

Waste Compliance and Mitigation Program Staff Report
New Solid Waste Facilities Permit for City Fibers Los Angeles Plant No. 2
SWIS No. 19-AR-1236
September 1, 2010

Background Information, Analysis, and Findings:

This report was developed in response to the City of Los Angeles Local Enforcement Agency (LEA) request for Department of Resources Recycling and Recovery (Department) concurrence on the issuance of a proposed new Solid Waste Facilities Permit (SWFP) for the City Fibers Los Angeles Plant No. 2, SWIS No. 19-AR-1236, located in the City of Los Angeles and owned and operated by City Fibers, Inc./David Jones. A copy of the proposed permit is attached. The report contains Waste Compliance and Mitigation Program (WCMP) staff's analysis, findings, and recommendations.

The proposed permit was received on July 15, 2010. A different version of the permit was received on August 31, 2010 and another on September 8, 2010. Action must be taken on this permit no later than November 7, 2010. If no action is taken by November 7, 2010, the Department will be deemed to have concurred with the issuance of the proposed new permit. Staff is recommending that CalRecycle concur in the issuance of the proposed SWFP. Note: The current temporary SWFP expired on June 30, 2010.

Proposed Changes

The following changes to the permit are being proposed:

| | Current Permit (2008 Temporary SWFP) | Proposed Permit |
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| Hours of Operation | Not specified in the permit. | Material Acceptance Monday - Saturday 6:00AM – 7:00 PM Material Processing/Refuse Transfer Monday – Saturday - 24 hours per day Sunday 6:00 AM – 2:00 PM |
| Tons per Operating Day | Not specified in the permit. | Total: 500 * Tons/Day *Provided that the facility is in compliance with Condition 17 K. |
| Vehicles per Operating Day | Not specified in the permit. | Total: 135 Vehicles/Day |
| Key Design Parameters | Not specified in the permit. | Permitted Area (Acres): 1.26 Acres Design Capacity 1080 Tons/Day |
| 12. Legal Description of Facility | Not specified in the permit. | H. M. Ame's Subdivision of the Glassell Tract, Map M R 23-73, Block 8, Lot 31 Assessor Parcel No. (APN): 5168021*** |
| 13. Findings | Not specified in the permit. | a. The facility is identified in the City of Los Angeles Non-Disposal Facility Element on Table 66, approved May 25, 2010. [Public Resources Code (PRC), Section 50001 (a)(2)]. b. This Permit is consistent with standards adopted by the California Department of Resources Recycling and Recovery (CalRecycle). [PRC, Section 44010]. c. The design and operation of the facility is in compliance with the State Minimum Standards for |

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| | | <p>Solid Waste Handling and Disposal as determined by the Local Enforcement Agency (LEA). [PRC, Section 44009].</p> <p>d. The local fire protection agency, the Los Angeles City Fire Department, has determined that the facility is in conformance with applicable standards as required in PRC, Section 44151.</p> <p>e. The City of Los Angeles Local Enforcement Agency has determined that the solid waste facility permit is being issued to replace the temporary permit that was issued on July 16, 2008 without any changes to the facility's permit limits or operations. The LEA has determined that pursuant to 14 CCR, Section 15301 that this application would fall under Categorical Exemption, Class 1 – Existing Facilities. This Categorical Exemption allows for the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing private facilities involving negligible or no expansion of use beyond that previously existing at the time of the lead agency's determination.</p> <p>f. Based on the Transfer/Processing Report (TPR), dated July 2010, the LEA is satisfied that this facility will provide measures to adequately control noise levels, gas/odor nuisances, traffic congestion, litter nuisances, and vectors such that there will be no significant impact on the local residences.</p> | | | | | | | | | | |
| 14. Prohibitions | Not specified in the permit. | <p>The permittee is prohibited from accepting any liquid waste sludge, non-hazardous wastes requiring special handling, designated waste or hazardous waste unless such waste is specifically listed below, and unless the acceptance of such waste is authorized by all applicable permits. In the event that hazardous or suspected hazardous wastes are brought into the facility the operator is required to follow procedures for obtaining information, notification, handling and disposal as outlined in Load Check Program of the TPR.</p> <p>The permittee is additionally prohibited from the following items or activities:</p> <ul style="list-style-type: none"> - Acceptance of solid waste materials not authorized by the LEA in the Transfer Processing Report - Acceptance of liquid waste, containerized or not, - Acceptance of radioactive wastes - Scavenging or open burning, - Acceptance of sewage sludge, or septic tank pumpings, slurries, untreated medical waste, dead animals. | | | | | | | | | | |
| 15. Documents | Not specified in the permit. | <table border="0"> <tr> <td>Document</td> <td>Date</td> </tr> <tr> <td>Transfer/Processing Report</td> <td>July 2010</td> </tr> <tr> <td>Local & County Ordinances</td> <td>Municipal Code</td> </tr> <tr> <td>Identification in Non-Disposal Facility Element</td> <td>May 2010</td> </tr> <tr> <td>Finding of Conformance – LA Co SWTF</td> <td>N/A</td> </tr> </table> | Document | Date | Transfer/Processing Report | July 2010 | Local & County Ordinances | Municipal Code | Identification in Non-Disposal Facility Element | May 2010 | Finding of Conformance – LA Co SWTF | N/A |
| Document | Date | | | | | | | | | | | |
| Transfer/Processing Report | July 2010 | | | | | | | | | | | |
| Local & County Ordinances | Municipal Code | | | | | | | | | | | |
| Identification in Non-Disposal Facility Element | May 2010 | | | | | | | | | | | |
| Finding of Conformance – LA Co SWTF | N/A | | | | | | | | | | | |

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| <p>16. Self Monitoring</p> | <p>Not specified in the permit.</p> | <p>Results of all self-monitoring programs as described in the TPR will be reported as follows: (The monitoring reports are delinquent 30 days after the end of the reporting period)</p> <p>Programs:</p> <p>Reporting frequency: Monthly (Due by the 15th of each month)</p> <p>Agency Reported To: LEA</p> <p>The types and quantities of decomposable and inert wastes, including separated or commingled recyclables, received each day. The operator shall maintain these records on the facility's premises for a minimum of one year and made available to any Enforcement Agencies' personnel on request.</p> <p>Quantity and types of wastes salvaged/recycled per month and the final destination of these diverted materials.</p> <p>The quantities and types of hazardous wastes, untreated medical wastes, or otherwise prohibited wastes found in the waste stream and the disposition of these materials.</p> <p>All incidents of unlawful disposal of prohibited materials and the operator's actions taken. Indicate those incidents which occurred as a result of the random load checking program.</p> <p>Copies of all written complaints regarding this facility and the operator's actions taken to resolve these complaints. (Notification to the LEA within one day following the complaint is also required.)</p> <p>Final disposal site for transferred wastes.</p> <p>The number and type of vehicles using the facility per day.</p> <p>Reports of all special/unusual occurrences and the operator's actions taken to correct these problems.</p> <p>Record of receipt of a Notice of Violation from any regulatory agency. In addition, the operator shall notify the LEA at once following receipt of a Notice of Violation or upon receipt of notification of complaints regarding the facility, which have been received by other agencies.</p> <p>Reporting Frequency: 45 Days Before Any Change</p> <p>Agency Reported To: LEA, CoSWMC</p> <p>Agency Reported To: LEA and New owner</p> <p>Notify the LEA and CoSWMC, in writing, of any change in the name of operator or in control of ownership of land.</p> |
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| | | <p>Notify any new owner or operator by letter, a copy of which shall be filed with the LEA of the existence and terms of the Solid Waste Facility Permit.</p> |
| <p>17. LEA Conditions</p> | <p>This permit has been issued by the enforcement agency in accordance with Article 3.1.1, Chapter 5, Division 7, Title 14, of the California Code of Regulations. This permit incorporates by reference, as terms and conditions of the permit, all minimum standards applicable to it, as set forth in Division 7, Title 14, of the California Code of Regulations.</p> <p>This facility for which this permit has been issued may only be operated in accordance with the description provided in the attached application package, date May 7, 2008, which is hereby incorporated by reference. This permit shall expire on the effective date of a solid waste facilities permit when it is issued to the operator of the facility or by June 30, 2010, whichever comes first.</p> | <p>a. This facility shall comply with all the State Minimum Standards for Solid Waste Handling and Disposal as specified in Title 14 and Title 27, California Code of Regulations (CCR).</p> <p>b. This facility shall comply with all federal, state, and local requirements and enactments including all mitigation measures given in any certified environmental document filed pursuant to the <i>Public Resources Code</i>, Section 21081.6.</p> <p>c. The operator shall comply with all notices and orders issued by any responsible agency designated by the Lead Agency to monitor the mitigation measures contained in any of the documents referenced within this permit pursuant to the <i>Public Resources Code 21081.6</i>.</p> <p>d. Information concerning the design and operation of this facility shall be furnished, in a timely manner, upon request to the LEA.</p> <p>e. The operator shall maintain a copy of this permit and TPR at the facility so as to be available at all times to facility personnel and to Enforcement Agencies' personnel. As approved in the TPR, the operator will maintain detailed plan view and elevation view design plans of the proprietary MRF equipment at the facility and will be available at all times to Enforcement Agencies' personnel.</p> <p>f. The site must be supervised by trained individuals with relevant experience at all times during operating hours and that will be the point of contact for Enforcement Agencies' personnel. Supervisors and managers must have the authority to commit company resources to resolve emergency and non-emergency health, safety and environmental issues, if such action is necessary to protect the health and safety of site employees and the nearby community.</p> <p>g. The LEA reserves the right to suspend, modify or revoke this permit when deemed necessary due to an emergency, a potential health hazard, the creation of a public nuisance or failure to pay LEA fees.</p> <p>h. The operator shall notify the LEA, in writing, of any proposed significant changes in the routine facility operation or changes in facility design during the planning stages. In no case shall the operator undertake any changes unless the operator first submits to the LEA a notice of said changes at least 180 days before said changes are undertaken, and those changes are approved by the LEA. Any significant change as determined by the LEA would require a revision of this permit.</p> |

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| | | <p>i. A summary of all pilot projects must be submitted to the LEA in writing prior to the implementation of that pilot project. The LEA must approve all pilot projects before they can be implemented.</p> <p>j. The operator shall not expand facility operations above those permitted by this permit and the associated site plan until such time that those buildings, including the any associated environmental mitigation requirements are constructed in accordance with applicable local permits, approvals, and regulations.</p> <p>k. The permitted maximum daily capacity of this facility will be implemented in a three phase approach to ensure that the facility can satisfactory comply with the permit conditions and State Minimum Standards prior to reaching the full capacity. The initial Phase I will start with a daily tonnage limit of 300 tons of incoming material. Once the operator has demonstrate the ability to operate the facility for a period of 6 months without a violation of permit conditions and/or State Minimum Standards, the facility will be permitted to move into Phase II with an incoming daily tonnage limit of 400 tons. After an additional 6 months of compliance, the facility will be able to proceed to the final Phase III with a daily tonnage limit of 500 tons. At any point in time that the facility is issued a Notice of Intent letter by CalRecycle, the daily tonnage limit will revert back to the initial daily tonnage limit of 300 tons.</p> <p>l. The operator shall comply with all conditions and requirements as approved in the TPR.</p> <p>m. The operator shall comply with all of the requirements of all applicable laws pertaining to employee health and safety.</p> <p>n. The operator shall provide site employees with a lunch room and restroom facilities within a building.</p> <p>o. All unloading, loading and processing of material and wastes shall occur inside the permitted facility property. Incoming vehicles shall be completely inside of the permitted area prior to unloading and at no time shall incoming trucks be permitted to unload or clean-out their vehicles outside of the property on the adjacent streets. Once the tipping floor reaches capacity, the operator is prohibited from accepting any additional tonnage until such time that there is sufficient capacity to safely accept any additional material.</p> <p>p. The operator shall restrict the unloading area to as small an area that is practicable, provide adequate control of windblown material, minimize the propagation of flies, rodents or other vectors and the</p> |
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| | | <p>creation of nuisances resulting from solid wastes being handled at the facility.</p> <p>q. All recyclables shall be stored within designated areas in a neat and orderly manner so as not to generate litter, harbor vectors or pose a nuisance.</p> <p>r. All stairways and walkways shall be maintained unobstructed and free of debris. The operator shall provide and maintain a safe means of access and egress to all work stations.</p> <p>s. The operator shall maintain, at the facility, accurate daily records of the weight and/or volume of materials received. These records shall be made available to the LEA's personnel and to the CalRecycle personnel for inspection and shall be maintained on site for a period of at least three years. Incoming materials, solid waste residual and processed recyclables from the permitted operation shall not be intermingled with material from the non-permitted operation.</p> <p>t. The operator shall comply with the established Litter Control Program. This program includes tarping requirements, containment of litter, site and facility clean-up and monitoring procedures. It is the responsibility of the operator to keep Harriett Street, 24th Street and 25th Street free of litter and debris resulting from the facility operation.</p> <p>u. The operator must provide additional dust and odor control measures and other environmental and health/safety measures upon the request of the LEA, if such measures as provided in the TPR prove to be inadequate.</p> <p>v. Noise levels at the property boundaries shall be minimized and in conformance with the Chapter XI – Noise Regulations of the Los Angeles City Municipal Code.</p> <p>w. The operator shall provide daily cleaning of the entire transfer facility and all residual wastes from processing of recyclables shall be removed from the facility within 48 hours. If water is used as the cleaning agent, runoff from such wash downs shall not leave the site.</p> <p>x. Operational controls shall be established to preclude the receipt and disposal of hazardous waste and volatile organic chemicals or other types of prohibited wastes. The operator shall comply with the approved Hazardous Waste Load Checking Program. Any changes in this program must be approved by the LEA prior to implementation. The following Solid Waste Facility Permit conditions supplement those conditions:</p> <p>(1) The minimum number of random waste vehicle loads to be inspected daily at this facility is one (1).</p> |
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| | | <p>The LEA reserves the right to increase the required number of incoming waste load inspections.</p> <p>(2) The personnel training and load check procedures necessary for the program must be submitted and approved by the LEA. Visual inspections are to be performed by trained spotters and equipment operators. The LEA must review and approve this program and operation. Additional measures may be required upon the request of the LEA.</p> <p>(3) In the event that hazardous or suspected hazardous wastes are brought into the facility, the operator is required to follow procedures for obtaining information, notification, handling and disposal as outlined in the approved Load Check Program.</p> <p>(4) Suspected hazardous wastes must be properly labeled and stored in the hazardous waste containment area.</p> <p>(5) It is the responsibility of the facility operator to dispose of any prohibited materials (hazardous or suspected hazardous materials, liquid, sludges, radioactive, electronic or medical wastes) in accordance with all local, state and federal regulations. Electronic wastes are prohibited from being dismantled or further processed onsite without first obtaining all necessary local, state and federal permits and approvals.</p> <p>(6) Incidents of unlawful disposal of prohibited materials shall be reported to the LEA monthly as described in the monitoring section of this permit. In addition, the following agencies shall be notified immediately, after each occurrence, if applicable, of any incidents of illegal hazardous materials disposal:</p> <ul style="list-style-type: none"> I. Los Angeles County Fire Prevention Bureau, Hazardous Materials Division II. Environmental Crimes Division, L.A. County District Attorney III. California Highway Patrol <p>y. The operator shall maintain a daily log of special/unusual occurrences. If there are no special occurrences for a given day, that day's entry shall read "none". This log shall include, but are not necessarily limited to:</p> <p>Any loads refused entry into the facility, potentially live ammunition, fires, explosions, earthquakes, discharge of hazardous liquids or gases to the ground or the atmosphere, or significant injuries, accidents, or property damage.</p> <p>Each of these log entries shall be accompanied by a summary of any actions taken by the operator to</p> |
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| | | mitigate the occurrence. The operator shall maintain this log at the facility so as to be available at all times to site personnel and to the Enforcement Agencies' personnel. Any of these specified entries made in this log must be promptly reported to the LEA. Only authorized personnel can make entries into this log. If a situation arises that cannot be handled by facility personnel then call 911 or another outside emergency agency, as appropriate. The LEA shall be notified immediately after the appropriate outside emergency agency has been notified. |
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Findings:

Staff recommends concurrence with the issuance of the proposed new SWFP as revised. All other required submittals and findings required by Title 27 of the California Code of Regulations (CCR 27) Section 21685 have been provided and made. Staff has determined that California Environmental Quality Act (CEQA) requirements have been met to support concurrence. The findings that are required to be made by the Department when reaching a determination are summarized in the following table. The documents on which staff's findings are based have been provided to the Deputy Director with this Staff Report and are permanently maintained in the facility files maintained by the WCMP.

| CCR Title 27 Sections | Findings | |
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| 21685(b)(1) LEA certified complete and correct Report of Facility Information | The LEA provided the required certification in their permit submittal letter dated July 15, 2010. | <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable |
| 21685(b)(2) LEA Five Year Permit Review | The LEA is not required to complete a Five Year Permit Review at this time because the facility has only been operating under a Temporary Solid Waste Facilities Permit since July 16, 2008. | <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable |
| 21685(b)(3) Solid Waste Facility Permit | The LEA submitted a revised proposed solid waste facilities permit on September 8, 2010. | <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable |
| 21685 (b)(4)(A) Consistency with Public Resources Code 50001 | The LEA in their permit submittal package received on July 15, 2010 provided a finding that the facility is consistent with PRC 50001. WCMP staff in the Jurisdiction Compliance and Audit Section found the facility is identified in the Non-Disposal Facility Element and with the Countywide Integrated Waste Management Plan, as described in the memorandum dated June 17, 2010. | <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable |
| 21685(b)(7) Operations Consistent with State Minimum Standards | WCMP staff in the Compliance, Evaluations, and Enforcement Division (CEED) and LEA found that the facility was in compliance with operating and design requirements during an inspection conducted on August 26, 2010. See compliance history below for details. | <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable |

| CCR Title 27 Sections | Findings | |
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| 21685(b)(8) LEA CEQA finding | The LEA provided a finding in their permit submittal package received on July 15, 2010, that the proposed permit is consistent with and supported by the existing CEQA documentation. See details below. | <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable |
| CEQA determination to support responsible agency's findings | WCMP staff found that the proposed permit is consistent with CEQA and supports the Department's concurrence in the new permit. | <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable |

Compliance History:

The facility is required to obtain a SWFP because the volume of residual materials exceeds ten percent of the material coming into the facility. The facility operated under a temporary permit issued on July 16, 2008, pursuant to AB 1473, however the temporary SWFP expired on June 30, 2010. On August 10, 2010, the LEA issued a Cease and Desist Order to the operator requiring the operator to immediately cease and desist all activities that require a SWFP (since the Temporary SWFP expired and a new full SWFP not yet issued). Since issuance of the Cease and Desist Order, the operator has ceased accepting some curbside recyclables from certain jurisdictions in an effort to meet the requirements of the three part test (i.e., materials are source separated, contain less than 10% residual and contain less than 1% putrescible) and has been operating as a recycling center until a SWFP is obtained.

The facility was inspected by WCMP staff in CEED on June 23, 2010, and documented four (4) violations of State Minimum Standards including 14 CCR Section 17407.2 – Cleaning; 14 CCR Section 17408.7 – Personnel Health and Safety; 14 CCR 17410.2 – Supervision and Personnel; 14 CCR 17414 - Record Keeping Requirements. (See attached inspection report).

The facility was re-inspected by WCMP staff in CEED on August 26, 2010, and documented one (1) area of concern for PRC 44002 – Operator Authorized by SWF Permit and one area of concern for 14 CCR Section 17410.4 – Vector, Bird and Animal Control. The previous violations noted on the June 23, 2010 inspection had been corrected. (See attached inspection report.)

At the start of the August 26, 2010 inspection, the tipping floor was completely clear of unsorted material. During the inspection, two loads of curbside recyclables were received from Universal Waste Services (from Calabasas).

Per the Cease and Desist Order, and as the operator chose to operate as a recycling center, the operator is required to submit data to the LEA by August 31, 2010, showing that the facility meets the requirements of a recycling center (i.e., meets the three part test). The residual and putrescible amounts are calculated on a monthly basis based on the number of operating days. Preliminary data was received from Clements Environmental, Inc. on September 8, 2010 indicating the residual amount since the Cease & Desist Order was issued was 6.5%. Putrescible data was not provided.

The LEA has documented fifty-five (55) violations of State Minimum Standards and five (5) violations of the Public Resources Code during the last two years.

For calendar year 2008, the facility had 10 violations of State Minimum Standards: four (4) violations of 14 CCR Section 17409.5 – Loadchecking; four (4) violations of 14 CCR Section 17414 – Record Keeping; two (2) violations of 14 CCR Section 17409.4 – Signage; and one (1) violation of PRC Section 44014(b) – Failure to comply with terms of the permit - trucks were observed tipping loads onto the public street.

For calendar year 2009, the facility had thirty (30) violations of State Minimum Standards: fourteen (14) violations of 14 CCR Section 17409.4 – Signage; eight (8) violations of 14 CCR Section 17409.5 – Loadchecking; six (6) violations of 14 CCR Section 17414 – Record Keeping; two (2) violations of 14 CCR Section 17408.1 – Litter Control; and three (3) violations of PRC Section 44014(b) – Failure to comply with terms of the permit - trucks were observed tipping loads onto the public street.

For calendar year 2010 (January-July), the facility had one (1) violation of PRC 44002 – Operator Authorized by SWF Permit (July 2010); fifteen (15) violations of State Minimum Standards: five (5) violations of 14 CCR Section 17414 – Record Keeping; one (1) violation of 14 CCR Section 17409.5 – Loadchecking; three (3) violations of 14 CCR Section 17407.5 – Hazardous, Liquid and Special Wastes; three (3) violations of 14 CCR Section 17409.3 – Scavenging and Salvaging; one (1) violation of 14 CCR Section 17407.2 – Cleaning; one (1) violation of 14 CCR Section 17408.7 – Personnel Health and Safety and one (1) violation of 14 CCR Section 17410.2 – Supervision and Personnel.

Based on the above documentation of violations of standards, and review of the TPR, CalRecycle staff initially found that the facility operator had not been able to operate and was currently not operating the facility consistent with State Minimum Standards. Staff also found that unless changes are made the facility will not be able to operate consistent with State Minimum Standards.

CalRecycle staff met several times with the LEA and operator's consultant, Clements Environmental to address the long history of violations, questions on the Transfer Processing Report (TPR) and the finding that the operator would not be able to comply with State Minimum Standards based on current operations. The LEA added the following conditions to the proposed permit to address staff's concerns:

Permitted Tons per Operating Day: 500 * Tons/Day

*Provided that the facility is in compliance with Condition 17 K.

k. The permitted maximum daily capacity of this facility will be implemented in a three phase approach to ensure that the facility can satisfactorily comply with the permit conditions and State Minimum Standards prior to reaching the full capacity. The initial Phase I will start with a daily tonnage limit of 300 tons of incoming material. Once the operator has demonstrated the ability to operate the facility for a period of 6 months without a violation of permit conditions and/or State Minimum Standards, the facility will be permitted to move into Phase II with an incoming daily tonnage limit of 400 tons. After an additional 6 months of compliance, the facility will be able to proceed to the final Phase III with a daily tonnage limit of 500 tons. At any point in time that the facility is issued a Notice of Intent letter by CalRecycle, the daily tonnage limit will revert back to the initial daily tonnage limit of 300 tons.

o. All unloading, loading and processing of material and wastes shall occur inside the permitted facility property. Incoming vehicles shall be completely inside of the permitted area prior to unloading and at no time shall incoming trucks be permitted to unload or clean-out their vehicles outside of the property on the adjacent streets. Once the tipping floor reaches capacity, the operator is prohibited from accepting any additional tonnage until such time that there is sufficient capacity to safely accept any additional material.

Additionally, clarifications to the TPR were made.

Environmental Analysis:

Under the California Environmental Quality Act (CEQA), the Department must consider, and avoid or substantially lessen where possible, any potentially significant environmental impacts of the proposed Solid Waste Facilities Permit before the Department concurs in it. In this case, the Department is a Responsible Agency under CEQA and must make a determination as to whether this proposed permit is categorically or statutorily exempt or additional CEQA analysis is necessary in the form of a Negative Declaration or Environmental Impact Report.

The City Fibers Los Angeles Plant No. 2 operated under a Temporary Solid Waste Facilities Permit that expired on June 30, 2010. The proposed Full Solid Waste Facilities Permit presently under consideration is for the operation of an existing recycling facility. The Materials Recovery Facility is located on a 1.26 acre parcel; limited to 500 tons per day of Municipal Solid Waste.

Under CEQA, the Department must consider, and avoid or substantially lessen where possible, any potentially significant environmental impacts of the proposed Solid Waste Facilities Permit before the Department concurs in it.

The City of Los Angeles Local Enforcement Agency proposes to issue a new Full Solid Waste Facilities Permit to replace the temporary permit that it issued on July 16, 2008, without any changes to the facility's permit limits or operations. The LEA has determined that, pursuant to 14 CCR, Section 15301, this permit application would fall under a Categorical Exemption, Class 1 – Existing Facilities. This Categorical Exemption allows for the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing private facilities involving negligible or no expansion of use beyond that existing at the time of the lead agency's initial approval of the project.

Furthermore, the LEA has provided a finding that the facility is an existing Transfer/Processing Facility, and the applicant did not propose any significant change in operation from that approved under the temporary permit that the LEA issued in 2008; therefore the facility meets the conditions of 14 CCR Section 15301 as Categorically Exempt - Existing Facilities.

Department staff prepared a Preliminary Review (attached) to determine whether a Categorical Exemption is adequate for the Department's concurrence on this Full Solid Waste Facilities Permit. Department staff made the finding/determination that a Categorical Exemption, 14 CCR Section 15301 – Existing Facilities was adequate for the Department's concurrence in this proposed Full Solid Waste Facilities Permit. Staff's finding is based on the fact that there is "negligible or no expansion of use beyond that existing at the time of the lead agency's determination" to issue the temporary permit in 2008.

Staff recommends that the Department, acting as a Responsible Agency under CEQA, prepare a Notice of Exemption, based on the Categorical Exemption for existing facilities (Section 15301), to be filed with the State Clearinghouse after the Department's concurrence in the Full Solid Waste Facilities Permit proposed by the LEA, in that the proposed permit is to be issued to an existing facility that will not expand or significantly change its operations from those authorized under the temporary permit that the LEA issued in 2008. Further, there are no grounds under CEQA for the Department to prepare an environmental document or assume the role of Lead Agency for its consideration of the proposed Solid Waste Facilities Permit.

Department staff further recommends the Categorical Exemption is adequate for the Director's environmental evaluation of the proposed project for those project activities which are within the Department's expertise and authority, or which are required to be carried out or approved by the Department.

The administrative record for the decision to be made by the Department includes the administrative record before the LEA, the proposed Solid Waste Facilities Permit and all of its components and supporting documentation, this staff report, the Categorical Exemption and other documents and materials utilized by the Department in reaching its decision on concurrence in, or objection to, the proposed Solid Waste Facilities Permit. The custodian of the Department's administrative record is Dona Sturgess, Legal Office, Department of Resources Recycling and Recovery, P.O. Box 4025, Sacramento, CA 95812-4025.

Local Issues:

The project document availability, hearings, and associated meetings were extensively noticed, in both English and Spanish, consistent with the CEQA and SWFP requirements. A review from the public process indicates that environmental justice issues were not identified by the surrounding community (Census Tract 2060.50). Census information indicates that the surrounding population is approximately 39.5% White, 9.8% African American, 6.9% Asian, 0.7% American Indian and Alaska Native, 39.1% some other race, and 4.0% two or more races. 60.9% of the total population describe themselves as Hispanic or Latino. 33.0% of the families are below the poverty level. Staff has not identified any environmental justice issues related to this item. Staff finds the project and permit process to be consistent with Government Code Section 65040.12, as there has been fair treatment of people of all races, cultures, and incomes with respect to the proposed action being recommended above.

Public Comments:

The LEA held a public informational meeting on June 2, 2010, at the City Fibers Office – Main Conference Room, located at 2500 Santa Fe Avenue, in the city of Los Angeles. A representative from Assembly District 46 and two representatives from the City of Vernon LEA were present. There was a general discussion of the project but no official comments were received by the LEA. No members of the public were in attendance. The LEA responded to all questions and concerns.

The Department staff provided an opportunity for public comment during the WCMP workshop on August 9, 2010 and September 13, 2010.

Department Staff Actions:

Staff has worked with the LEA throughout the permit process by providing comments on permitting documents and attending public meetings where the project was discussed.

MEMORANDUM

To: Mark de Bie, Chief **Date:** August 27, 2010
 Permitting and Local Enforcement Agency Support Division
 Waste Compliance and Mitigation Program
DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

From: SMarkie for
 Patrick Snider
 Permitting and Local Enforcement Agency Support Division
 Waste Compliance and Mitigation Program
DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

Subject: Preliminary Review for a Proposed New Solid Waste Facilities Permit for
 City Fibers Los Angeles Plant No. 2, SWIS No. 19-AR-1236,
 City of Los Angeles

State law requires compliance with the California Environmental Quality Act (CEQA) either through the preparation, circulation and adoption/certification of an environmental document and any mitigation reporting or monitoring program or by determining that the proposal is categorically or statutorily exempt.

The proposed Solid Waste Facility Permit (SWFP) is considered to be a project under CEQA, and is required to obtain a New SWFP pursuant to 27 CCR Section 21570.

The City of Los Angeles, Department of Building and Safety, as the Local Enforcement Agency (LEA), have provided a finding that the project is consistent with and supported by the existing CEQA analysis, specifically a Notice of Exemption.

On July 15, 2010, the LEA forwarded the New SWFP Application package, including CEQA compliance documentation. Department of Resources Recycling and Recovery (Department) staff, in consultation with the LEA, have determined that a Notice of Exemption adequately fulfills CEQA requirements for the LEA.

Proposed Project:

Since the Department cannot accept as their own a Notice of Exemption as prepared by another agency Department staff has prepared this Preliminary Review to determine whether a Notice of Exemption is appropriate or additional CEQA analysis will be required.

A review of the information provided by the LEA and other information available to Department staff leads to the following understanding of the project, as proposed:

- A change from a temporary SWFP permit to a full SWFP permit in order to continue existing operations;
- No operational changes are taking place with the proposed full Solid Waste Facility Permit.

During discussions with the LEA and Department staff, it was determined that the proposed project would not require any physical changes at the City Fibers Los Angeles Plant No. 2. There will be no change in equipment, no change in access, no new buildings or structures, no change in hours of operation, and no change in vehicle trip frequency.

Department Staff's Evaluation

Department staff reviewed the following documents:

- Proposed New SWFP Permit received July 15, 2010, and revised September 8, 2010;
- New Permit Application dated July 15, 2010;
- Transfer/Processing Report dated July 2010;

Analysis of CEQA Exemption Requirements

This preliminary review completed by Department staff indicates that the proposed project:

- Involves the continued operation of an existing facility, with no expansion;
- Will not result in an increase in tonnage received or in vehicle trip frequency;
- Will have no reasonable possibility of significant environmental impacts;
- Does not allow relaxation of standards leading to environmental degradation;
- Will not contribute to cumulative impacts that are significant; and
- Will have no adverse substantial change in the significance of a historical resource.

SUMMARY

For the above reasons, Department staff recommends filing a Notice of Exemption from CEQA for this proposed project - CEQA Guidelines Section 15301 – Existing Facilities.

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities ... involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

If the Department approves the project and the exemption from the provisions of CEQA, staff will file a Notice of Exemption with the State Clearinghouse.

Transfer/Processing Facility Inspection Report (53)

| | | | | | |
|----------------------------------------------------|------|---------------------|------------------------------------------|--------------------|------------|
| Enforcement Agency: | | City of Los Angeles | | | |
| SWIS Facility File Number (99-xx-9999) | | Inspection Date | | Program Code | |
| 19-AR-1236 | | 6/23/2010 | | CalRecycle Focused | |
| Time In | 0800 | Time Out | 1015 | Inspection Time | 2.25 hours |
| Facility Name | | | Received By | | |
| City Fiber- LA Plant No. 2 | | | E-mailed to Todd Jones | | |
| Facility Location | | | Owner Name | | |
| 2545 East 25th Street, Los Angeles (City) 90058 | | | | | |
| Inspector | | | Also Present (Name) | | |
| Jeff Hackett, CalRecycle | | | D. Thompson, LEA; R. Jaquez, City Fibers | | |

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF THE DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC) AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR)

| No Violations or Areas of Concern | |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| V | A |
| X | 17407.2 - Cleaning |
| | Comments: Facilities shall be cleaned each operating day of all litter and loose materials. Litter and loose materials were observed throughout the facility, under the sorting lines, between and hanging from the sorting lines and between baled materials. During the inspection, CalRecycle staff observed facility personnel standing on debris in the aisles of the sorting lines, which poses a hazard to personnel sorting the materials (Photos 1 - 4). In some places, debris in the aisles was as high as the guard rail. At approximately 9:30 a.m. the equipment was shut down for break time. Following the break, personnel began cleaning around the facility including sorting line aisles. Cleaning the sorting line aisles must be conducted more frequently to ensure the aisles remain clear of debris and does not pose a safety hazard to personnel (slips, trips, falls, evacuation in emergency, etc.). |
| X | 17414 - Record Keeping Req. |
| | Comments: The operator must continue to work with the LEA to ensure that all records required are being adequately maintained, include the information as requested by the LEA, and are available for review during normal business hours. All forms are to be filled out completely. At the time of the inspection, all the records were not available for review, including the training records. If the operator plans to maintain any records at an alternate location, the operator needs to obtain approval from the LEA to ensure the records will be available during normal business hours. |
| X | 17407.5 - Haz., Liq., & Special Wastes |
| | Comments: Household hazardous waste recovered through the load check program is placed in a three cubic yard bin located in the storage warehouse/break room area. A couple of cans of paint and small gas cylinders were observed next to a drop box on the northeast perimeter wall of the facility that were removed from the waste stream a while ago (covered with dust and spider webs). The operator needs to make sure that when household hazardous waste is removed from the waste stream that they are then moved to the designated storage area for proper storage. A new hazardous waste storage locker was purchased, but is waiting to be removed from the packaging and placed in an acceptable location (isolated location). Complete the installation/placement of the new hazardous waste storage locker. |
| X | 17410.4 - Vector, Bird & Animal Control |
| | Comments: Flies were observed throughout the facility, including on the bottom of the pile of incoming material in several areas and southeast of the sorting line loading pit (Photo 5). Operator must implement measures to control or prevent the propagation, harborage, and attraction of flies at the facility. |
| X | 17418.3 - Traffic Control |

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| | <p>Comments: At the time of the inspection, the tipping area was nearly full resulting in customers having to unload in such a manner that the vehicle extends beyond the entry/exit gate onto Harriett Street (Photos 6 - 7). The operator is required to make sure that traffic is controlled to prevent interference with or creation of a safety hazard on adjacent public streets or roads (including backing in and unloading). All unloading, loading and processing of material and wastes must occur inside the permitted facility property. When vehicles have to unload close to the entry/exit gate, it results in the front-end loader having to back onto Harriett Street to push the materials to the tipping area and hauling vehicles "cleaning out" beyond the property boundary. Incoming vehicles must be completely inside the permitted area prior to unloading and not unload or clean-out their vehicles outside of the property on the adjacent streets.</p> |
| X | 17408.7 - Personnel Health & Safety |
| | <p>Comments: At the time of the inspection, the operator was not able to provide a copy of the Injury, Illness and Prevention Program (IIPP) for review. A copy of the IIPP shall be available for review during normal business hours.</p> |
| X | 17410.2 - Supervision & Personnel |
| | <p>Comments: Adequate supervision and a sufficient number of qualified personnel must be provided to ensure proper operation of the facility in compliance with all applicable laws, regulations, permit conditions, and other requirements. Based on the facility conditions and violations and areas of concern noted, additional supervision of the facility is warranted to ensure the facility is operated in accordance with all applicable requirements. A supervisor must be present during operating hours that is trained in subjects pertinent to facility operations and maintenance (e.g., hazardous waste screening, equipment operations, personnel health and safety, environmental controls, etc.) as well as be familiar with the facility's operating permits, conditioning documents (e.g., Transfer/Processing Report), location of the records, and emergency procedures. In addition, since the training records were not available for review, it is unclear if the operator recently provided lock out/tag out training as recommended in CalRecycle's February 23, 2010 inspection report. Due to the cleaning and maintenance of the sorting lines during different parts of the day, all personnel need to be adequately trained in lock out/tag out procedures and such training documented. At the time of the facility's personnel break, the sorting line was turned off, however, CalRecycle staff observed personnel walking across the conveyor belt to access the stairs on the south side of the sorting line rather than use the north side stairs. Although the sorting line was not running, walking across a conveyor belt should be discouraged. The LEA will continue to monitor the operator's progress to ensure adequate supervision is provided.</p> |
| Inspection Report Comments: | |
| Notes: | |
| <ol style="list-style-type: none"> 1. This facility is currently operating under a Temporary Solid Waste Facility Permit (SWFP) issued by the LEA on July 16, 2008. The Temporary SWFP will expire on June 30, 2010. The operator submitted an application for a new full SWFP to the LEA on May 25, 2010. On June 30, 2010, the LEA accepted the application as incomplete and is working with the operator to provide additional information in the Transfer/Processing Report. Under the Temporary SWFP, the facility is permitted to accept 500 tons per day of source separated curbside recyclables. 2. At approximately 8:30 a.m., CalRecycle staff tried to contact Mr. Todd Jones (818-895-7203) to meet at the facility for the inspection since facility personnel were not able to answer questions or describe specifics of the operation. CalRecycle staff was informed that Mr. Jones was not available. A message was left with the office personnel requesting that he contact CalRecycle staff as soon as possible. CalRecycle staff did not receive a return call prior to leaving the facility or by the end of the day. 3. CalRecycle staff did not observe an emergency shut off cable ("pull cable") along the south side of the north sorting line typically provided on similar sorting lines. The operator is encourage to review the features and required maintenance to ensure all equipment has the required safety guards, emergency shut off cables or buttons, and that all are functioning properly and adequately maintained. 4. The stacking of baled materials appeared more organized and were limited to no higher than four bales. 5. As noted in CalRecycle's February 23, 2010 inspection report, the operator is encouraged to place additional eyewash stations (e.g., portable or wall/beam mounted systems) closer to the tipping area and sorting lines. 6. Martin Perez and Susan Markie of CalRecycle were also present during the inspection. 7. This was a pre-permit inspection, pursuant to PRC 44009. | |

FIELD PHOTOGRAPHY LOG SHEET

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 6/23/10

Photo by: Jeff Hackett



Photograph Description: Photo 1 – Sorting line aisle cover with debris as high as the guard rail. More frequent cleaning required to keep aisles clean and clear of debris.

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 6/23/10

Photo by: Jeff Hackett



Photograph Description: Photo 2 – Sorting line aisle cover with debris as high as the guard rail. More frequent cleaning required to keep aisles clean and clear of debris.

FIELD PHOTOGRAPHY LOG SHEET

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 6/23/10

Photo by: Jeff Hackett



Photograph Description: Photo 3 - Sorting line aisle and stairs blocked with plastic materials. More frequent cleaning required to keep aisles clean and clear of debris.

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 6/23/10

Photo by: Jeff Hackett



Photograph Description: Photo 4 - Cleaning under and around the sorting lines.

FIELD PHOTOGRAPHY LOG SHEET

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 6/23/10

Photo by: Jeff Hackett



Photograph Description: Photo 5 – Flies observed southeast of the sorting line loading pit.

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 6/23/10

Photo by: Jeff Hackett



Photograph Description: Photo 6 – Customers unloading at tipping area and extending onto Harriett Street.

FIELD PHOTOGRAPHY LOG SHEET

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 6/23/10

Photo by: Jeff Hackett



Photograph Description: Photo 7 – Extent of the waste close to the entry/exit gate along Harriett Street.

Transfer/Processing Facility Inspection Report (53)

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|----------------------------------------------------|------|---------------------|-----------------------------------------------|--------------------|-----------|
| Enforcement Agency: | | City of Los Angeles | | | |
| SWIS Facility File Number (99-xx-9999) | | Inspection Date | | Program Code | |
| 19-AR-1236 | | 8/26/2010 | | CalRecycle Focused | |
| Time In | 1515 | Time Out | 1715 | Inspection Time | 2.0 hours |
| Facility Name | | | Received By | | |
| City Fibers - LA Plant No. 2 | | | E-Mailed to Todd Jones | | |
| Facility Location | | | Owner Name | | |
| 2545 East 25th Street, Los Angeles (City) 90058 | | | | | |
| Inspector | | | Also Present (Name) | | |
| Jeff Hackett | | | D. Thompson & R. Roque, LEA; A. Rodriguez, CF | | |

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF THE DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC) AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR)

| No Violations or Areas of Concern | |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| V | A Regulations |
| X | <p>PRC 44002 - Operator Authorized by SWF Permit</p> <p>Comments: From July 16, 2008 to June 30, 2010, the facility operated under a Temporary Solid Waste Facility Permit (SWFP) as a large volume transfer/processing facility. The Temporary SWFP expired on June 30, 2010. The operator submitted an application for a new full SWFP to the LEA on May 25, 2010, however, the application was deemed incomplete by the LEA on June 24, 2010. The operator subsequently submitted revisions/updates to the application and the application was deemed complete by the LEA on July 12, 2010. The LEA is in the process of finalizing a proposed new full SWFP.</p> <p>On August 10, 2010, the LEA issued a Cease and Desist Order to the operator requiring the operator to, upon receipt of the Cease and Desist Order, immediately cease and desist all activities that require a SWFP (since the Temporary SWFP expired and a new full SWFP not yet issued). Since receipt of the Cease and Desist Order on August 12, 2010, the operator has ceased accepting some curbside recyclables from certain jurisdictions in an effort to meet the requirements of the three part test (i.e., materials are separated for reuse, contain less than 10% residual and contain less than 1% putrescible wastes) and operate as a recycling center pursuant to 14 CCR 17402.5(d) until a SWFP is obtained. At the start of the inspection, the tipping floor was completely clear of unsorted material (Photo 1). During the inspection, two loads of curbside recyclables were received from Universal Waste Services (from Calabasas). Per the Cease and Desist Order, since the operator chose to operate as a recycling center, the operator is required to submit data to the LEA by August 31, 2010, showing that the facility meets the requirements of a recycling center (i.e., meets the three part test). The residual and putrescible amounts are calculated on a monthly basis based on the number of operating days. Although the residual and putrescible data were not available at the time of the inspection for the month of August 2010, CalRecycle staff remain concerned that even with a reduction in the amount of material received since issuance/receipt of the Cease and Desist Order, the amount of residual in the material received may continue to exceed the 10% threshold.</p> <p>Tonnage Report Summaries for 2010: January: Peak Tonnage = 186 tons; Average Daily Tonnage = 134 tons February: Peak Tonnage = 372 tons; Average Daily Tonnage = 271 tons March: Peak Tonnage = 396 tons; Average Daily Tonnage = 277 tons April: Peak Tonnage = 137 tons; Average Daily Tonnage = 113 tons May: Peak Tonnage = 134 tons; Average Daily Tonnage = 110 tons June: Peak Tonnage = 261 tons; Average Daily Tonnage = 130 tons July: Peak Tonnage = 175 tons; Average Daily Tonnage = 114 tons August 1 - August 11: Peak Tonnage = 149 tons; Average Daily Tonnage = 118 tons (Cease and Desist Order received on August 12, 2010) August 12 - August 25: Peak Tonnage = 103 tons; Average Daily Tonnage = 84 tons</p> |
| X | <p>17410.4 - Vector, Bird & Animal Control</p> <p>Comments: Fly controls have improved since the June 23, 2010 CalRecycle inspection. Improved cleaning and the placement of fly traps/bags around the facility have helped reduce the number of flies. However, additional control measures (e.g., more fly traps/bags and/or periodic spraying as mentioned in the Transfer/Processing Report) are warranted to better control flies around the sorting lines and loading pit.</p> |

Inspection Report Comments:

Corrections since the June 23, 2010 CalRecycle inspection:

17407.2 - Cleaning - Cleaning of litter and loose materials around the facility was greatly improved. The aisles were clear of debris. Please be sure the aisles remain clear of debris during sorting operations so as not to pose a hazard to personnel. (Photos 2 - 5)

17414 - Records - Records were available on-site for review during the inspection. Records must continue to be maintained at the facility and all forms completely filled out as stated in the Transfer/Processing Report. The operator is encouraged to designate at least two qualified personnel to maintain the records to ensure the records are maintained each day (to cover when designated personnel are on vacation, ill, etc.). In addition to the recent training topics provided in the training records, the operator should also consider training on lock-out/tag-out procedures, hazardous waste recognition and handling, and emergency procedures.

17408.7 - Personnel Health & Safety - A copy of the Injury, Illness and Prevention Program was available for review at the time of the inspection (provided as Appendix B of the Transfer/Processing Report).

17410.2 - Supervision and Personnel - Facility operations have improved and the site supervisor (Anarbal Rodriquez) was able to provide the records and describe facility operations and requirements. Operator is encouraged to continue to provide adequate supervision and personnel as operations revert to the previous level of activity once the new full SWFP is issued and make sure all personnel are adequately trained in subjects pertinent to facility operations and maintenance.

17407.5 - Haz., Liq., & Special Wastes - A new hazardous waste storage locker is now in place (located northeast of the employee breakroom/lockers/restrooms area) to temporarily store household hazardous waste recovered through the load check program. The storage locker was locked to prevent unauthorized access. The operator shall ensure the household hazardous wastes are stored, handled and removed in accordance with local, state, and federal requirements.

17418.3 - Traffic Control - Two vehicles were observed unloading during the inspection. The vehicles were able to unload and "clean out" within the proposed facility boundary. Traffic control will continue to be monitored by the LEA to ensure that vehicles unload and "clean out" within the proposed facility boundary. (Photo 5)

Notes:

1. At the time of the inspection, the sorting lines were shutting down for the day and personnel were cleaning the facility. Two loads of curbside recyclables were received during the inspection. A 40 yard debris box with residual materials was observed being removed from the facility.
2. Additional eye wash stations were observed around the facility.
3. With the number of sorting lines at the facility, it is recommended that the operator inspect the sorting lines as required per the manufacturer's recommendations to ensure all the equipment has the required safety guards and emergency shut off cables or buttons and that all are functioning properly and adequately maintained. In addition, new Danger and Warning stickers/placards are needed on the equipment control panel. (Photo 6)
4. Also present during the inspection were Martin Perez and Susan Markie of CalRecycle and Larry Minor and Chip Clements of Clements Environmental (Consultants).
5. This was a pre-permit inspection, pursuant to PRC 44009.

FIELD PHOTOGRAPHY LOG SHEET

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 8/26/10

Photo by: Jeff Hackett



Photograph Description: Photo 1 – Tipping floor empty on arrival to the facility at 1515 hours.

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 8/26/10

Photo by: Jeff Hackett



Photograph Description: Photo 2 – Cleaning.

FIELD PHOTOGRAPHY LOG SHEET

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 8/26/10

Photo by: Jeff Hackett



Photograph Description: Photo 3 – Cleaning.

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 8/26/10

Photo by: Jeff Hackett



Photograph Description: Photo 4 – Cleaning. Aisle of sorting lines clear of materials.

FIELD PHOTOGRAPHY LOG SHEET

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 8/26/10

Photo by: Jeff Hackett



Photograph Description: Photo 5 – Tipping area. Cleaning. Room for vehicles to unload and "clean out" within proposed facility boundary.

Site Name: City Fibers -
LA Plant No. 2

SWIS #: 19-AR-1236

Date: 8/26/10

Photo by: Jeff Hackett



Photograph Description: Photo 6 – New Danger and Warning stickers/placards warranted on the equipment control panel for the northern sorting line for lock out/tag out.

