

---

---

## 4.0 ENVIRONMENTAL IMPACT ANALYSIS

### 4.9 HAZARDOUS MATERIALS

---

---

#### ENVIRONMENTAL SETTING

Bradley Landfill is a Class III facility, which accepts for disposal non-hazardous municipal solid wastes and inert solid wastes that require no special handling. The existing landfill currently accepts residential, commercial, and industrial MSW that is generated by Southern California communities ranging from Anaheim and Buena Park in Orange County, Thousand Oaks in Ventura County, and Covina, Azusa, El Monte, Long Beach and cities in between in Los Angeles County, as well as the communities throughout the City of Los Angeles and the eastern San Fernando Valley.

Under its current permits, the landfill may accept up to 10,000 tons of MSW for disposal per day, seven days per week. The landfill is permitted to accept waste Monday through Sunday, 6:00 a.m. to 8:00 p.m. and currently accepts waste Monday through Friday, 6:00 a.m. to 6:00 p.m. and Saturday 7:00 a.m. to 3:00 p.m. The current permits allow this level of operation to occur at BLRC through April 14, 2007. However, expected market demand, coupled with the current rate of waste acceptance, may result in the landfill reaching capacity before that date.

The disposal of regulated hazardous wastes and polychlorinated biphenyls (PCBs) waste is prohibited at Solid Waste (Class III) landfills under Federal, State, and local laws. Permitted wastes include residential, commercial, industrial, and demolition wastes. See Table 4.9-1 and the following discussions for a list of permitted and prohibited wastes. No changes in the permitted waste stream are being sought as part of the Proposed Project.

#### Prohibited Wastes

The approved Solid Waste Facilities Permit (SWFP) and WDR prohibit the following waste streams from being accepted at the Bradley Landfill: liquids, oils, waxes, tars, soaps, solvents, septic tank residues or chemical toilet wastes, slurries, salts, borax, lye, caustic, acids, insecticides, pesticide containers (unless rendered non-hazardous by triple rinsing), poisons, radioactive material, dead animals, non-autoclaved medical/infectious waste, hospital or laboratory wastes, whole vehicular tires, and all hazardous, special and designated wastes. The types of waste currently prohibited for acceptance would not change under the Proposed Project.

**Table 4.9-1  
Permitted and Prohibited Waste at Bradley Landfill**

Permitted Waste	Prohibited Waste
Residential and Commercial Waste: <ul style="list-style-type: none"> <li>• Paper</li> <li>• Rubbish</li> <li>• Ashes</li> <li>• Industrial wastes</li> <li>• Demolition and construction wastes</li> <li>• Vegetable solid and semi-solid wastes</li> <li>• Empty metal containers</li> <li>• Other discarded solid or semi-solid waste</li> </ul> Inert Wastes: <ul style="list-style-type: none"> <li>• Soil</li> <li>• Rock</li> <li>• Gravel</li> <li>• Concrete</li> <li>• Asphalt paving fragments</li> <li>• Glass</li> <li>• Plaster and plasterboard</li> <li>• Inert rubber scrap</li> <li>• Clay and clay products</li> <li>• Inert plastics</li> <li>• Brick</li> <li>• Shredded Tires</li> </ul> Industrial Waste: <ul style="list-style-type: none"> <li>• Treated auto shredder waste</li> <li>• Petroleum Contaminated Soils</li> <li>• Foundry Sand</li> <li>• Treated medical waste</li> </ul>	<ul style="list-style-type: none"> <li>• PCB Waste (usually found in oil in electrical transformers or fluorescent light ballasts)</li> <li>• Untreated medical waste</li> <li>• Liquid waste – sewage sludges, industrial sludges, and slurries</li> <li>• Radioactive materials</li> <li>• Dead animals</li> <li>• White goods – all appliances (can be delivered to recycling Area #9)</li> <li>• Vehicle batteries</li> <li>• Whole tires</li> <li>• 55-Gallon drums or barrels</li> <li>• Asbestos</li> <li>• Anti-freeze</li> <li>• Oils</li> <li>• Tars</li> <li>• Paint</li> <li>• Solvents</li> <li>• Insecticides</li> <li>• Soaps</li> <li>• Salts</li> <li>• Borax</li> <li>• Lye</li> <li>• Caustic</li> <li>• Acids</li> <li>• Poisons</li> <li>• Treated Wood – railroad ties, telephone poles (except as a special waste)</li> <li>• Cathode Ray Tubes (CRT) e.g. TV Screens, computer monitors (these items are accepted for recycling)</li> </ul>
<i>Source: Waste Management Inc., Bradley Landfill and Recycling Center's Report of Disposal Site Information, Appendix P, August 2002.</i>	

A Hazardous Waste Exclusion Program has been prepared for Bradley Landfill (BW/WE) to comply with the operating criteria outlined in federal Subtitle D of the Resources Conservation and Recovery Act of 1976. The facility does not accept hazardous wastes or PCB waste as defined in 40 Code of Federal Regulations (CFR), Part 261, or Title 22 California Code of Regulations (CCR), Chapter 11. Additional unacceptable non-hazardous wastes are also listed in the site permits and are included under this program. A part of the overall hazardous waste program is a site-specific radioactive waste exclusion program, discussed on the following pages.

**Hazardous Waste Identification**

**Prescreening**

Although Class III landfills are only permitted to receive non-hazardous wastes, occasionally some hazardous wastes are found. This usually constitutes attempted illegal disposal or abandonment of hazardous waste on the part of the original generator. The Bradley Landfill has implemented the “Special Waste Program” to detect and prevent the disposal of regulated hazardous wastes and PCB waste at the landfill. This program would continue under the Proposed Project. Operations employees at Bradley Landfill are also trained in special/hazardous waste identification, spill response, accident and injury prevention, and confined space entry awareness.

The Special Waste Program process begins by screening potential customers and determining if a candidate solid waste or contaminated soil meets the definition of special/industrial waste. All special/industrial waste is characterized and submitted on a Western Area – Waste Profile Approval Form (WPAF). The WPAF provides information such as the source of the waste, its physical properties, composition, volume and its chemical components. It is the primary responsibility of the waste generator and the Sales Consultant/District Manager to determine the specific needs concerning the candidate waste stream and to provide the information on the appropriate forms. In completing this form the generator provides information concerning the Resource Conservation and Recovery Act (RCRA) characteristics of the waste and certifies that the waste is not a hazardous or designated waste per RCRA, State or local regulations. The WPAFs (in addition to any State or local forms) are completed and signed by the generator (or designated person) of the candidate wastes. Profile sheets are submitted with supporting analytical data, Material Safety Data Sheets (MSDS), regulatory letters of approval, or any other data that may be appropriate to support a position that the waste is non-hazardous and non-designated. Waste Management, Inc. (WMI) technical and environmental staff review all documentation and compare information to the applicable regulations and company policies. A written decision is then filed for future reference. Customers are required to renew the information on the profile sheets periodically to ensure that the waste stream remains the same. In addition to the above, all soils are tested with a real time monitor at the scalehouse to ensure no volatile organic compounds are present.

**Load Check Program**

Bradley Landfill accepts refuse from the public and private sector. All vehicles disposing refuse at the site are routed and directed to the active area of the landfill by site personnel. A waste load checking program is in place to determine if any unacceptable materials are being brought into the landfill. In general, these procedures require that the site personnel record the driver’s name, vehicle description, license number, and waste source for those undergoing load checks. The program designates a site employee, who has been trained in safety procedures and hazardous waste and PCB waste identification, to randomly inspect vehicles entering the landfill and check their waste loads for unacceptable materials. If a load appears to contain unacceptable material, in addition to the above procedures, access to the materials will be restricted to prevent direct or indirect human contact with them. The wastes will not be disposed of until they have been properly identified. If unacceptable wastes are found, all of the

unacceptable portion of the load will be rejected or if the unacceptable portion of the load cannot be segregated, the entire load will be rejected.

In addition to random load checks, scalehouse spotters classify the waste types in an attempt to identify unacceptable waste before it passes the scales. Spotters and equipment operators monitor the unloading of solid waste from commercial garbage trucks, transfer trucks, refuse hauling trailers and general public vehicles. The staff is trained to identify prohibited waste. If the load contains hazardous waste, or PCB waste, where it cannot be segregated, site personnel will reject the entire load.

### ***Characterization, Storage and Disposal of Retrieved Materials***

Hazardous waste contractor Onyx Environmental Services is responsible for all waste characterization. Any prohibited wastes found on the site that cannot be returned to the original generator are stored in the hazardous waste storage area. To safely store retrieved hazardous waste, the following steps are taken at Bradley Landfill:

1. Segregate the material into chemical groups.
2. Record the information on the WMI Load Checking Inventory Log Sheet:
  - a. Unique record number
  - b. Date received
  - c. Item description
  - d. Container size
  - e. Generator (if known)
3. If necessary, four to six inches of absorbent is placed in the bottom of the container. Secure the lid.
4. Hazardous waste contractor shall label drum and place proper Department of Transportation (DOT) shipping labels on container.
5. All drums are placed in hazardous waste storage area. Enough space between each row of drums shall be maintained to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in emergency.
6. The storage area shall be secured after each visit by locking the gate.
7. Onyx Environmental Services is contracted to visit the site twice a month to consolidate hazardous waste from the temporary storage area to the main hazardous waste storage area. They arrange for lab packing and shipment usually within 45 days after initial accumulation.
8. No waste is stored for longer than 90 days.

9. The hazardous waste storage area is inspected once a week.

### **Radioactive Waste Exclusion Program**

To prevent quantities of radioactive materials from entering the landfill, Bradley Landfill has implemented the radioactive waste exclusion program. Utilizing on-site radiation monitor(s) at the scalehouse(s) satisfies the program's objective. Every vehicle entering the landfill, including loads of soil, has to pass by the radiation monitor installed in the scalehouse. Should the radiation monitor be activated by any vehicle entering the facility, the scales are temporarily closed and a supervisor is called to the scalehouse. Scalehouse personnel then question the driver about the source of the waste while waiting for the supervisor to respond to the call. The radiation monitor is then used to survey any and all vehicles on the scale(s). The vehicle triggering the alarm is directed away from the scalehouse to an isolated location. All WMI employees are directed to stay away from the vehicle until management notifies them that it is safe. Typical landfill operations continue once the vehicle has been removed from the scalehouse and is secured in an isolated area.

Further testing of the suspect vehicle is conducted, and the driver is asked to leave the vehicle for surveillance reasons. A supervisor will then remove the radiation monitor from the scalehouse to perform an additional scan of the vehicle. If the monitor reads above 100 kilocoulomb per meter (kc/m), the scan will stop immediately, if not, the scan will continue. If the readings are less than 100 kc/m, the supervisor will survey the vehicle to determine the location of the source and verify that the vehicle contains a radioactive source.

If the load is "hot," the supervisor notifies the appropriate Environmental Compliance/Health and Safety staff to notify the appropriate regulatory agencies immediately. The agencies to be contacted include the LEA and LA County Radiation Management. The company trying to dispose of the load is also notified immediately of the situation.

If there are no readings above background levels on the vehicle, the supervisor will scan the driver. If the radiation monitor begins to alarm, the driver will be questioned about the possibility that they are taking some type of radioactive medicines. If the drivers state that they are taking medication and the truck has been surveyed and found to be free of radioactivity, they will be permitted to dispose of the load at the landfill.

Any triggering of the radiation monitor is recorded in the Log of Special Occurrences. At that time, the load may be rejected (sent back to the originator) or, as determined by communications with the appropriate regulatory agencies, further steps are taken. WMI follows the directions of the regulatory agencies for final disposal of the load. At no time will the landfill operator take responsibility for the radioactive material. If a representative from the generator does not come out to the landfill the load will be rejected back to the transporter with guidance from the regulatory agencies.

### **Landfill Gas Collection System**

When waste is buried in a landfill, an oxygen-free environment is created under the capping soil layer. In this environment, anaerobic (i.e., without oxygen) microorganisms, particularly bacteria, decompose the organic waste and produce gas as a byproduct. The main gases produced through this biodegradation process include methane and carbon dioxide. Methane is the principal component of natural gas, and may therefore be harnessed and utilized as an energy source. Methane also poses several dangers; for example, it is flammable and may cause explosions and fires if concentrated. As a greenhouse gas, methane is also largely believed to contribute to the process of global warming if released into the atmosphere.

A landfill gas (LFG) collection system is presently installed at BLRC to control both LFG emissions to the atmosphere and the lateral migration of LFG beyond the property boundary and is operated in compliance with Title 27 Sections 20919.5 (Explosive Gas Control) and 20925 (Perimeter Monitoring Network) of the CCRs, among others. Because lateral migration of LFG has the potential to present an explosion hazard due to the methane component, it is discussed in this section. The LFG collection system includes LFG collection wells, piping and blowers to draw the LFG out of the landfill and convey it to the various LFG processing and beneficial use components (Figure 4.9-1). LFG collection wells consist of core wells in the middle of the landfill where gas production is greatest, perimeter wells, and soil vapor extraction wells. The latter two types of wells are primarily for LFG migration control purposes. Most of the active wells have been installed since July 1999. The LFG processing and beneficial use components currently include a gas plant where the LFG is processed and sent via pipeline to an off-site industrial user, five electrical generating plants which generate electricity by burning the LFG, and three LFG combustion flares.

**Figure 4.9-1 Gas Probe Locations**

## **LFG Monitoring**

To ensure the LFG collection system is effective in controlling off-site migration, the existing perimeter gas monitoring system probes are monitored on a monthly basis and the well field is adjusted as needed in compliance with Title 27. The existing LFG monitoring system at the BLRC consists of 40 perimeter monitoring probes around the site. Figure 4.9-1 presents the location of the LFG monitoring probes. The LFG probes monitor for LFG migration at depths ranging from 8 ft (2.4 m) to 165 ft (50 m). These probes are installed at routine horizontal intervals as approved by the LEA and SCAQMD. Fifteen of the LFG monitoring probes are multi-depth probes. Multi-depth probes allow LFG monitoring at discrete depths in the subsurface. Multi-depth probes are constructed to approximately the full depth of refuse. The perimeter monitoring probes are measured for percent methane and LFG pressure. The monitoring results are reported to the LEA on a monthly basis and to the SCAQMD on a quarterly basis.

As an added precaution, Sierra Monitors have also been installed in three of the closest neighboring buildings to provide continuous methane detection monitoring. Letters have accompanied the distribution of these methane detection monitors to property owners and operators. Sierra Monitors are located at the Sun Valley addresses listed below:

1. CAL-PET Crematory, 9595 Glenoaks Blvd.
2. Pacific Precision Metals Straightening Company, 11658 Sheldon St. Unit C
3. Residence located at 9243 Ralston St.

In the event that the off-site migration standard is exceeded, the regulations require the site to take all steps necessary to protect human health per Title 27 of the California Code of Regulations Section 20919.5, Subdivision (c)(1). Any actions deemed necessary (such as periodic hand-held in-structure monitoring or the placement of additional permanent methane detectors in adjacent buildings) are decided on an incident-specific basis, depending on the distance to the nearest structure, the depth of the probe in question, landfill gas extraction variables in the vicinity of the probe, the geology of the area, and other pertinent factors.

On-site structures are also monitored quarterly for combustible LFG concentration. The BLRC recycling office, LFG recovery plant, and the operations and maintenance office trailers are equipped with Sierra Monitors which continuously monitor for methane within the structure and alert personnel of the presence of methane.

## **Regulatory Requirements/Permit Conditions Applicable to the Existing Landfill Operation**

Waste handling techniques at the BLRC are governed by WDR Order No. 94-059, issued by the Regional Water Quality Control Board (RWQCB) on June 13, 1994. Industrial Waste Permits W-471504 and W-450638, issued by the City of Los Angeles Public Works Department on July 1, 1989 and January 1, 1987, respectively, formerly governed the disposal of leachate and condensate. These



permits have been combined into Industrial Waste Permit W-430638, which currently govern the disposal of leachate and condensate. The WDR is a major operating permit which specifies acceptable and unacceptable waste types for disposal, criteria for landfill containment structures, environmental monitoring and reporting requirements. Provisions in the WDR which specifically apply to the handling of hazardous or potentially hazardous materials at the project site are listed in Table 4.9-2, below.

In accordance with Title 27 of the CCRs, Bradley Landfill maintains a log of special occurrences at the facility including discharge of hazardous or other unacceptable wastes.

**Table 4.9-2  
WDR Hazardous Materials Provisions**

<b>Provision Number</b>	<b>Description</b>
A.2	Wastes disposed of at this site shall be limited to non-hazardous solid wastes and inert wastes.
A.3	Non-hazardous solid waste means all putrescible and nonputrescible solid and semi-solid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, vegetable solid and semi-solid wastes and other discarded solid or semi-solid waste; provided that such wastes do not contain wastes which contain soluble pollutants in concentrations which exceed applicable water quality objectives, or could cause degradation of waters of the state (i.e., designated waste).
B.1	No designated or hazardous wastes such as liquids, oils, waxes, tars, soaps, solvents, or readily water soluble solids such as salts, borax, lye, caustic, or acids shall be deposited at this site.
B.2	No materials which are of toxic nature, such as insecticides, poisons, or radioactive materials, shall be deposited at this site.
B.3	No hazardous wastes (or special wastes) shall be disposed of at this site.
B.5	No infectious materials or hospital or laboratory wastes, except those authorized for disposal to land by official agencies charged with control of plant, animal, and human disease, shall be disposed of at this site.
B.6	No pesticide containers shall be disposed of at this site unless they are rendered non-hazardous by triple rinsing.
D.3	The discharger shall remove and relocate to a legal point of disposal any wastes which are discharged at this site in violation of these requirements. The Board shall be informed within 7 days in writing when relocation of wastes is necessary. The source and final disposition (and location) of the wastes shall also be reported.
F.1	The periodic waste-load-checking program shall continue to be implemented to prevent the disposal of hazardous wastes, designated wastes, or other unacceptable wastes. Any updates in this proposal shall be submitted for Executive Officer approval.
F.6	Bradley Landfill shall comply with notification procedures contained in Section 13271 of the California Water Code in regard to the discharge of hazardous substances.
F.19	All State, County, and City sanitary health codes, rules, regulations, and ordinances pertinent to the disposal of wastes on land shall be complied with in the operation and maintenance of this waste disposal site.
<i>Source: California Regional Water Quality Control Board, Waste Discharge Requirements for Waste Management Disposal Services of California, Inc., Bradley Landfill &amp; Recycling Center, Order No. 94-059, File No. 78-27, May 13, 1994.</i>	

## **ENVIRONMENTAL IMPACT**

### **Thresholds of Significance**

In accordance with Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous materials would occur if the Proposed 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 which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- result in a safety hazard for people residing or working in the project area if that area also is located within an airport land use plan or within two miles of a public airport;
- Impact implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;
- Involve a risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals or radiation); or
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands.

## **Project Impacts and Mitigation**

### ***Phase I – Transitional Vertical Expansion***

#### *Bradley West/West Extension*

#### **Impact 4.9-1 The proposed transitional vertical expansion would not change hazardous materials/waste handling procedures. (Less Than Significant)**

Proposed Phase I activities on the Bradley West/West Extension portion of the BLRC would include a transitional 43-foot vertical landfill expansion that would provide additional short-term disposal capacity within the boundaries of the existing landfill. The proposed transitional vertical expansion would occur within approximately 70 acres of the approximately 126-acre landfill refuse footprint located on the Bradley West/West Extension portion of the BLRC. No transitional vertical expansion would occur over the Bradley East portion of the BLRC. The height increase would create an additional 4.7 million cubic yards of disposal capacity and allow the landfill to operate until the currently permitted closure date of April 14, 2007.

Phase I of the Proposed Project would not alter or in any way affect the types of waste currently accepted for disposal at the Bradley Landfill. All non-hazardous wastes, as outlined previously in this section, would continue to be permitted, and all other wastes, including hazardous wastes, would be prohibited for disposal at Bradley Landfill. The Hazardous Waste Load Check Program, Special Waste Program and Radioactive Waste Exclusion Program would continue to be implemented under the Proposed Project as a means of detecting and isolating potentially hazardous wastes. Such programs would continue to ensure that potentially hazardous materials do not enter the landfill, thus ensuring that no hazard is posed to the public or the environment due to transport, use, or disposal of hazardous materials, reasonably foreseeable upset and accident conditions, or risk of accidental explosion or release of hazardous substances as a result of handling solid waste as part of the proposed transitional vertical expansion. Therefore, the potential for the proposed continuation of landfill operations in conjunction with the transitional vertical expansion to result in hazardous impacts would be less than significant.

**Mitigation:** No mitigation measures are required.

#### **Impact 4.9-2 The proposed transitional vertical expansion would increase landfill gas generation. (Less Than Significant)**

The proposed transitional vertical expansion will result in an additional 4.7 million cubic yards of disposal capacity which would have the potential to generate additional LFG. As discussed in Section 4.4, Air Quality, of this EIR, projected LFG recovery rates are expected to rise slightly under the proposed transitional vertical expansion and peak in 2007. The analysis also demonstrates that the peak recovery rate would be within the capacity of the existing LFG collection and control system, not including additional capacity provided by the five on-set electricity generator sets. Therefore, the existing

LFG collection and control system will continue to provide adequate capacity to control migration of LFG and prevent any explosion hazard.

In order to accommodate the proposed transitional vertical expansion, the vertical LFG extraction wells will be extended and the header piping and laterals will be raised up accordingly as the fill is placed and in compliance with Title 27. To ensure the system is effective in controlling migration, the perimeter gas monitoring wells will continue to be monitored on a monthly basis and the wells will be field adjusted as needed. In addition, on-site and off-site continuous in-structure monitoring will continue as needed as an additional element of protection. With the continued operation of the current monitoring and control system mandated by current regulations, there will be no hazard impact from LFG migration due to the Proposed Project.

**Mitigation:** No mitigation measures are required.

**Impact: 4.9-3: Construction of the new TS/MRF would not involve the transport, use or disposal of hazardous materials/waste. (Less Than Significant)**

Construction of the proposed 4,000 tpd TS and the 1,000 tpd MRF adjacent to the existing landfill would include the importation of dirt for the foundation of the new TS/MRF, associated grading activities, installation of paving and curbing, and erection of the pre-engineered metal building for the new TS/MRF. No demolition would be required as part of this phase. Construction activities would not involve the transport, use, or disposal of hazardous materials. Therefore, the potential for the proposed construction of the new TS/MRF to result in hazardous impacts would be less than significant.

**Mitigation:** No mitigation measures are required.

*Bradley East*

**Impact 4.9-4: The increase in existing green and wood waste and MRF operations on Bradley East could increase the potential for hazardous materials to be sent to the site, however, the project applicant will continue utilizing existing procedures to eliminate hazardous materials. (Less Than Significant)**

Green and Wood Waste Processing

The proposed change to the green and wood waste operation would be an increase in the permitted operation to 2,500 tpd, an increase of 1,240 tpd over the existing level of operation. This increase would provide additional capacity to process green and wood waste materials that are currently processed at another facility in the Sun Valley area. Odor and dust control measures would continue to be implemented.

The increase in permitted intake at Bradley East's green and wood waste operation would not alter or in any way affect the types of waste currently accepted at the operation. As only green and wood wastes are accepted, no hazardous materials would enter Bradley East. Additionally, the programs outlined in this

section for the detection of potentially hazardous waste would continue to ensure that hazardous materials do not enter the landfill. Therefore, the potential for the proposed increase in permitted intake at Bradley East's green and wood waste operation to result in hazardous impacts would be less than significant.

#### MRF Expansion

The proposed change to the MRF operation would increase processing of recyclable materials to a maximum of 99 tpd from the existing maximum level of 92 tpd. The proposed sort line and modified MRF operations would operate in the same location as the existing MRF operations, with the same type of equipment. The increase in permitted levels of recyclables processing would not alter or in any way affect the types of waste currently accepted at the operation such that hazardous and potentially hazardous materials are prohibited at the site. The programs outlined in this section for the detection of potentially hazardous waste would continue to ensure that hazardous materials do not enter the landfill. Therefore, the potential for the proposed increase in permitted intake at the MRF to result in hazardous impacts would be less than significant.

**Mitigation:** No mitigation measures are required.

### ***Phase II – Transfer Station/Materials Recycling Facility***

#### *Landfill Closure*

#### **Impact 4.9-5: Landfill closure activities would eliminate MSW from entering the project site for disposal. (Less Than Significant)**

When the existing landfill reaches its maximum capacity or the permits expire on April 14, 2007 (whichever comes sooner), the landfill would be closed and no additional MSW would be accepted for burial. Landfill closure activities would include the import of dirt and inert waste to provide a four-foot soil cap and installation of landscaping features. As no additional MSW would be accepted, no impacts related to hazardous materials in the landfill would occur.

**Mitigation:** No mitigation measures are required.

#### *Transfer Station/MRF Operations*

#### **Impact 4.9-6: Existing procedures would continue to be utilized at the proposed TS/MRF to ensure that hazardous materials are not accepted for processing. (Less Than Significant)**

If the Proposed Project is approved and the landfill approaches a final height of 1,053 feet msl, landfill operations will transition into a TS/MRF operation. MSW would be processed by the proposed TS and would not be deposited into the landfill and covered for an extended period of time. The MSW would instead be received, consolidated and transported to other regional landfills. The procedures currently in place at Bradley Landfill for detecting, removing, and processing unexpected hazardous materials would continue to be operative at the transfer station, thus decreasing the potential for exposure or upset due to hazardous materials. Commercial/residential recyclable materials would be received, sorted, and consolidated at the MRF. From the MRF, these materials would be transported to other regional recycled materials processing facilities. All materials would be adequately screened for potential hazards and handled in accordance with existing procedures. Impacts would be less than significant.

**Mitigation:** No mitigation measures are required.

### **CUMULATIVE IMPACTS**

As stated above, the project site is permitted to only receive and dispose of non-hazardous wastes. In addition, Bradley Landfill conducts programs through which the accidental disposal of potentially hazardous and other prohibited wastes are detected and removed from the waste stream. Development of the Proposed Project would continue to operate under existing conditions and permits for hazardous and non-hazardous wastes. Should any of the related project sites require remediation or contain potentially hazardous materials, it is anticipated that they would be developed in accordance with all applicable environmental laws and regulations. Mitigation or remedial action measures, if necessary, would be implemented on a case-by-case basis, as necessary under the provisions of applicable laws and regulations. Development of the Proposed Project, in conjunction with any of the identified related projects, would therefore not result in cumulatively considerable effects with respect to hazards and hazardous materials.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts associated with hazards and hazardous materials are less than significant.