online]: http://www.ci.azusa.ca.us/DocumentCenter/View/26154. Accessed June 2016.

___. 2011. Waste Management Material Recovery Facility Transfer Station and Household Hazardous Waste Facility Draft EIR. March 2011.

Baldwin Park (City of Baldwin Park). 2016. Permit list. Obtained June 2016.

Bradbury (City of Bradbury). 2016. Permit list. Obtained June 2016.

CAPCOA (California Air Pollution Control Officers Association). 2013. California Emissions Estimator Model (CalEEMod) User's Guide Version 2013.2, Appendix D. [Online]: http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixd.pdf?sfvrsn=2. Accessed June 2016.

Covina (City of Covina). 2016. Development Projects List. Obtained August 2016.

DTSC (California Department of Toxic Substances Control). 2014. Draft Environmental Impact Report for the CleanTech Environmental Inc. Hazardous Waste Facility Permit. [Online]: https://www.dtsc.ca.gov/upload/CleanTech-DEIR-Final-Aug-2014.pdf. August 2014. Accessed June 2016.

___. 2010. California Environmental Quality Act Initial Study: Veolia Hazardous Waste Facility Permit.

Duarte (City of Duarte). 2016. Permit list. Obtained June 2016.

Foothill (Foothill Gold Line Construction Authority). 2016. Foothill Gold Line Website. Pasadena to Azusa Construction Phase webpage. [online]: http://www.foothillgoldline.org/construction_phases/pasadena_to_azusa/. Accessed June 2016.

Irwindale (City of Irwindale). 2016a. Final Environmental Impact Report Irwindale Materials Recovery Facility and Transfer Station Project. April 2016. [Online]: http://www.ci.irwindale.ca.us/DocumentCenter/View/1637. Accessed June 2016.

___. 2016b. Permit list. Obtained June 2016.

___. 2014. Irwindale Materials Recovery Facility and Transfer Station Project Recirculated Draft EIR. Dated July 2014. [Online]: http://www.ci.irwindale.ca.us/DocumentCenter/View/951. Accessed June 2016.

KYL (Kare Youth League). 2016. Kare Park News Website. [Online]: http://kyl.org/KarePark/news/. Accessed June 2016.

LA County (Los Angeles County). 2016a. County of Los Angeles Open Data Construction Permits Query Website. [Online]: https://data.lacounty.gov/browse?category=Public+Works&q=permit+&sortBy=relevance&utf8=%E2%9C%93. Accessed June 2016.

___. 2016b. Department of Public Works Building Permit Viewer Website for Unincorporated Los Angeles County Permits Issued. [Online]: http://dpw.lacounty.gov/bsd/bpv/PermitData.aspx. Accessed June 2016.

Metro (Metro Gold Line Foothill Extension Construction Authority). 2013. Metro Gold Line Foothill Extension – Azusa to Montclair Final Environmental Impact Report.

OPR (Governor's Office of Planning and Research). 2016a. CEQAnet Database Query for the Cities of Azusa, Baldwin Park, Bradbury, Covina, Duarte, Irwindale, and West Covina for the period of December, 2013 to the query dates in early June 2016.. http://www.ceqanet.ca.gov/QueryForm.asp. Accessed June 2016.

___. 2016b. Revised Proposal for Updates to CEQA Guidelines Evaluating Transportation Impacts in CEQA. [Online]: http://www.foothillextension.org/cities-stations/irwindale/. Accessed June 2016.

___. 2016c. CEQAnet Database Query for the Cities of Azusa, Baldwin Park, Bradbury, Covina, Duarte, Irwindale, and West Covina for the period of June 2016 to the query date of July 28, 2016. http://www.ceqanet.ca.gov/QueryForm.asp. Accessed July 2016.

SCAQMD (South Coast Air Quality Management District) 2003. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution – Appendix D Cumulative Impact Requirements Pursuant to the California Environmental Quality Act. [online}: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed June 2016.

West Covina (City of West Covina). 2016. Cumulative Project List. Obtained July 2016.