

11. Hazards, Hazardous Materials and Wildfire

This chapter describes the known hazards and hazardous materials in the proposed project area and evaluates the potential impacts associated with Plan Concept 1 and Plan Concept 2. These two plan concepts include similar design elements, but the locations and characteristics of the elements vary between the two plans. This chapter also addresses wildfire risk in the vicinity of the proposed project and whether the proposed project would contribute to wildfire risk.

11.1 Environmental Setting

This section describes the environmental setting and impacts related to hazards and hazardous materials and wildfire risk.

11.1.1 Hazards and Hazardous Materials

For this analysis, the term “hazardous materials” will be defined as both hazardous substances and hazardous wastes. In the *Code of Federal Regulations* (CFR), “hazardous material” is defined as “a substance or material that ... is capable of posing an unreasonable risk to health, safety, and property when transported in commerce” (49 CFR 171.8).

California defines a hazardous material as “any material that because of its quantity, concentration, or physical or chemical characteristics poses a significant present or potential hazard to human health and safety or the environment if released into the workplace or environment” (*Health and Safety Code* Section 25501). “Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment (*Health and Safety Code* Section 25501).

“Hazardous wastes” are defined in California *Health and Safety Code* Section 25141(b) as wastes that: “...because of its quantity, concentration, or physical, chemical, or infectious characteristics:

- Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.
- Pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of, or otherwise managed.

11.1.2 Wildfire

The California Department of Forestry and Fire Protection (CalFire) uses Fire Hazard Severity Zones (FHSZs) to classify anticipated fire-related hazards for the entire state and includes classifications for State Responsibility Areas (SRAs), Local Responsibility Areas (LRAs), and Federal Responsibility Areas. Fire hazard measures physical fire behavior based on vegetation type (fuel), topography, and weather conditions and considers fire spread rate, fire heat production, and production of embers that facilitate fire growth. Fire hazard severity represents the potential of an area to burn and the severity with which it may burn. The entire project site is within the LRA for Placer County.

11.1.3 Methodology

The assessment of hazards and hazardous materials impacts was derived from review of the following resources as well as hazard and hazardous materials protocol and practices for the project. This information was reviewed in association with the project location and planned construction and operation protocol to determine the potential presence of existing or resulting hazards associated with the project as identified in the CEQA Checklist.

- State Water Resources Control Board (SWRCB) GeoTracker website (SWRCB 2020)
- Department of Toxic Substances Control (DTSC) EnviroStor website (DTSC 2020)
- Aerial photographs and topographic maps
- General plans, *Code of Ordinances*, zoning maps, and emergency evacuation and response plans
- Office of Emergency Services (OES) website for Placer County (<https://www.placer.ca.gov/1371/About-OES>)
- Placer County Sunset Area Plan Final EIR (2019)

The following facility permits are also relevant in this assessment:

- Solid Waste Facilities Permit (SWFP) No. 031-AA-0001 for Waste Recovery including MRF operations, compost operations (organics management), construction and demolition (C&D) waste operations, public waste drop-off area operations, and household hazardous waste (HHW) facility operations.
- SWFP No. 031-AA-0210 for Waste Disposal operations, including operation of the Western Regional Sanitary Landfill (WRSL) and the receipt of inert materials.
- Waste Discharge Requirements Order No. R5-2007-0047; and Monitoring and Reporting Program No. R5-2007-0047, and 93-200.
- General Permit to Discharge Stormwater Associated with Industrial Activity.

The wildfire assessment was derived from reviewing the following resources to determine the potential presence of existing or resulting potential risk for wildfire or post-wildfire impacts at the proposed project:

- Aerial photographs and topographic maps
- CalFire website
- General plans, zoning maps, emergency evacuation, and response plans

11.1.4 Local Setting

Potential hazards that exist at the project site include the potential for hazardous wastes to be encountered at the current ongoing landfill operations including HHW operations; potential release of bioaerosols from composting operations; potential hazards associated with contamination to groundwater and surface waters through contact with landfill gas (LFG), LFG condensate, landfill leachate, compost leachate and contact water, and potential explosions from the buildup of LFG; and the presence of vectors (discussed in Section 11.1.3).

Hazards Associated with Waste Disposal and Recovery Operations

The WRSL is operated as a Class II and Class III facility. Class III facilities are those that accept nonhazardous municipal solid waste (MSW). The definition of nonhazardous solid waste from 27 *California Code of Regulations* (CCR) Section 20220 is as follows:

Nonhazardous solid waste includes all putrescible and nonputrescible solid, semi-solid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances (except e-wastes), manure, vegetable or animal solid and semi-solid wastes, and other discarded waste (whether of solid and semi-solid consistency); provided such wastes do not contain wastes which must be managed as hazardous wastes, or wastes which contain soluble pollutants in concentrations which exceed applicable water quality objectives or could cause degradation of wastes of the state (i.e., designated waste).

A Class II facility can accept all of the nonhazardous solid waste allowed for a Class III facility plus “designated” wastes, using the criteria set forth in CCR Title 27 and Waste Discharge Requirements R5-2007-0047. Waste accepted at a Class II facility includes any industrial solid waste that cannot be described as hazardous.

The Western Placer Waste Management Authority’s (WPWMA’s) active Class II and Class III solid waste landfill has capacity to accept solid waste through 2058 under Waste Discharge Requirements Order No. R5-2007-0047. The Solid Waste Facility Permit (No. 031-AA-0210 for Waste Disposal), which is reviewed every 5 years, is scheduled to be reviewed in December 2022 by Placer County Environmental Health as the Local Enforcement Agency (LEA). The WRSL is prohibited from accepting hazardous, radioactive, medical, liquid, or other wastes requiring special treatment or handling.

The MRF operates under a separate Solid Waste Facility Permit (No. 031-AA-0001 for Waste Recovery), which includes MRF operations, compost operations (organics management), C&D waste operations, public waste drop-off area operations, and HHW facility operations. As described by Placer County, the MRF is operated to recover recyclable materials from mixed waste, process green and wood wastes for composting or biomass, receive and process source-separated recyclables, and provide for receipt and recycling or disposal of HHW. Materials not recovered through MRF processing are disposed of in the landfill (Placer County 2019).

The site includes two HHW facilities, one used primarily for acceptance of HHW and one used for HHW acceptance and characterization/containerizing HHW prior to offsite transport. Hazardous waste from households and Conditionally Exempt Small Quantity Generators is accepted by the HHW operations. HHW is only accepted in small quantities and includes items such as paints, pesticides, and oils. The WPWMA has an ongoing load-checking program to detect and manage prohibited wastes, including HHW, that may enter the site commingled with solid waste loads.

After an initial screening of loads at the scale houses, customers are directed to the appropriate areas within each facility for unloading materials. Spotters generally conduct load content surveillance near the unloading areas. Waste inspections consist of a detailed examination of a randomly selected load performed a minimum of 2 days per week. If hazardous materials are found at any of the waste receiving, processing, or disposal areas, they are transported to and temporarily stored in a hazardous waste containment structure designed specifically for that purpose. Hazardous wastes are stored for no longer than the time period allowed by state regulations (per Title 22, CCR, §66262.34(c)(1)). Licensed haulers remove any hazardous waste encountered onsite.

Other project components including the organics management operation are not anticipated to generate hazardous wastes. Class III nonhazardous solid wastes are assumed to include mixed municipal wastes, C&D debris, yard wastes and rubbish, and inert materials such as concrete and white goods, as described in Chapter 3, Project Description. Organics management operations also do not involve the use of hazardous materials.

Hazards Associated with Release of Bioaerosols from Composting

The WPWMA compost facility is permitted under the MRF's Solid Waste Facility Permit (No. 031-AA-0001 for Waste Recovery) issued by CalRecycle, Authority to Construct permits (WPMR AC-21A, B and C) issued by the PCACPD and the General Composting Order issued by the RWQCB (WQ 2015-0121-DWQ). The total permitted site is 52.6 acres, with compost transfer/operations occurring on 25.4 acres. Bioaerosols, specifically *Aspergillus fumigatus*, associated with composting activities could be considered a health hazard in susceptible individuals, although it is not considered a health hazard for healthy individuals. This fungus is commonly found in agricultural settings, lawn mowing, and gardening activities. In composting facilities, it could be dispersed from dusty composting operations. The composting operations involve the application of water to the compost windrows and the periodic turning of windrows to minimize release of bioaerosols and dust.

Hazards Associated with Daily Operational Activities

Daily operational activities have the potential to present hazards onsite including the potential for hazardous materials spills and storage (that is, fuels, oils, and lubricants), the potential for spills associated with leaking vehicles and maintenance service operations, potential risks associated with operation of heavy equipment, and risks associated with improper dust control.

Because of these risks, employees undergo training in the following areas:

- Mechanical and safety procedures for operating and maintaining equipment
- Lock out/tag out procedures to be used when working on equipment
- Procedures for detecting and handling hazardous waste
- Use of personal protective equipment for each job position
- Location, use, and limitations of available first aid and emergency equipment
- Injury and Illness Prevention Plan
- Hazard communication/employee right to know
- Spill response procedures
- Emergency evacuation procedures

Employees involved in handling waste receive additional training in detecting and handling hazardous waste. Key employees receive 40 hours of Hazardous Waste Operations Training and are recertified annually. Additionally, a certified instructor trains all new forklift and loader operators. Forklift and loader operators are recertified every year. A receiving area supervisor, lead HHW technician, sort lead/supervisor, and maintenance supervisor receive emergency response training and act as Emergency Response Coordinators. These individuals and all supervisors also receive training in first aid and CPR.

Dust can present hazards onsite if uncontrolled. The major sources of dust are during unloading and processing of commercial MSW loads in the receiving area of the MRF and during receiving and processing of green, wood, and C&D. The following measures are implemented for dust control:

- Dust generated from material being unloaded or from loading the in-feed conveyors is substantially contained within the receiving area.
- Mistlers are used to minimize dust along the sorting lines and in the receiving area.
- Dust generated from the processing of wood waste, green waste, and C&D is controlled with water spray.
- Paved areas are swept or watered daily during the dry season.
- Dust from the composting operation is minimized by maintaining appropriate moisture content of compost.

- Grinding and windrow turning operations are minimized during windy conditions.

Hazardous Materials in Soil and Groundwater

WPWMA implements a groundwater monitoring program at the WRSL, described in Chapter 12, Hydrology and Water Quality. The predominant groundwater flow direction is toward the south (SCS Engineers 2020). The *Second Quarter 2020 Monitoring Report* (SCS Engineers 2020) for the facility indicates that volatile organic compounds (VOCs) and inorganic compounds were detected in monitoring wells at levels that exceed the maximum concentration level for drinking water.

In 2019, as reported in the Engineering Feasibility Study for the WRSL, groundwater was contaminated by VOCs and inorganics. A Correction Action Program (CAP) was implemented to mitigate the impacts to groundwater. The CAP consisted of installation of a landfill gas collection system and closure of unlined Modules 1, 2, and 10, and partially lined Module 11. Closure of the unlined modules entailed recompacting the soil cover, improving the drainage by regrading, and the placement of vegetative cover layers and low permeability clay (SCS Engineers 2019).

Based on information from the EnviroStor and GeoTracker databases maintained by DTSC and SWRCB, there are no hazardous materials sites located within 1 mile of the WPWMA facility boundary that have affected the soil or groundwater.

Hazards Associated with Landfill Gas Management System

Decomposition of organic waste in landfills can generate carbon dioxide and methane, referred to as LFG. During the anaerobic phase of decomposition, methane continues to be generated until all organic matter in the landfill has decomposed. LFGs can accumulate in landfills and seep out through cracks in liners and other permeable materials. LFG is also a hazard when it becomes trapped in confined spaces, including buildings, where it can become explosive and threaten the health and safety of onsite personnel.

WPWMA implements an active LFG extraction system at WRSL consisting of approximately 100 operating interior vertical extraction wells including 12 interior horizontal extraction wells, 27 perimeter migration control extraction wells, HDPE laterals, subheaders and header pipes, 4 pneumatic condensate sumps, and a flare station. The flare station consists of three centrifugal blowers, two air compressors, and an enclosed ground flare.

A LFG-to-energy facility, owned and operated by Energy 2001 Inc. under a lease agreement with WPWMA, is located on the northern side of the site. This facility generates electricity by running LFG through internal combustion engines. The Energy 2001 facility currently diverts up to 1,800 scfm of LFG from the flare station. The Energy 2001 facility also includes a small flare capable of handling up to 450 scfm of LFG and is capable of operating either as a stand-alone facility or in conjunction with the existing flare.

LFG Monitoring

In accordance with Section 20919.5 of Title 27, the WPWMA monitors the LFG detection probes on a monthly basis to verify that the concentration of methane gas does not exceed 25 percent of the lower explosive limit in facility structures (excluding gas control or recovery system components) and the lower explosive limit at the facility property boundary.

There are approximately 17 LFG monitoring points around the perimeter of the site. Additional monitoring probes may be added as the landfill continues to fill with waste over time. Prior to the placement of waste in a new module, perimeter gas monitoring probes are installed in accordance with Title 27 Section 20925, which requires nested probes at a minimum of 1 per 1,000 feet around the perimeter of the

landfill (as a whole, not by individual landfill module). Each LFG monitoring point includes one intermediate and one deep monitoring probe, with the deep one equal to the lowest waste elevation. In accordance with Title 27 Section 20921 requirements for the closed part of the landfill and Section 29025 for the active parts, these probes are monitored on a monthly basis. Reports of the monthly monitoring are presented to the LEA.

If methane gas levels exceed the specified levels, the WPWMA immediately takes necessary steps to protect human health and notifies the LEA within 7 days of detection. Within 60 days of a detection, the WPWMA would implement a remediation plan for the methane gas releases.

11.1.5 Regional Setting

Land uses within the vicinity of the proposed project include agriculture and grazing, and industrial and commercial activities. Placer County established restrictions on land use near landfills through General Plan Policy 4.G.11, such that residential land use is not permitted within 1 mile of an active landfill (Placer County 2013). However, in 2019, the County approved the Sunset Area Plan, which will allow new residential uses within 2,000 feet of WPWMA's property line with approval of a specific plan, master plan, or development agreement.

Existing Hazards

This subsection describes the existing hazards within the project vicinity. The proposed project is within the mapped boundary of the Placer County Sunset Area Plan (SAP 2019). Although the proposed Plan Concepts 1 and 2 do not include any additional regulated hazardous materials sites, regulated hazardous materials sites are located nearby including the Athens Industrial Area, Thunder Valley Casino Resort Wastewater Treatment Plant, and the Rio Bravo Rocklin Biomass Facility. Additionally, several former regulated hazardous materials sites are located just west of Industrial Avenue and south of Athens Avenue, within 3 miles of the project site. As described by Placer County, the Thunder Valley Casino Resort Wastewater Treatment Plant and Rio Bravo Rocklin Biomass Facility use hazardous materials, generate hazardous waste, and have regulated air and water discharges. The Athens Industrial Area, which is located within 0.5 mile of the WPWMA, consists of the CEMEX Lincoln cement plant, the PC Exploration company, several wood recycling operations, and the A&A concrete supply operation. These facilities use hazardous materials, generate hazardous waste, and have regulated air discharges. (Placer County 2019)

Agricultural Practices

Plan Concepts 1 and 2 would involve expansion of the WPWMA Waste Disposal and Waste Recovery activities to the western and eastern properties as described in Chapter 3, Project Description. According to Placer County, agricultural properties have historically stored, handled, and applied pesticides and herbicides as part of their practices (Placer County 2019).

In the western property, the southwestern area is currently leased to the City of Lincoln for discharge of reclaimed water. The southwestern area consists of agricultural land (pivot-irrigated alfalfa [*Medicago sativa*]) and non-native grasslands that are periodically mowed and baled. Other parts of the property involve agricultural irrigation. Much of the northwestern property appears to be regularly disturbed by burns and tilling, based on disked and furrowed roads and aerial photographs taken between 1993 and 2016 (Google Earth 2020).

The eastern property is undeveloped land. A motocross track, covering approximately 16 acres of the central part of the eastern property, was in operation for a few years starting in 2006 but has been inactive for many years. The eastern property is currently used for seasonal cattle grazing.

No known soil sampling for herbicides and pesticides have been performed on the western and eastern properties. Therefore, the hazards associated with past agricultural practices is currently unknown.

Vector Control

The project area is located within the boundaries of the Placer Mosquito and Vector Control District service area (Placer County 2019). The County established the Placer Mosquito and Vector Control District in 2018 to fund mosquito abatement. The district implements biological controls to reduce the mosquito population and prevent spread of diseases carried by mosquitoes. Biological controls include introducing natural enemies, including parasites, pathogens, and predators to manage mosquito populations. The district works with landowners to limit standing water, manage emergent vegetation, and maintain ditches and natural drains.

At the WRS�, the potential for vector problems are reduced by the covering of waste with daily soil cover or alternative daily cover and regular trash pickup throughout the site (Golder Associates 2017). After rain, where possible, WRS� staff patrol and drain areas that could collect standing water and provide mosquito-breeding areas. All areas that could potentially hold water are inspected weekly for mosquito larvae during rainy periods. Additionally, the site implements a bird control program that involves bird bomb and whistler cartridges to keep birds away from the site. Rodents have not previously been a problem at the site.

At the MRF, vector attraction and breeding are controlled by minimizing contaminants in the feedstock, frequently turning windrows, and maintaining the composting material at the proper temperature. Stockpiled feedstock finished compost and the leachate pond are inspected for evidence of vectors. Feedstock contamination is less than 1 percent, and with proper temperature control, there is no associated problem with rodents or insects. Additionally, when there is sufficient water in the leachate control pond, a pump will recirculate and aerate the water to minimize mosquito-related problems. The 11 operational and storage areas are cleaned routinely to prevent a build-up of materials that may attract vectors (Nortech 2020).

Wildfire Hazards

The project area is located on level to low-sloping terrain, in a rural area of Placer County. The majority of WPWMA properties are flat terrain, with the exception of the WRS� closed and active areas. The wildfire hazard in Placer County generally extends from early spring to late fall. A combination of factors could lead to an increased wildfire hazard including rising temperatures, accumulation of dry vegetation, and a decrease in the relative moisture content in air.

The State Board of Forestry identifies those lands where the California Department of Forestry and Fire Protection (CalFire) has the primary duty for wildland fire prevention and suppression; these lands are commonly known as SRAs. CalFire has developed a Fire Hazard Severity Scale that uses three criteria to evaluate and designate potential fire hazards in wildland areas: fuel loading (vegetation), fire weather (winds, temperatures, humidity levels, and fuel moisture contents), and topography (degree of slope). As shown on Figure 11-1, the proposed project is not located in a fire hazard security zone. The proposed project is located within a LRA, not a SRA (CalFire 2021).

As described by Placer County (2019), communities within the County are becoming more susceptible to wildfire risk due to past fire suppression efforts and increasing population. According to *the Placer County Community Wildfire Protection Plan*, the proposed project area lies within a wildland urban interface (WUI) boundary (Placer County 2019). The WUI consists of heavily vegetated areas where wildlands meet urban development. The number of people living in the WUI has increased. Fires in WUI areas would result in major losses of property and structures.

Placer County Local Hazard Mitigation Plan Update (LHMP) describes the FHSZs at the proposed project area as urban unzoned, non-wildland/non-urban, and moderate. Fire threat levels were mapped using CalFire FHSZs and wildfire data from its Fire and Resource Assessment Program. The proposed project area is at risk for smaller grassfires, especially during the dry, hot summers. In addition, the proposed project area is located within the Sunset Area Plan where the Cal-Adapt model, which presents potential effects under various climate-change scenarios, shows that the Sunset Area Plan area is projected to see a potential decrease in the number of acres burned by wildfire in 2085 as compared to 2020 projections. (Placer County 2019)

Schools

There are no existing schools within the proposed project area. The state CEQA Guidelines establish requirements for projects within 0.25 mile of a school so that the potential health impacts that may result from exposure to hazardous materials, wastes, and substances are examined for their potential significance. No schools were identified within 0.25 mile of the proposed project.

Airports

The state CEQA Guidelines establish that where a proposed project is located within 2 miles of a public airport or public use airport, it shall not result in a safety hazard for people residing or working within 2 miles of the airport. No public airports or public use airports are located within 2 miles of the proposed project.

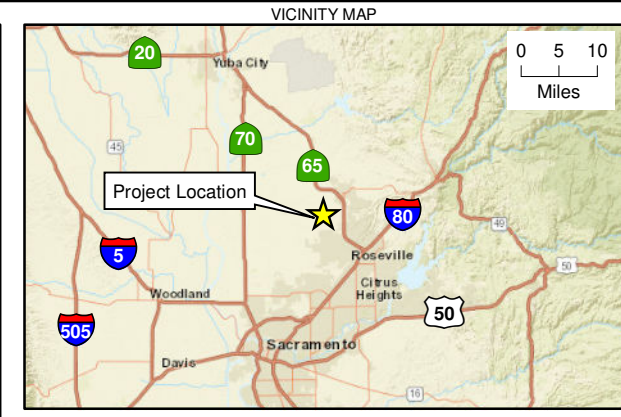
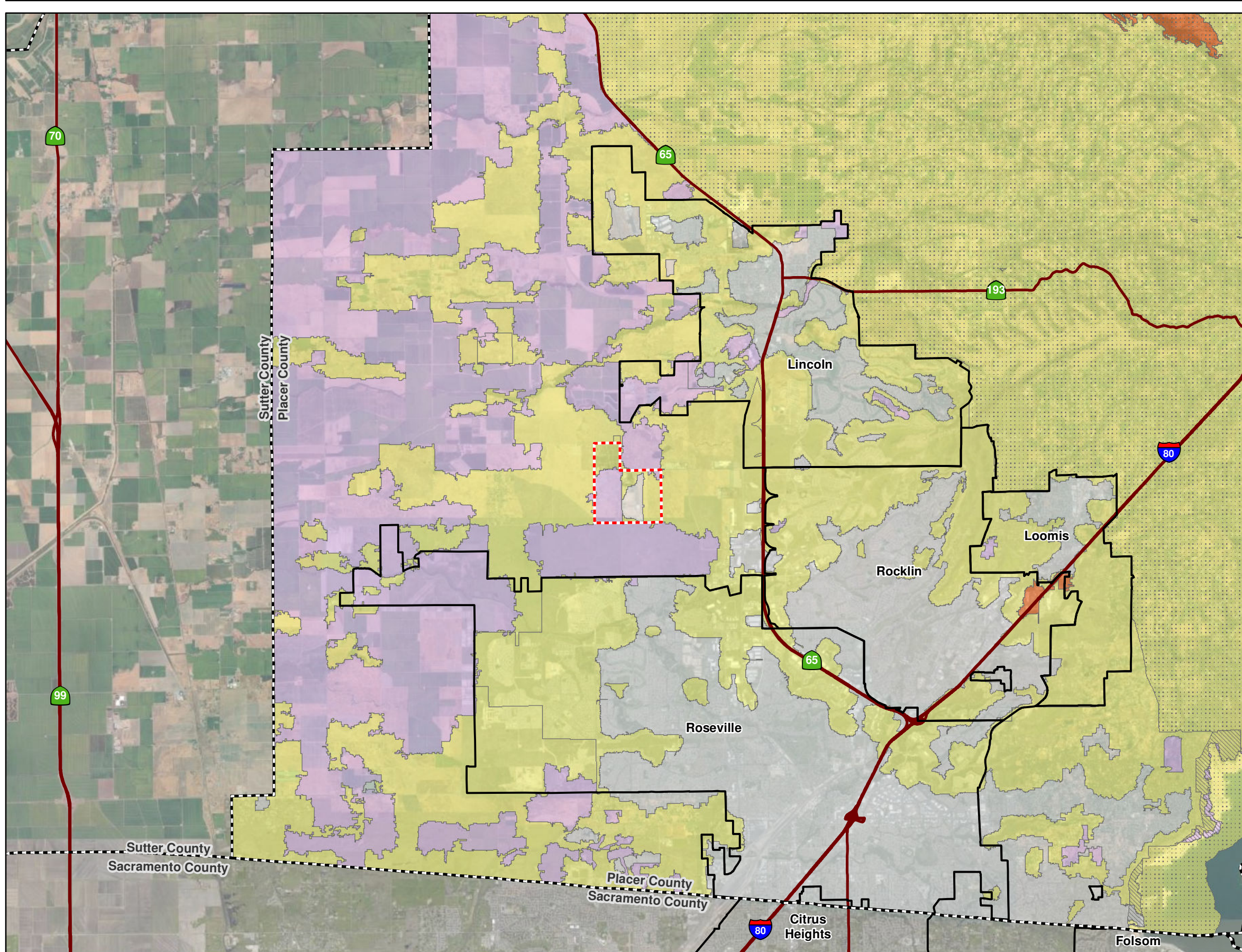
Emergency Response and Evacuation Plans

Placer County OES prepares and maintains evacuation plans and emergency operations plans. They provide emergency management services and respond to emergencies ranging from wildland fires to storm events to hazardous material incidents. During an active incident that requires emergency sheltering, such as a fire or a flood, OES secures resources necessary for first responders to protect the community (Placer County OES 2021). Placer County developed the 2016 LHMP in partnership with cities, towns, fire districts, and special districts. The goal of the plan is to guide hazard mitigation planning to better protect the people and property of the County from the effects of hazard events. It is an update to the 2010 FEMA approved Placer County Multi-Hazard Mitigation Plan.

The Draft 2017 Placer County Emergency Operations Plan addresses the planned response to emergency situations associated with natural disasters and emergencies (Placer County Department of Emergency Services 2017). It includes multiple annexes, one of which is the Mass Evacuation Annex. This annex addresses evacuation policies and procedures due to natural hazards and other events. The major evacuation routes in the regions include SR 65 (Placer County 2019). SR 65 is a four-lane highway in the vicinity of the project site and considered part of the project's regional road network.

11.2 Regulatory Setting

The local, state, and federal laws, regulations, and policies that pertain to protection of public safety from hazardous materials, hazardous waste, and wildfire are described in the following subsections. This section only addresses regulations related to the project operations discussed in Section 11.3 that may present hazards.



- LEGEND**
- Project Boundary
 - County Boundary
 - City Boundary
 - Highway
- Placer County Fire Hazard Severity Zones**
- Responsibility Areas**
- Federal
 - State
 - Local
- Hazard Classes**
- High
 - Moderate
 - Non-Wildland/Non-Urban
 - Urban Unzoned

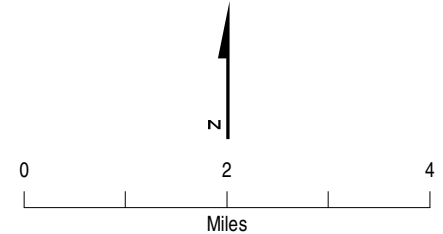


Figure 11-1. CalFIRE Fire Hazard Security Zones
 Draft Environmental Impact Report
 Renewable Placer: Waste Action Plan
 Placer County, California

11.2.1 Federal

United States Environmental Protection Agency

The U.S. Environmental Protection Agency (EPA) administers federal environmental laws and works with other federal agencies, state and local governments, and Indian tribes to develop and enforce environmental regulations. EPA researches and sets national standards for a variety of environmental programs that are implemented by states and tribes when issuing permits and monitoring and enforcing compliance.

Federal Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) enacted in 1976 provides EPA with the authority to require reporting, recordkeeping, and testing requirements of hazardous substances. TSCA also regulates the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

Resource Conservation and Recovery Act Hazardous and Solid Waste Act

The Resource Conservation and Recovery Act (RCRA) of 1976 was enacted to create a regulatory framework to manage waste from "cradle-to-grave." Implementation of the RCRA protects the public from harm caused by disposal, spilled or improperly stored wastes, and encourages reuse, reduction, and recycling. Management of wastes involves the collection, transportation, processing, recycling, or disposal of hazardous waste.

Hazardous Materials Transport Act

The Hazardous Materials Transport Act regulates the transportation of hazardous materials, types of hazardous materials, and vehicle marking during transport. The hazardous materials transportation regulations require carriers transporting hazardous materials to receive training in the handling and transportation of hazardous materials.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act, also referred to as the Business Plan Act, mandates that a business plan be prepared by businesses that use hazardous materials which describes the basic information regarding the location, type, quantity, and the health risks of hazardous materials handled, used, stored, or disposed, which could be accidentally released into the environment. This information provided by businesses is for the purpose of preventing or mitigating the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment. The WPWMA follows the guidance set forth in the Hazardous Materials Business Plan prepared for the facility (Nortech 2020).

Occupational Safety and Health Administration.

The United States Occupational Safety and Health Administration (OSHA) is an agency of the United States Department of Labor. It was created by the Congress of the United States in 1970 under the Occupational Safety and Health Act. Its mission is to provide safe working conditions by preventing work related injuries, illnesses, and occupational fatalities through the implementation of training, enforcement of regulations.

11.2.2 State

California Code of Regulations Title 27, Environmental Protection, Division 2, Solid Waste

Regulations covering waste disposal site operations are specifically defined in CCR Title 27, Division 2, Chapter 3, Sections 20550-20750. Section 20590 requires that operations and maintenance personnel wear and use approved safety equipment for personal health and safety. Section 20610 requires that personnel assigned to operate the site must be adequately trained in subjects pertinent to site operation and maintenance, hazardous materials recognition and screening, and heavy equipment operations, with emphasis on safety, health, environmental controls, and emergency procedures. Section 2615 specifies that the site operator is responsible for providing adequate numbers of qualified personnel to operate the site effectively related to environmental controls, emergencies, and health and safety. Adequate supervision is required by the site operator to comply with all applicable laws, regulations, permit conditions, and other requirements.

The WRS� is operated as a combined Class II and Class III facility. Class III facilities are those that accept MSW that is nonhazardous and is regulated under Title 27 CCR. Title 27 CCR also requires Class II and Class III MSW facilities to have a synthetic landfill liner. Class II facilities accept “designated” and nonhazardous wastes. This site is subject to the liner standards for both Class II and Class III, which includes a synthetic liner component. However, because the WRS� began operating prior to implementation of Subtitle D, the site includes a combination of non-Subtitle D and Subtitle D-compliant (composite) lined modules within the WRS� permitted footprint.

Title 27 regulations also set forth the performance standards and the minimum substantive requirements for landfill gas monitoring and control as it relates to active solid waste disposal sites and to proper closure, postclosure maintenance, and ultimate reuse of solid waste disposal sites so that public health and safety and the environment are protected from pollution related to the disposal of solid waste. Postclosure maintenance guidelines include requirements for an emergency response plan and site security. Construction on the site must maintain the integrity of the final cover, drainage and erosion control systems, and gas monitoring and control systems. All postclosure land uses within 1,000 feet of a landfill site and within the landfill property must be approved by the LEA.

Landfill Controls and Standards

In 1997, some of the solid waste regulations specific to landfills were adopted by the SWRCB (Title 23, Chapter 15) and combined with CalRecycle regulations (Title 14) to form Title 27 of the CCR. Based on this, Title 27 CCR incorporates regulations of the SWRCB and the CalRecycle that apply to Waste Disposal on land. Minimum standards related to solid waste handling and disposal are defined in Title 27 CCR, Division 2, Chapter 3. Landfill disposal site controls for public health and safety detailed in Articles 4 and 6 contain:

- Section 20760, Nuisance Control. Each disposal site shall be operated and maintained so as not to create a public nuisance.
- Section 20790 Leachate. The operator shall ensure that leachate is controlled to prevent contact with the public.
- Section 20800. Dust Control. The operator shall take adequate measures to minimize the creation of dust and prevent safety hazards due to obscured visibility.

- Section 20810. Vector and Bird Control. The operator shall take adequate steps to control or prevent the propagation, harborage or attraction of flies, rodents, or other vectors and to minimize bird problems.
- Section 20870. Hazardous Wastes. Owners or operators of all municipal solid waste landfill (MSWLF) units must implement a program at the facility for detecting and preventing the disposal of regulated hazardous wastes as defined in 40 CFR Part 261 and polychlorinated biphenyls (PCB) wastes as defined in 40 CFR Part 761.
- Section 20919. Gas Control. Where the Enforcement Agency (EA) [or LEA], the local fire control authority, the local building authority, or the CalRecycle has sufficient relevant information to believe a hazard or nuisance is being or may be created by landfill gas, it shall so notify the operator. The local fire control authority and the local building authority shall also notify the EA [or LEA] and the CalRecycle. Thereafter, as directed by the EA [or LEA], the local fire control authority, the local building authority, or the CalRecycle, the site operator shall cause the site to be monitored for presence and movement of landfill gas and shall take necessary action to control such gas. The monitoring program shall be developed pursuant to the specifications of the above agencies. The monitoring program shall not be discontinued until authorized to do so in writing by the requiring agency. Results of the monitoring shall be submitted to the appropriate agencies. If monitoring indicates landfill gas movement away from the site, the operator shall, within a period of time specified by the requiring agency, construct a gas control system approved by that agency. The agency may waive this requirement if satisfactory evidence is presented demonstrating that adjacent properties are safe from hazard or nuisance caused by landfill gas movement. The operator shall duly inform the EA [or LEA] of possible landfill gas problems.

CalRecycle (California Department of Resources Recycling and Recovery). Title 14 CCR, Natural Resources, Division 7.

CalRecycle is responsible for managing California's solid waste stream. This includes the regulation of waste discharge for treatment, storage, and disposal in waste management units such as waste piles, surface impoundments, and landfills, as well as transfer and processing facilities (i.e., MRF and C&D processing facilities) and composting operations.

Title 14 CCR, Division 7, Chapter 3 establishes minimum regulatory standards for solid waste management, handling and disposal as well as operating standards pertaining to health and safety. Chapter 5 establishes guidelines for enforcement of solid waste standards and administration of solid waste facilities permits. Article 6.2 of Chapter 3 establishes minimum operating standards for operations and facilities that receive, store, handle, recover, transfer, or process solid waste, which include the following:

- Section 17407.5. Hazardous, Liquid, and Special Wastes. (1) An operation or facility shall not intentionally accept or store hazardous wastes, including batteries, oil, paint, and special wastes, unless it has been approved to handle the particular waste by the appropriate regulatory agencies. Such approvals shall be placed in the operating record. (2) At operations and facilities where unauthorized hazardous wastes are discovered, control measures as are necessary to protect public health, safety and the environment, such as elimination or control of dusts, fumes, mists, vapors or gases shall be taken prior to isolation or removal from the operation or facility, (3) Liquid wastes and sludges shall not be accepted or stored at an operation or facility unless the operator has written approval to accept such wastes from the appropriate agencies and the EA. The EA shall authorize acceptance of these wastes only if the operation, facility, and the transfer vehicles are properly equipped to handle such wastes in a manner to protect public health, safety, and the environment.

- Section 17408.1. Litter Control. Litter at operations and facilities shall be controlled, and routinely collected to prevent safety hazards, nuisances or similar problems and offsite migration to the greatest extent possible given existing weather conditions.
- Section 17408.2. Medical waste, unless treated and deemed to be solid waste, which is regulated pursuant to the Medical Waste Management Act (commencing with Section 117600 of the *Health and Safety Code*), shall not be accepted at an operation or facility, unless approved by the appropriate regulatory agency.
- Section 17408.7. Personnel Health and Safety. The Injury, Illness, and Prevention Program shall be available for review by local and state inspectors during normal business hours. Nothing in this section is intended to make the local enforcement agency responsible for enforcing the Injury, Illness, and Prevention Program.
- Section 17409.5. Load checking. The operator of an attended operation or facility shall implement a load-checking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum (1) the number of random load checks to be performed, (2) a location for the storage of prohibited wastes removed during the load-checking process that is separately secured or isolated, and (3) records of load checks and the training of personnel in the recognition, proper handling, and disposition of prohibited waste. A copy of the load-checking program and copies of the load-checking records for the last year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.
- Section 17410.3. Training. Personnel assigned to the operation or facility shall be adequately trained in subjects pertinent to site solid waste operations and maintenance, hazardous materials recognition and screening, use of mechanized equipment, environmental controls, emergency procedures and the requirements of this Article. A record of such training history shall be maintained and made available for inspection.
- Section 17410.4. Vector, Bird and Animal Control. The operator shall take adequate steps to control or prevent the propagation, harborage and attraction of flies, rodents, or other vectors, and animals, and to minimize bird attraction.

State Water Resources Control Board – Central Valley Region

The SWRCB administers Title 27 CCR (Discharges of Waste to Land), which regulates the discharge to land of certain solid and liquid wastes (including municipal solid wastes).

Federal Occupational Safety and Health Administration (Fed/OSHA) and California Occupational Safety and Health Administration (Cal/OSHA)

Cal/OSHA has the primary responsibility for developing and enforcing state workplace safety regulations. The Cal/OSHA program is a federally approved OSHA program, which adopts and implements regulations that are at least as stringent as those found in Title 29 CFR.

Cal/OSHA is a California State Program implemented to protect the health and safety of workers. Worker safety requirements are to protect employees from workplace hazards or that come into contact with or handle hazardous materials or potentially hazardous wastes. Both the federal OSHA (Fed/OSHA) and Cal/OSHA require mandatory site safety plans. The typical provisions of the site safety plans are for safety training, safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency response and fire prevention plan preparation.

Both Cal/OSHA and Fed/OSHA enforce worker safety when handling and using chemicals in the workplace. As a result of the Occupational Safety and Health Act of 1970, Fed/OSHA has incorporated the CFR Title 29 regulations pertaining to worker safety and safe work practices.

Cal/OSHA implements regulations specific to use of hazardous materials in the workplace, as described in Title 8, CCR. These requirements specify the elements of safety training, accident and illness prevention programs, safety equipment availability, guidance for hazardous substance exposure warnings, and specifics on the preparation of and emergency action and fire prevention plans. To protect workers and employees at hazardous waste sites, Cal/OSHA also stipulates hazard communication program requirements related to training and procedures for identifying and labeling hazardous substances, communication of hazard substance information, procedures for their proper handling, and preparation of health and safety plans.

Assembly Bill 2948 – County Hazardous Waste Management Plans

In 1986, the State Assembly passed AB 2948 authorizing counties to develop hazardous waste management plans. The purpose of the plans is to adequately treat wastes generated within individual counties and provide sufficient disposal capacity for the hazardous wastes being generated. The Placer County Hazardous Waste Management Plan was adopted by Placer County in 1988.

Hazardous Waste Control Act, 1972

The Hazardous Waste Control Act of 1972 created the state hazardous waste management unit within the Department of Health Services. This law was more comprehensive than the federal program and would later become the model for RCRA.

Department of Toxic Substance Control

In 1976, RCRA was enacted providing federal and state regulation of hazardous waste. The State of California manages hazardous materials and waste through the jurisdiction of the California Environmental Protection Agency (CalEPA), and the DTSC. CalEPA oversees California's Unified Program, which allows them to confirm that local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities. The Certified Unified Program Agencies implement the Unified Program under California *Health and Safety Code* Division 20, Chapter 6.11.

California Department of Forestry and Fire Protection

CalFire is dedicated to the fire protection and stewardship of more than 31 million acres of California's privately owned wildlands. In addition, CalFire provides varied emergency services in 36 of the state's 58 counties via contracts with local governments (CalFire 2020).

California Fire Code

The 2016 *California Fire Code* is based on the *International Fire Code* from the International Code Council and contains consensus standards related to establishing good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new or existing buildings, structures, and premises.

Hazardous Waste Control Law

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Title 27 CCR) was mandated by the State of California in 1993. The Unified Program has six elements, including the Uniform Fire Code Hazardous Materials Management Plans and Hazardous Materials Inventory Statements.

At the local level, this program is accomplished by identifying a Certified Unified Program Agency that coordinates all of these activities to streamline the process for local businesses. The Placer County Health and Human Services Department serves as the Certified Unified Program Agency for Placer County.

11.2.3 Local

The WPWMA is a Joint Powers Authority (JPA) composed of Placer County and the cities of Lincoln, Rocklin, and Roseville to own and operate a regional recycling facility and sanitary landfill. As a JPA, the WPWMA considers local regulations and consults with local agencies, but County and city regulations are not applicable, because the County and cities do not have jurisdiction over the proposed project. Accordingly, the following discussion of local goals and policies associated with hazards, hazardous materials, and wildfire is provided for informational purposes only.

Placer County Environmental Health Department

The Placer County Health and Human Services Department – Environmental Health Division is the designated Local Enforcement Agency for issuing and enforcing the requirements of Solid Waste Facility Permits. The Placer County Health and Human Services Department is also the designated Certified Unified Program Agency for Placer County coordinating administrative activities related to HHW permits, inspections, and enforcement.

Placer County General Plan

The Placer County General Plan includes policies related to hazards and hazardous materials in Section 8, pertaining to Health and Safety (Placer County 2013).

Fire Hazards (Section 8C of the Placer County General Plan, Policies 8.C.1 through 8.C.12) are described below. The goal of the Fire Hazards Policies in the General Plan is to minimize the risk of loss of life, injury, and damage to property and watershed resources resulting from unwanted fires.

- 8.C.1. The County shall ensure that development in high-fire-hazard areas is designed and constructed in a manner that minimizes the risk from fire hazards and meets all applicable state and County fire standards.
- 8.C.2. The County shall require that discretionary permits for new development in fire hazard areas be conditioned to include requirements for fire-resistant vegetation, cleared fire breaks, or a long-term comprehensive fuel management program. Fire hazard reduction measures shall be incorporated into the design of development projects in fire hazard areas.
- 8.C.3. The County shall require that new development meets state, County, and local fire district standards for fire protection.
- 8.C.4. The County shall refer development proposals in the unincorporated County to the appropriate local fire agencies for review for compliance with fire safety standards. If dual

responsibility exists, then both agencies shall review and comment relative to their area of responsibility. If standards are different or conflicting, the more stringent standards shall be applied.

- 8.C.10. The County shall continue to implement state fire safety standards through enforcement of the applicable standards contained in the Placer County Land Development Manual.

Hazardous Materials (Section 8G of the Placer County General Plan, Policies 8.G.1 through 8.G.13) are described below. The goal of the Hazardous Materials Policies in the General Plan is to minimize the risk of loss of life, injury, serious illness, damage to property, and economic and social dislocations resulting from the use, transport, treatment, and disposal of hazardous materials and hazardous materials wastes.

- 8.G.1. The County shall ensure that the use and disposal of hazardous materials in the County complies with local, state, and federal safety standards.
- 8.G.3. The County shall review all proposed development projects that manufacture, use, or transport hazardous materials for compliance with the County's Hazardous Waste Management Plan (CHWMP).
- 8.G.5. The County shall strictly regulate the storage of hazardous materials and wastes.
- 8.G.6. The County shall require secondary containment and periodic examination for all storage of toxic materials.
- 8.G.7. The County shall ensure that industrial facilities are constructed and operated in accordance with current safety and environmental protection standards.
- 8.G.8. The County shall require that new industries that store and process hazardous materials provide a buffer zone between the installation and the property boundaries sufficient to protect public safety. The adequacy of the buffer zone shall be determined by the County.
- 8.G.9. The County shall require that applications for discretionary development projects that will generate hazardous wastes or utilize hazardous materials include detailed information on hazardous waste reduction, recycling, and storage.
- 8.G.10. The County shall require that any business that handles a hazardous material prepare a plan for emergency response to a release or threatened release of a hazardous material.

Placer County Ordinance Codes

Chapter 9, Public Peace, Safety and Welfare, Article 9.32 Fire Prevention, Part 4, Section 9.32.160, includes the requirement that property owners, occupants, and person in control of any improved or unimproved parcel of land located in the unincorporated territory of Placer County must abate hazardous vegetation as defined in the code.

Chapter 9, Public Peace, Safety and Welfare, Article 9.32 Fire Prevention, Part 4, Section 9.32.120, describes the Hazardous Vegetation Abatement Ordinance, which requires property owners to maintain 100 feet of space around buildings/structures to help prevent fires.

Placer County Uniform Fire Code

Placer County has adopted CCR Fire Code (Sections 15.04.700 and 15.04.710 Fire Code Amendment). The Fire Code contains regulations relating to construction, maintenance, and use of buildings and provides guidance on emergency access, access gates, sprinkler systems, fire alarms within buildings, and construction of access roads to accommodate fire responders.

Airport Land Use Compatibility Plan

The Placer County Airport Land Use Compatibility Plan specifies policies and boundaries that have been established for the Lincoln Regional Airport, which is located approximately 4 miles to the north of the proposed project. The plan lists general land use categories and indicates each use as being “normally compatible,” “conditional,” or “in-compatible” depending upon the compatibility zone in which it is located. The proposed project is located outside of these designated compatibility zones (Placer County Transportation Planning Agency 2014). McClellan Air Force Base (AFB) is located approximately 10 miles to the south of the proposed project. The McClellan Air Force Base Comprehensive Land Use Plan establishes compatibility guidelines applicable to different land uses including sanitary landfills (McClellan AFB 1992). The proposed project is not located within any areas subject to the McClellan AFB compatibility use restrictions.

11.3 Impact Analysis and Mitigation Measures

11.3.1 Thresholds of Significance

The thresholds of significance for assessing impacts related to hazards, hazardous materials, and wildfire come from the CEQA Environmental Checklist. For Hazards and Hazardous Materials, the CEQA Checklist asks if the project would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site that is included on a list of hazardous material sites, compiled pursuant to *Government Code* Section 65962.5, and as a result would create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would result in a safety hazard or excessive noise for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

For wildfire, the CEQA Checklist asks, if located in or near SRAs or lands classified as very high-fire-hazard severity zones, if the project would do the following:

- Substantially impair an adopted emergency response plan or emergency evacuation plan?
- Expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire because of the surrounding slope, prevailing winds, and other factors that exacerbate wildfire risks?
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

11.3.2 Impacts

This section describes the hazards, hazardous materials, and wildfire impacts associated with the two plan concepts, mitigation measures for identified significant impacts, and the level of impact significance following implementation of the identified mitigation measures.

IMPACT 11-1	Potential for Construction Activities to Expose the Public or the Environment to Hazardous Materials. Construction of the proposed project may involve routine transport, use, and disposal of hazardous materials including fuels and petroleum-based fluids. Additionally, construction activities may result in exposure to contaminated soils during excavation activities. Therefore, project impacts would be significant .
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Plan Concept 1

Sitewide.

Hazardous materials that are typically used during construction associated with the solid waste management operations at the WPWMA facility would require the transport, storage, and use of fuels, and other primarily petroleum-based fluids for the servicing and maintenance of vehicles and equipment. Hazardous materials used during construction may include acids, lime, glues, paints, solvents, and curing compounds.

An inadvertent spill of one or more of these hazardous materials could potentially occur during construction activities. An Emergency Response and Contingency Plan for WPWMA's existing facility is described in the facility's 2020 Hazardous Materials Business Plan. The Emergency Response and Contingency Plan includes emergency contacts, processes that are used to store/handle hazardous materials, a list of hazardous materials that are used, the quantities and locations of hazardous materials used, the notifications to be made in the event of a spill, the evacuation plan, spill containment and cleanup procedures, treatment procedures for injuries, and training for employees.

Additionally, as part of construction, a SWPPP (as discussed in Chapter 12, Hydrology) would implement BMPs to prevent releases of hazardous materials and contain and clean up any accidental releases that might occur. If hazardous wastes are transported onsite during construction, it would be transported in compliance with U.S. DOT, EPA, California Highway Patrol, and DTSC regulations. Impacts to the public and environment would be minimized with continued implementation of WPWMA's Hazardous Materials Business Plan, SWPPP, and compliance with local, state, and federal regulations.

However, even with implementation of the above measures for proposed expanded operations on the center property, the project is proposed to expand solid waste operations on the western and eastern properties where the risks associated with past agricultural practices are currently unknown. Construction on the western and eastern properties could result in the exposure of workers or the environment to soils that have been contaminated by prior agricultural operations. Due to the public health concerns associated with this exposure, this impact would be significant.

Complementary and Programmatic Elements.

In addition to solid waste elements complementary and programmatic may be developed on WPWMA properties. Under the project level, for Plan Concept 1, up to 300,000 square feet of building plus exterior infrastructure are reserved in the northern part of the western property for the complementary solid waste management elements. Under the programmatic level, for Plan Concept 1, up to 1.9 million square feet have been reserved for these elements primarily within the northern and southern extents of the western property, and on the center property. However, opportunities may arise that would support locating some of these complementary and programmatic elements nearer to the solid waste project elements or within areas not yet developed with solid waste project elements.

Construction activities associated with the project level of complementary elements include excavating for utilities and building foundations and grading for internal roadways and parking lots. These construction activities have the potential to expose contaminated soils. Therefore, construction of the project level of complementary elements may have a significant impact.

Build out of the programmatic elements involve the same construction activities identified for the project level. Construction of the additional programmatic elements (1.6 million sf) also have the potential to expose contaminated soils. Therefore, construction of the program level of complementary and programmatic elements may have significant impact.

Plan Concept 2

As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on WPWMA's property and when various facilities would be developed. These differences do not change the conclusions identified for Plan Concept 1. As such, impacts associated with implementation of Plan Concept 2 would be the same as described for Plan Concept 1.

Mitigation Measure 11-1: Potential for Construction Activities to Expose the public or the environment to Hazardous Materials.

A Phase I ESA shall be prepared prior to the construction of any facilities on the western or eastern properties in general conformance with the ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and EPA "Standards and Practices for All Appropriate Inquires," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the WPWMA shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted. Any remediation recommendations shall be implemented before earth disturbance in the vicinity of the contamination.

In addition, a construction hazardous materials management plan shall be prepared by the WPWMA or the WPWMA's construction-manager/contractor for all future development projects on the western and eastern properties and shall be incorporated into the construction and contract specifications for each project. The management plan shall include measures to reduce potential hazards to workers, the public, and the environment associated with use of hazardous materials and exposure to potentially contaminated soil during project construction. The management plan shall include provisions managing impacted materials, sampling and analytical requirements and disposal procedures. Specifically, the construction hazardous materials management plan shall:

- Describe the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction.
- Describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials.
- Include measures to protect worker safety if signs of contamination are encountered.
- Identify sampling and analysis protocols for various substances that might be encountered.
- List required regulatory agency contacts if contamination is found.
- Include recommendations on soil management in the event that aerially deposited lead is discovered in existing road right-of-way.
- Identify legal and regulatory processes and thresholds for cleanup of contamination.
- Include provisions for delineation, removal, and disposal of any contaminants identified as exceeding human health risk levels.
- Require that the project contractor verify that suspect soils are isolated, protected from runoff, and disposed of in accordance with Section 31303 of the *California Vehicle Code* and the requirements of the licensed receiving facility.

Level of Significance after Mitigation.

Implementation of these mitigation measures would reduce the potential for construction activities to expose the public or environment to hazardous materials and this impact would be reduced to a **less-than-significant** level.

IMPACT 11-2	Potential for Solid Waste Operating Activities to release hazardous materials into the environment. The project involves the increased delivery of waste materials to the site and the potential for hazardous waste to be illegally or accidentally delivered to the site in loads of municipal solid waste. Growth in the household hazardous waste stream would also be expected to result in greater quantities of household hazardous waste being processed at and stored on the site. With the continued implementation of the existing load-checking program, waste acceptance procedures, and compliance with the solid waste permitting requirements, impacts from the proposed project would be less than significant .
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Plan Concept 1

The proposed project would continue to operate in conformance with the facility's permit conditions, and the project would implement additional practices to minimize the potential for hazardous wastes to commingle with solid waste loads through the placement of signage and through a load-checking program. Project personnel would continue to implement visual inspections at the scale house for obvious items that may be hazardous and that are not accepted at the site or should be directed to the HHW facility, such as the following:

- Adhesives/putties/fillers
- Asbestos-containing wastes
- Automotive products
- Cosmetics/medicines
- Gas cylinders (compressed)

- Cleaners/drain openers
- Waxes/polishes
- Paints/varnishes/lacquers
- Pesticides/herbicides/fertilizers
- Pool chemicals
- Roof coatings/cements
- Roofing tar
- Solvents/thinners/paint removers

The proposed project would continue to implement the load-checking program at the MRF and WRSL. Self-haul vehicles going to the MRF, public waste drop-off area, organics management area, or C&D processing area would be screened at one of the scale house areas. The load-checking program is intended to identify and remove hazardous and otherwise prohibited wastes from the waste stream prior to disposal. The staff at each scale house routinely question self-haul customers regarding the presence of household hazardous materials or unacceptable material in their loads, and the proposed project would continue to implement these screening procedures. The questioning of self-haul customers by scale house and other operating personnel may involve physical assessment of the product, inspection for warning labels such as “flammable” or “poison,” and inspection for unidentified containers that may contain unacceptable wastes.

After screening the loads, the self-haul customers would be directed to the appropriate areas within each facility for unloading materials. The proposed project would continue to utilize spotters who would generally conduct load content surveillance near the unloading areas. Waste inspections would consist of a detailed examination of randomly selected loads consistent with the MRF and WRSL Solid Waste Facility Permits. If hazardous materials are found at any of the waste receiving, processing, or disposal areas, they would be transported to and temporarily stored in a hazardous waste containment structure designed specifically for that purpose. Hazardous wastes would be stored for no longer than the time period allowed by State regulations (per Title 22, CCR, §66262.34(c)(1)). Licensed haulers would remove any hazardous waste encountered onsite.

The WPWMA has a CalEPA generator number for storage of hazardous/prohibited wastes in the onsite containment structure. Inspection records regarding the detection of hazardous waste, the training procedures for personnel, and the notification of hazardous waste required in Section 20870 of CCR Title 27 are maintained at the site. Records documenting the waste load-checking program are maintained at the site and submitted to regulatory agencies as required. The records are open to inspection during normal business hours. Inspection records by regulatory agencies are also kept at the facility. The proposed project would continue to implement these requirements for all future Waste Disposal and Waste Recovery operations. Because the proposed project would continue to operate in compliance with solid waste permitting requirements, Title 22 State regulations, and would also continue to implement practices such as the load-checking program, impacts from the proposed project are less than significant.

Plan Concept 2

As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on WPWMA's property and when various facilities would be developed. As such, impacts related potential for exposure of the public or the environment to hazardous materials as a result of implementation of Plan Concept 2 would be the same as described for Plan Concept 1.

IMPACT 11-3	Potential for landfill gas to accumulate in occupied structures. The proposed project may result in migrating LFG intrusion within 1,000 feet of the landfill. Therefore, proposed project impacts would be significant .
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Plan Concept 1

The landfill generates LFG that could potentially accumulate in occupied structures developed on WPWMA properties for the proposed project. WPWMA is required to comply with CCR Title 27 Section 22190, which states that all onsite construction within 1,000 feet of the boundary of any disposal area shall be designed and constructed to mitigate gas migration into a structure. These state standards are in place to minimize potential intrusion of migrating LFG into a structure. The protection measures identified in Title 27 Section 22190 are important for minimizing this potential public safety risk, and if these measures were not implemented for the proposed project, the project impacts could be significant.

Plan Concept 2

As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on WPWMA's property and when various facilities would be developed. As such, impacts related potential for exposure of the public or the environment to hazardous materials as a result of implementation of Plan Concept 2 would be the same as described for Plan Concept 1.

Mitigation Measure 11-3: Potential for landfill gas to accumulate in occupied structures.

For any structure sited within 1,000 feet of the WRS within the project's boundary, the following measures specified in CCR Title 27 Section 21190(g) shall be included:

- A geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade.
- A permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade or slab.
- A geotextile filter shall be used to prevent the introduction of fines into the permeable layer.
- Perforated venting pipes shall be installed within the permeable layer and shall be designed to operate without clogging.
- The venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system.
- Automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected.

In addition, WPWMA shall use a qualified specialist to conduct periodic methane gas monitoring (pursuant to CCR Section 20920 et. seq.) inside all buildings and underground utilities.

Level of Significance after Mitigation.

Implementation of Mitigation Measure 11-3 would reduce the proposed project's potential impact to a **less-than-significant** level.

IMPACT 11-4	Potential for Waste Relocation Activities to release hazardous materials into the environment. The waste excavation and relocation component of the proposed project has the potential to expose onsite personnel or the environment to hazardous materials. Project impacts would be significant .
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Plan Concept 1

As described in Chapter 3, Project Description, Plan Concept 1 includes excavating the contents of Modules 1, 2, 10, and 11, which encompass approximately 66 acres, and relocating these contents to a Subtitle D-compliant lined module within the permitted landfill footprint. Under Plan Concept 1, the duration of the waste excavation and relocation is estimated to occur over approximately 5 years. Waste relocation activities at the pre-Subtitle D area would include removal of leachate and landfill gas collection infrastructure, buried waste, soil cover, and as appropriate, any underlying soils already affected by a release from the landfill and potentially posing a threat to water quality or the environment. The estimated total volume of waste material within the pre-Subtitle D modules is 3,646,000 cubic yards (Golder Associates Inc. 2018). This includes final cover soils, Class III nonhazardous solid waste, and daily and interim soil cover. The Class III nonhazardous solid waste is assumed to include mixed municipal wastes, C&D debris, yard wastes and rubbish, and inert materials such as concrete and white goods (e.g., appliances) (Golder Associates Inc. 2018).

The WPWMA would require contractors performing waste excavation activities to be trained to observe the excavation process to identify any nonconforming waste materials, including hazardous waste, which would be sent offsite for proper handling and would not be relocated to an onsite landfill module for reburial. Trained personnel would also observe the exposed subgrade soils to identify any areas that may be affected by a release from the landfill (Golder Associates Inc. 2018).

Although it is anticipated that primarily MSW would be encountered, there is the potential for onsite personnel to encounter hazardous waste during the waste relocation activities. The exposure onsite personnel or the environment to hazardous wastes associated with these waste relocation activities would be a significant impact.

Plan Concept 2

As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on the WPWMA's property and when various facilities would be developed. Under Plan Concept 2, the duration of waste excavation and relocation would be conducted over a shorter period of time (a total of approximately 3 years) than Plan Concept 1. As such, impacts related potential for exposure of the public or the environment to hazardous materials as a result of implementation of Plan Concept 2 would be the same as described for Plan Concept 1.

Mitigation Measure 11-4: Potential for Waste Relocation Activities to release hazardous materials into the environment.

As described in Chapter 3, Project Description, prior to commencing waste relocation activities, the WPWMA shall develop and implement a contingency plan in case hazardous wastes are encountered during waste relocation. The contingency plan shall be based on guidelines issued by the State of California Governor's Office of Emergency Services (CA OES 2001) for preparation of a Hazardous Material

Incident Contingency Plan that describes emergency procedures and actions to be implemented to minimize hazards and release hazardous materials.

Level of Significance after Mitigation.

Implementation of Mitigation Measure 11-4 would reduce the proposed project’s impact associated with waste relocation activities to **less than significant**.

IMPACT 11-5	Potential Conflict with an Adopted Emergency Response Plan. The proposed project is not expected to conflict with implementation of an adopted emergency response plan. However, construction activities on local roadways may require temporary lane closures that could delay emergency evacuation. This impact would be significant .
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Plan Concept 1

Sitewide.

An Emergency Response and Contingency Plan for the WPWMA facility is described in the facility’s 2020 Hazardous Materials Business Plan. The Emergency Response and Contingency Plan includes the emergency contacts, processes that are used store/handle hazardous materials, a list of hazardous materials that are used, the quantities and locations of hazardous materials used, the notifications to be made in the event of a spill, the evacuation plan, spill containment and cleanup procedures, treatment procedures for injuries, and training for employees. Because the solid waste elements of the proposed project would not substantially differ from the solid waste activities that currently occur at the site, the proposed project would not be expected to conflict with the facility’s Emergency Response and Contingency Plan.

The proposed project is not expected to impair implementation of, or physically interfere with, the Placer County emergency response plan or emergency evacuation plan. SR-65 is a major evacuation route near the project area. The proposed project would not be expected to have any effect on the use of SR-65 for emergency evacuations.

During construction activities, temporary lane closures may be necessary on Fiddymment Road and Athens Avenue. These lane closures could result in temporary increases in traffic levels as traffic is detoured or slowed on some local roadways. Increased traffic congestion on Fiddymment Road and Athens Avenue during construction would be temporary and would not interfere with the use of surrounding roadways, including SR-65, for emergency evacuation. However, localized delays in emergency evacuation could occur. Substantial delays in emergency evacuation associated with project construction activities on local roadways would be considered a significant impact.

Complementary and Programmatic Elements.

In addition to solid waste elements, complementary and programmatic elements may be developed on WPWMA properties. Under the project level, for Plan Concept 1, up to 300,000 square feet of building plus exterior infrastructure is reserved in the northern part of the western property for the complementary solid waste management elements. Under the programmatic level, for Plan Concept 1, up to 1.9 million square feet has been reserved for these elements primarily within the northern and southern extents of the western property, and on the center property. However, opportunities may arise that would support locating some of these complementary and programmatic elements nearer to the solid waste project elements or within areas not yet developed with solid waste project elements.

Development of the project level of complementary elements would be in accordance with WPWMA's Emergency Response and Contingency Plan or a separate site-specific individual emergency response plan. The complementary elements are not expected to interfere with Placer County's emergency and evacuation plans. Temporary lane closures associated with construction of these elements could cause or contribute to temporary increases in traffic levels but would not interfere with the use of surrounding roadways, including SR-65, for emergency evacuation. However, localized delays in emergency evacuation could occur. Substantial delays in emergency evacuation associated with complementary element construction activities on local roadways would be considered a significant impact.

Build out of the programmatic elements involve the same construction activities identified for the project level. Development of the additional programmatic elements (1.6 million square feet) may also result in localized delays in emergency evacuation. Therefore, impacts associated with development of the program level of complementary and programmatic elements could be significant.

Plan Concept 2

As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on WPWMA's property and when various facilities would be developed. These differences do not change the conclusions identified for Plan Concept 1. As such, impacts related to conflicts with an adopted emergency response plan as a result of implementation of Plan Concept 2 would be the same as described for Plan Concept 1.

Mitigation Measure 11-5: Prepare a Construction Traffic Management Plan.

Before construction activities commence, the WPWMA shall prepare a Construction Traffic Management Plan to minimize traffic impacts on all roadways at and near the work site affected by construction activities. The plan shall identify construction and public (if applicable) access points, procedures for notification of lane closures, a construction materials delivery plan, and a description of emergency personnel access routes during lane closures. This plan shall include measures that provide adequate access for emergency evacuation, including maintaining bypass lanes around any roadway construction sites.

Level of Significance after Mitigation.

Implementation of Mitigation Measure 11-5 would reduce the proposed project's potential impact on an adopted emergency response plan to a **less-than-significant** level.

IMPACT 11-6	Risk of Wildfire. The proposed project is not located in an area of substantial wildfire risks or hazards and would not be expected to increase risks associated with wildfire. The expanded solid waste operations would include specific operational procedures that would minimize the potential for wildland fires to be started on the site. Also, the compatible/programmatic uses would be subject to applicable regulations that would minimize wildfire risks. Therefore, project implementation would have a less-than-significant impact on wildfire risk.
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Plan Concept 1

Sitewide.

Areas at risk for wildfires are designated by CalFire and include lands with characteristics of dense vegetation where severe burning potential is present. As described in the Environmental Setting Section, there are no lands in the vicinity of the proposed project that are categorized by the County or CalFire as either (1) wildland areas that may contain substantial forest fire risks and hazards (wildland areas or SRA) or (2) very high-fire-hazard severity zones. As described in the Placer County LHMP Update, parts of the site are located within a moderate fire hazard zone, and the project area is at risk to smaller grassfires, especially during the dry, hot summers. To minimize hazards associated with potential grassfires, the WPWMA implements practices of vegetation clearing, storage of water nearby vegetated areas, and stockpiling soil that can be used to extinguish small grass fires. In addition, fire safety practices onsite would be implemented in accordance with Cal/OSHA standards as discussed in Section 11.2.2. Cal/OSHA requires mandatory site safety plans that may include emergency response and fire prevention plan preparation.

Because the proposed project would comply with Cal/OSHA fire standards and would implement the WPWMA's Emergency Response and Contingency Plan including practices that minimize wildfire hazards, people or structures would not be subject to the risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

The proposed project includes the construction or expansion of structures and infrastructure at the site. Solid waste material contains combustible components and the operation of solid waste facilities can result in fire risks. The introduction of new or expanded structures and the expansion of solid waste operations at the site could increase this risk.

Fire risks at solid waste facilities are largely associated with the following:

- Equipment-sparked fire caused by faulty electrical connections
- Ignition of collected refuse or dry vegetation on or near the equipment
- Smoldering refuse occasionally brought into the facility by the haul trucks
- Uncontrolled fires within the compost or landfill (could trigger grass fires)
- Fuel stored on the site that may be ignited
- Crushed or damaged batteries (particularly lithium-ion type batteries) inappropriately disposed of within the waste stream
- Careless smokers

However, operating procedures and design features at the facility greatly reduce the potential for fire to be started at the site and to spread onto adjacent grasslands. These operating procedures include the application of daily and interim cover at the landfill; implementation of a hazardous waste screening program; implementation of an equipment maintenance program; and implementation of design, safety, training, and reporting measures specified in the facility's hazardous materials management plan. In addition, the potential for onsite fire to spread to adjacent grasslands is reduced by the availability of stored water, stockpiled soil, an engineered fire suppression system in the MRF building, and equipment on the site that can be used to extinguish or contain small fires, as well as the maintenance of firebreaks. For these reasons, the expanded solid waste facilities would not be expected to exacerbate wildfire risk or result in temporary or ongoing impacts to the environment.

Additionally, the proposed project would not expose people or structures to significant risks resulting from downslope or downstream flooding or landslides from runoff, post-fire slope instability, or drainage

changes. As discussed in Chapter 12, Hydrology, the proposed project would implement project-specific SWPPPs that would include BMPs to prevent runoff or flooding that could alter or otherwise affect existing drainage patterns. Therefore, the potential for post-fire instability resulting in downslope runoff and flooding would be low. Therefore, implementation of the project's solid waste elements would have a less-than-significant impact on wildfire risk.

Complementary and Programmatic Elements.

In addition to solid waste elements, complementary and programmatic elements may be developed on the WPWMA's properties. Under the project level, for Plan Concept 1, up to 300,000 square feet of building space plus exterior infrastructure is reserved in the northern part of the western property for the complementary solid waste management elements. Under the programmatic level, for Plan Concept 1, up to 1.9 million square feet of building space has been reserved for these elements primarily within the northern and southern extents of the western property, and on the center property. However, opportunities may arise that would support locating some of these complementary and programmatic elements nearer to the solid waste project elements or within areas not yet developed with solid waste project elements.

Development of the project level of complementary elements would be subject to the CCR Fire Code. The Fire Code contains regulations relating to construction, maintenance, and use of buildings and provides guidance on emergency access, access gates, sprinkler systems, fire alarms within buildings, and construction of access roads to accommodate fire responders. Compliance with these regulations would substantially reduce the potential that the complementary elements would contribute to wildland fire risks. For these reasons, and the fact that the project site is not located within a wildland area that may contain substantial wildfire risks and hazards or a very high-fire-hazard severity zone, the risk of wildfires associated with the complementary elements would be less than significant.

Build out of the programmatic elements also involve compliance with the CCR Fire Code. Development of the additional programmatic elements (1.6 million square feet) would not be located within a wildland area that may contain substantial wildfire risks and hazards or a very high-fire-hazard severity zone, therefore risk of wildfires associated with the programmatic elements would be less than significant.

Plan Concept 2

As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on WPWMA's property and when various facilities would be developed. These differences do not change the conclusions identified for Plan Concept 1. As such, impacts related to wildfire risk as a result of implementation of Plan Concept 2 would be the same as described for Plan Concept 1.

**IMPACT
11-7**

Risk of Vectors. The proposed project operations have the potential to attract vectors, particularly mosquitoes within areas of standing water, which can increase exposure of the public to vector-borne diseases. An increased risk of health hazards from vector-borne diseases would be **significant**.

Plan Concept 1

Sitewide.

At the existing landfill site, vector problems are currently reduced by the covering of waste with daily soil cover or alternative daily cover and regular trash pickup (Golder Associates 2017). After rain where possible, WRSL staff patrol and drain areas that could collect standing water and provide mosquito-breeding areas. All areas that could potentially hold water are inspected weekly for mosquito larvae during rainy periods. Additionally, the site implements a bird control program that involves bird bomb and whistler cartridges to keep birds away from the site. Rodents have not previously been a problem at the landfill site. Measures to reduce vectors at the MRF and compost areas include processing mixed waste within 48 hours, cleaning of the facility on a daily basis, daily sweeping and washing of work areas, daily cleaning of all pits within the MRF, daily monitoring of salvaged material and stockpiled material, and use of a pest control company to control flying insects and rodents.

The proposed project expansion would require the WPWMA to implement a broader vector program that covers the western and eastern properties, in addition to the expanded activities on the central property. The western and eastern properties provide a greater potential for vectors (specifically mosquitoes) to occur due to the presence of aquatic resources that may be disturbed during construction and operation (as discussed in Chapter 3 Biological Resources). The disturbance of these aquatic resources could increase areas of standing water, which would increase breeding areas for mosquitoes. Therefore, the potential exposure of the public to health hazards from vector-borne diseases would be significant.

Complementary and Programmatic Elements.

In addition to solid waste elements, complementary and programmatic elements may be developed on the WPWMA's properties. Under the project level, for Plan Concept 1, up to 300,000 square feet of building plus exterior infrastructure is reserved in the northern part of the western property for the complementary solid waste management elements. Under the programmatic level, for Plan Concept 1, up to 1.9 million square feet has been reserved for these elements primarily within the northern and southern extents of the western property, and on the center property. However, opportunities may arise that would support locating some of these complementary and programmatic elements nearer to the solid waste project elements or within areas not yet developed with solid waste project elements.

Development of the project level of complementary elements and the programmatic elements (additional 1.6 million square feet) would require the WPWMA to implement a broader vector program that covers the western and eastern properties. The western and eastern properties provide a greater potential for vectors (specifically mosquitoes) to occur due to the presence of aquatic resources that may be disturbed during construction and operation. Therefore, development of the complementary and programmatic elements may result in significant impacts.

Plan Concept 2

As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on the WPWMA's property and when various facilities would be developed. These differences do not change the conclusions identified for Plan Concept 1. As such, impacts related to vector hazards as a result of implementation of Plan Concept 2 would be the same as described for Plan Concept 1.

Mitigation Measure 11-7: Risk of Vectors.

During construction, all grading shall be performed by contractors in a manner to prevent the occurrence of standing water or other areas suitable for breeding of mosquitoes and other vectors. The Placer Mosquito and Vector Control District shall be granted access to perform vector control both during construction and operation of the proposed project. This includes ongoing access to all common areas including drainages. As part of the access agreement with Placer Mosquito and Vector Control District, the WPWMA shall require that the district use appropriate vector control methods in biologically sensitive areas to minimize any potential adverse effects to sensitive wildlife and plant species or their habitat.

Level of Significance after Mitigation.

Implementation of Mitigation Measure 11-7 would reduce the proposed project's potential impact from vectors to a **less-than-significant** level.

11.4 References

Anchor Point Wildland Fire Solutions, 2012. Placer County Community Wildfire Protection Plan, December.

California Department of Toxic Substances Control (DTSC). 2020. Envirostor website (<https://www.envirostor.dtsc.ca.gov/public/>). Accessed December 2020.

California Department of Forestry and Fire Protection (CalFire). 2020. CalFire Mission Summary. <https://www.fire.ca.gov/about-us/>. December 14.

ENGE0 2013

Golder Associates. 2017. *Fourth Quarter and Annual 2016 Monitoring Report*

Golder Associates. 2018 *Geotechnical Exploration Report, Proposed Expansion of Western Regional Sanitary Landfill*. August.

Google Earth. 2021. Aerial imagery from selected dates between 1993 and 2021. <https://www.google.com/earth/>.

McClellan Air Force Base (AFB). 1992. *McClellan AFB Comprehensive Land Use Plan*. January.

Nortech. 2020. *Hazardous Materials Business Plan for the WPWMA Materials Recovery Facility*. January.

Placer County 2013. *Placer County General Plan, Countywide General Plan Policy Document*. May 21. Update Approved by Board of Supervisors May 21, 2013.

Placer County Transportation Planning Agency. 2014. *Chapter 6 – Lincoln Regional Airport Policies and Maps*. March 31.

Placer County Department of Emergency Services 2017. *2017 Placer County Emergency Operations Plan*. Draft.

Placer County. 2019. *Sunset Area Plan / Placer Ranch Specific Plan Final Environmental Impact Report*. State Clearinghouse #2016112012. October. Prepared by Ascent Environmental, Sacramento, CA.

Placer County. 2021. *Local Hazard Mitigation Plan Update*. May. Public Review Draft.

Placer County. 2021. Office of Emergency Services. <https://www.placer.ca.gov/1371/About-OES>. Accessed July 23, 2021.

SCS Engineers. 2019. *Engineering Feasibility Study Western Regional Sanitary Landfill Placer County, California*. December 13.

SCS Engineers. 2020. *Second Quarter 2020 Monitoring Report, Western Regional Sanitary Landfill, Placer County, California*. July 31, 2020.

State Water Resources Control Board (SWRCB). 2020. GeoTracker website (<https://geotracker.waterboards.ca.gov/>). Accessed December 2020.