

5.14 Waste Management

This section evaluates the potential effects on human health and the environment from nonhazardous and hazardous waste generated at the Turlock Irrigation District (TID) Almond 2 Power Plant (A2PP). Section 5.14.1 describes project site investigations and the waste and waste streams that would be generated by the project. Section 5.14.2 presents an environmental analysis of the project in terms of waste and waste disposal sites. Section 5.14.3 discusses potential cumulative effects. Section 5.14.4 describes mitigation measures and waste management methods. Section 5.14.5 presents laws, ordinances, regulations and standards (LORS) that apply to the generated waste. Section 5.14.6 describes agencies that have jurisdiction over the generated waste and agency contacts. Section 5.14.7 describes the permits required for generated waste and a schedule for obtaining those permits, and Section 5.14.8 provides the references used to prepare this section.

5.14.1 Affected Environment

This section discusses the condition of the A2PP site, in terms of the potential need to remove or otherwise treat contaminated soil or groundwater at the site, and discusses the various nonhazardous and hazardous waste streams for A2PP construction and operation.

5.14.1.1 Site Investigations

A Phase I Environmental Site Assessment (ESA) and a Phase II ESA was undertaken at the A2PP site to determine whether contamination that would require removal or remediation is present.

5.14.1.1.1 Phase I Environmental Site Assessment

In February 2009, Wallace-Kuhl & Associates, Inc. (WKA), on behalf of TID, prepared a Phase 1 ESA for the proposed site, north of the existing Almond Power Plant located at 4500 Crows Landing Road in Ceres, Stanislaus County, California. The site consisted of an approximate 3-acre parcel (site)¹ described as Stanislaus County Assessor's Parcel Number 041-060-039, owned by TID (WKA, 2009).

At the time of the ESA, the site was undeveloped and appeared to have been recently leveled, and was essentially featureless (WKA, 2009). The site boundaries were indicated in the field by wooden stakes and a chain link fence separating the site from surrounding parcels.

Surrounding land use consists of industrial development. The site is in a largely industrial area of Ceres. A farm supply facility is north of the site. South of the site is a retention pond and the existing Almond Power Plant. West of the site is the 700,000-square-foot WinCo distribution warehouse. To the east, the site is bounded by railroad tracks and various industrial facilities (modular building distributor and drilling equipment storage laydown areas) (WKA, 2009).

According to WKA, the site was part of a larger portion of land developed for agricultural use by at least the 1950s, which continued until approximately 2004 when WinCo purchased

¹ The Phase 1 ESA addresses the 3-acre parcel to the north of the Almond Power Plant and does not include the 1.6-acre retention pond at the Almond Power Plant which will be filled as part of this project.

the land for its distribution facility (WKA, 2009). The site is currently filled with commercial fill compacted to 95 percent.

Based on WKA's documentation review and site assessment, it appears that none of the neighboring facilities has impacted the site (WKA, 2009). However, it is known that groundwater in the area to the north of the site (beneath Stanislaus Farm Supply) is impacted by nitrates (WKA, 2009).

WKA conducted a preliminary screening for potential vapor intrusion conditions (pVIC) beneath the site using a pVIC-screening matrix and concluded that it is unlikely that a pVIC currently exists beneath the site (WKA, 2009).

The Phase I ESA revealed no evidence of historical or existing recognized environmental conditions (RECs) at the site. It was concluded that no significant data gaps were identified that would affect the identification of RECs (WKA, 2009). However, the following conditions and recommendations regarding the potential for environmental concern at the site were noted:

- If water is to be supplied to the site from a domestic well and/or tied into the domestic well at the existing Almond Power Plant, it is recommended to sample and test the well(s) for nitrates, based on the existing contamination of groundwater beneath neighboring sites.
- It is recommended that the fill material on the site be sampled and tested for persistent pesticide residues, as it is reported that this material originated from an agricultural field and no documentation was provided indicating sampling and testing of the fill material was completed prior to placement.

The Phase I ESA revealed no recognized environmental conditions at the site; however, the two areas of environmental concern discussed above were identified. TID does not intend to develop a domestic water well at the A2PP. The well at the existing Almond Power Plant is a service water well. It is used for firewater, eye-wash stations, and safety showers. Drinking water for the A2PP will be provided by an outside drinking water delivery service. Because the service water well is not used for domestic purposes, TID does not intend to sample and test for nitrates. Further information regarding water supply to the site can be found in Section 5.15, Water Resources.

A copy of the Final Phase I ESA is included in Appendix 5.14A.

5.14.1.1.2 Soil Sampling Results

Based on the findings of the Phase I ESA, soil sampling was conducted on the fill material at the proposed site in April 2009 by WKA, on behalf of TID. Soil samples were collected from six locations from various depths throughout the site, no deeper than the depth of fill material (approximately 6.5 feet bgs). Samples were analyzed for organochlorine pesticides (EPA Method 8081A) and CAM 17 metals (EPA Method 6010). Laboratory analysis identified no organochlorine pesticides detected above laboratory reporting limits in any of the samples collected. Metals were detected, but were below California Human Health Screening Levels (CHHSL), with the exception of arsenic, which slightly exceeds the CHHSL. Per WKA, arsenic is within expected background levels and further evaluation of CAM 17 metals and organochlorines does not appear to be warranted.

A copy of the Final Report of Findings – Soil Sampling and Analysis for the Almond 2 Power Plant is included in Appendix 5.14B.

5.14.1.2 Project Waste Generation

Wastewater, solid nonhazardous waste, and liquid and solid hazardous waste will be generated at the A2PP site during facility construction and operation.

5.14.1.2.1 Construction Phase

During construction, the primary waste generated will be solid nonhazardous waste. However, some nonhazardous liquid waste and hazardous waste (solid and liquid) will also be generated. All of the hazardous wastes will be generated at the plant site. The types of waste and their estimated quantities are described below. Typical wastes generated during construction and demolition are identified in Table 5.14-1.

TABLE 5.14-1
Wastes Generated during Construction

Waste	Origin	Composition	Estimated Quantity	Classification	Disposal
Scrap wood, steel, glass, plastic, paper, calcium silicate insulation, mineral wool insulation	Construction Activities	Normal refuse	100 tons	Nonhazardous	Recycle and/or dispose of in a Class II or III landfill
Scrap Metals	Construction Activities	Parts, containers	20 tons	Nonhazardous	Recycle and/or dispose of in a Class III landfill
Empty hazardous material containers*	Construction Activities	Drums, containers, totes	<1 ton	Hazardous and nonhazardous solids	Containers <5 gallons will be disposed as normal refuse. Containers >5 gallons will be returned to vendors for recycling or reconditioning.
Spent welding materials	Construction Activities	Solid	500 pounds	Hazardous	Disposal at a Class I landfill
Waste oil filters	Construction equipment and vehicles	Solids	500 pounds	Nonhazardous	Recycle at a permitted TSD facility
Used and waste lube oil	CT lube oil flushes	Hydrocarbons	1,500 gallons	Hazardous	Recycle at a permitted TSD facility
Oily rags, oil sorbent excluding lube oil flushes	Cleanup of small spills	Hydrocarbons	100 cubic feet	Hazardous	Recycle or dispose at a permitted TSD facility
Solvents, paint, adhesives	Maintenance	Solids and Liquids	100 gallons	Hazardous	Recycle at a permitted TSD facility
Spent lead acid batteries	Equipment, vehicles	Heavy metals	10	Hazardous	Store no more than 10 batteries (up to 1 year) – recycle offsite

TABLE 5.14-1
Wastes Generated during Construction

Waste	Origin	Composition	Estimated Quantity	Classification	Disposal
Spent alkaline batteries	Equipment	Metals	50 pounds	Universal Waste solids	Recycle or dispose off site at an Universal Waste Destination Facility
Waste oil	Equipment, vehicles	Hydrocarbons	500 gallons	Non-RCRA Hazardous Liquid	Dispose at a permitted TSD facility
Sanitary waste	Portable toilet holding tanks	Solids and Liquids	10,000 gallons	Nonhazardous Liquid	Remove by contracted sanitary service
Stormwater	Rainfall	Water	2,000 gallons/year	Nonhazardous Liquid	Discharge to stormwater retention pond
Fluorescent, mercury vapor lamps	Lighting	Metals and PCBs	20 pounds	Universal Waste solids	Recycle or dispose off site at an Universal Waste Destination Facility
Passivating and chemical cleaning fluid waste	Pipe cleaning and flushing	Liquids	250 gallons	Hazardous or nonhazardous liquid	Sample and characterize/manage appropriately off site
Hydrotest water	Testing equipment and piping integrity	Water	5,000 gallons	Hazardous or nonhazardous liquid	Sample and characterize/manage appropriately off site

*Containers include <5-gallon containers and 55-gallon drums or totes

Notes:

PCBs = polychlorinated biphenyls

RCRA = Resource Conservation and Recovery Act

TSD = treatment, storage, and disposal

Nonhazardous Solid Waste

Listed below are nonhazardous waste streams that could potentially be generated from construction of the generating facility and the electric transmission line.

Paper, Wood, Glass, and Plastics – Approximately 100 tons of paper, wood, glass, and plastics will be generated from packing materials, waste lumber, insulation, and empty nonhazardous chemical containers during project construction. These wastes will be recycled where practical. Waste that cannot be recycled will be disposed of weekly in a Class III landfill. Onsite, the waste will be placed in dumpsters.

Metal – Approximately 20 tons of metal, including steel from welding/cutting operations, packing materials, and empty nonhazardous chemical containers, and aluminum waste from packing materials and electrical wiring will be generated during construction. Waste will be recycled where practical, and nonrecyclable waste will be deposited in a Class III landfill.

Wastewater

Wastewater generated during construction will include sanitary waste, stormwater runoff, equipment washdown water, and water from excavation dewatering during construction (if dewatering is required). Depending on the chemical quality of these wastewaters, they could be classified as hazardous or nonhazardous. As discussed in a later section, wastewater would be sampled and if found hazardous would be disposed of. Methods for disposing of nonhazardous wastewaters are identified in Section 5.14.1.2.2.

Hazardous Waste

Most of the hazardous waste generated during construction will consist of liquid waste, such as water from excavation dewatering (if it contains contaminants), flushing and cleaning fluids, passivating fluid (to prepare pipes for use), and solvents. Some hazardous solid waste, such as welding materials and dried paint, may also be generated during construction.

Flushing and cleaning waste liquid will be generated as pipes are cleaned and flushed. The volume of flushing and cleaning liquid waste generated is estimated to be one to two times the internal volume of the pipes cleaned. The quantity of welding, solvent, and paint waste is expected to be minimal. Wastewater generated during construction could also be considered hazardous, if demonstrated so by sampling. Methods for recycling and disposal of hazardous wastes during construction are described in a Section 5.14.2.3.2.

The construction contractor will be considered the generator of hazardous construction waste and will be responsible for proper handling of hazardous waste in compliance with all applicable federal, state, and local laws and regulations. This responsibility will include licensing, personnel training, accumulation limits and times, and reporting and recordkeeping. The hazardous waste will be collected in satellite accumulation containers near the points of generation. It will be moved daily to the contractor's 90-day hazardous waste storage area located at the site construction laydown area. The waste will be removed from the site by a certified hazardous waste collection company and delivered to an authorized hazardous waste management facility, before expiration of the 90-day storage limit.

5.14.1.2.2 Operation Phase

During A2PP facility operation, the primary waste generated will be nonhazardous solid waste. However, varying quantities of both solid and liquid hazardous waste will also be generated periodically. The types of wastes and their estimated quantities are discussed below.

Nonhazardous Solid Waste

The A2PP will produce facility wastes, typical of power generation facility operations and maintenance activities. These will include rags, turbine air filters, broken and rusted metal and machine parts, defective or broken electrical materials, empty containers, the typical refuse generated by workers and small office operations, and other miscellaneous solid wastes. The quantity of all solid nonhazardous waste generated is estimated to be approximately 40 tons per year. Large metal parts will be recycled.

Nonhazardous Wastewater

The water balance diagram, provided in Figure 2.1-5, illustrates the expected liquid waste streams and flow rates for the A2PP. Sanitary wastewater from sinks, toilets and other sanitary facilities will be located at the Almond Power Plant; no new sanitary wastewater connections will exist at the A2PP. The Almond Power Plant currently discharges sanitary wastewater to an existing onsite septic tank and leachfield.

General facility drainage will consist of area washdown, sample drains, equipment leakage, and drainage from facility equipment areas. Water from these areas will be collected in a system of floor drains, hub drains, sumps, and piping, and will be routed to the adjacent Almond Power Plant's oil/water separator. If needed, water from this sump will be sampled and analyzed at an approved lab. If contamination is present, the water will be trucked off site for disposal at an approved wastewater disposal facility. If sampling results show no contamination, the water will be discharged to the City of Ceres Wastewater Treatment Plant using the existing pipeline currently in place for the Almond Power Plant.

Hazardous Waste

Hazardous waste generated will include waste lubricating oil, used oil filters from turbine equipment, spent catalyst, and chemical cleaning wastes. The catalyst units will contain heavy metals that are considered hazardous. Chemical cleaning wastes, consisting of alkaline and acidic cleaning solutions, will be generated from periodic cleaning of the piping. These wastes may contain high concentrations of heavy metals and will be collected for offsite disposal.

The chemical feed area drains will collect spillage, tank overflows, effluent from maintenance operations, and liquid from area washdowns. Water collected will be sampled and, if it is not contaminated, will be released to the City of Ceres Wastewater Treatment Plant. The quantity of this effluent is expected to be minimal.

Wastes that potentially will be generated during operations at the facility are summarized in Table 5.14-2.

TABLE 5.14-2
Hazardous and Nonhazardous Wastes Generated During Operations

Waste	Origin	Composition	Estimated Quantity	Classification	Disposal
Office waste (paper, wood, glass, plastics, traditional "waste")	Office/ operations	Paper, packing material	4-yard dumpster weekly	Nonhazardous municipal waste	Local municipal trash pickup
Scrap Metal	Operations	Metal	1,000 pounds	Nonhazardous municipal waste	Recycle if possible, or dispose of at local landfill
Lubricating oil	Small leaks and spills from the gas turbine lubricating oil system	Hydrocarbons	200 pounds	Hazardous	Cleaned up using sorbent and rags – disposed of by certified oil recycler

TABLE 5.14-2
Hazardous and Nonhazardous Wastes Generated During Operations

Waste	Origin	Composition	Estimated Quantity	Classification	Disposal
Lubricating oil filters	Gas turbine lubricating oil system	Paper, metal, and hydrocarbons	100 pounds	Hazardous	Recycled by certified oil recycler
Laboratory analysis waste	Water treatment	Sulfuric acid	100 gallons	Hazardous	Sent to waste water tank
Oily rags	Maintenance, wipe down of equipment, etc.	Hydrocarbons, cloth	50 pounds	Hazardous	Recycled by certified oil recycler
Oil sorbents	Cleanup of small spills	Hydrocarbons	50 pounds	Hazardous	Recycled or disposed of by certified oil recycler
Oxidation catalyst units	SCR system emissions control systems (use tends to be 3 to 5 years)	Metal and heavy metals, including vanadium	9,500 pounds	Hazardous	Recycled by SCR manufacturer
SCR catalyst units	SCR system (use tends to be 3 to 5 years)	Metal and heavy metals, including vanadium	40,645 pounds	Hazardous	Recycled by SCR manufacturer or disposed of in Class I landfill

*Generally, nonhazardous will be sampled prior to disposal.

CO = carbon monoxide

HRSG = heat recovery steam generator

SCR = selective catalytic reduction

5.14.2 Environmental Analysis

5.14.2.1 Significance Criteria

According to California Environmental Quality Act Guidelines Section 15002(g), Appendix G, the project could have a significant effect on the environment in terms of waste management if it would do the following:

- Be located on a site which is included on a list of hazardous materials sites (Cortese List) compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment
- Have solid waste disposal needs beyond the capacity of appropriate landfills to accommodate them

The risks or hazards posed by the transportation of hazardous materials, including hazardous wastes, are described and analyzed in Section 5.5, Hazardous Materials Handling.

5.14.2.2 Cortese List

An examination of the California Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List (Cortese List) shows zero of the 38 sites currently on the list for Stanislaus County are located within the city limits of Ceres (DTSC, 2009a). These sites are compiled pursuant to Government Code Section 65962.5.

Of the sites nearest to the A2PP, the Martinez Property site located 1627 Nadine Avenue, Modesto, California, 95351 is the closest, approximately 4.5 miles north-northeast of the A2PP site. The Martinez Property site is a residential site that was certified on July 1, 1983 and listed as a State Response Site. Site screening was performed on December 30, 1987 and 40 cubic yards of brick and soil contaminated with chromium VI were removed. This removal completed the clean up and was the last recorded action on the site.

The A2PP site is not located on a Cortese-listed property and is not affected by the Martinez Property due to the distance between the two sites.

5.14.2.3 Solid Waste Disposal

Nonhazardous solid waste (often referred to as solid waste, municipal solid waste, or garbage) will be recycled or deposited in a Class III landfill. Hazardous wastes, both solid and liquid, will be delivered to a permitted offsite TSD facility for treatment or recycling, or will be deposited in a permitted Class I landfill. The following sections describe the waste disposal sites feasible for disposal of A2PP wastes.

5.14.2.3.1 Nonhazardous Waste

Approximately 120 tons of solid nonhazardous waste will be generated during construction of the A2PP, and solid waste will continue to be generated during operation of the project. Other solid wastes will be recycled to the extent possible, and what cannot be recycled will be disposed of at a permitted landfill.

It is anticipated that all excavated soil will be used onsite for grading and leveling purposes. In the event that some of the excavated soil will not be reused onsite, classification of the soil for disposal would be made on the basis of sampling completed once the soil is excavated and stockpiled. Soil that is determined to be nonhazardous on the basis of the sampling conducted could be suitable for reuse at a construction site or disposal at a regional disposal facility, depending on the chemical quality.

The Stanislaus County Environmental Resources Department owns and operates the county-owned Fink Road Landfill, located at 4000 Fink Road, Crows Landing, California, 95313. The Fink Road Landfill is a Class II and III landfill that provides services for municipal and industrial solid waste disposal for Stanislaus County. The landfill is approximately 18.5 miles (south-southwest) of the A2PP site, and encompasses 164 acres. Fink Road accepts the following waste types: agricultural; ash; construction/demolition; industrial; mixed municipal; sludge (biosolids); and tires (CIWMB, 2009a).

The primary disposal facility is the Fink Road Landfill. The Fink Road Landfill has adequate capacity to handle and dispose of solid waste generated by the A2PP facility, as shown in Table 5.14-3. The other landfill and transfer stations included in this table, Bonzi Sanitary Landfill, Gilton Resource Recovery Facility and Transfer Station, and Bertolotti Disposal and Transfer Station, are alternatives that may be used to handle the A2PP's solid waste and

recycling. The landfills at Fink Road and Bonzi Sanitary are the only active permitted landfills in Stanislaus County.

According to the California Integrated Waste Management Board (CIWMB), the Fink Road Landfill has a maximum permitted capacity of 14.5 million cubic yards of refuse and the estimated remaining capacity as of January 05, 2007 was 10 million cubic yards. According to the CIWMB, there were no violations or enforcements actions against the Fink Road Landfill in the last 12 months. Areas of concern were noted for gas monitoring and control as well as equipment issues (CIWMB, 2009a).

TABLE 5.14-3
Solid Waste Disposal Facilities in the Vicinity of the A2PP Project

Landfill/MRF/ Transfer Station	Location	Class	Permitted Capacity* (Cubic Yards)	Remaining Capacity* (Cubic Yards)	Permitted Throughput* (Tons per Day)	Estimated Closure Date*	Violation of Minimum State Standards Noted*
Fink Road Landfill	Crows Landing, CA	II, III	14,500,000	10,000,000	2,400	12/01/2023	No (only Areas of Concern listed)
Bonzi Sanitary Landfill	Modesto, CA	III	4,171,000	291,124	200	12/31/2019	Yes (5/08, 6/08, 7/08, 8/08, 10/08, 11/08)
Gilton Resource Recovery Facility and Transfer Station	Modesto, CA	Not Listed	Not Listed	Not Listed	1,200	Not Listed	No (only Areas of Concern listed)
Bertolotti Disposal and Transfer Station	Modesto, CA	Not Listed	Not Listed	Not Listed	750	Not Listed	Yes (4/08, 5/08, 8/08, 10/08)

*Based on CIWMB Solid Waste Information System Database (CIWMB, 2009a).

The Bonzi Sanitary Landfill is located at 2650 West Hatch Road, Modesto, California 95358. The facility encompasses 128 acres. It is located approximately 5 miles north-northwest of the A2PP site. The Bonzi Sanitary Landfill accepts construction/demolition and industrial waste (CIWMB, 2009a). As of May 01, 2005, the Bonzi Sanitary Landfill had an estimated remaining capacity of less than 300 thousand cubic yards (CIWMB, 2009a).

The Gilton Resource Recovery Facility and Transfer Station, located at 800 South McClure Road in Modesto, encompasses 11 acres. The facility is approximately 7.5 miles north-northeast of the A2PP site. As a large volume transfer and processing facility, the Gilton Transfer Station is permitted to receive 1,200 tons per day, including agricultural, construction/demolition, industrial, mixed municipal, tires, and wood waste (CIWMB, 2009a).

The Bertolotti Disposal and Transfer Station is located at 231 Flamingo Drive, in Modesto, approximately 2 miles north of the A2PP site. It is a large volume transfer and processing facility, accepting mixed municipal, wood waste, industrial, construction/demolition, tires, and agricultural wastes. The Bertolotti Disposal and Transfer Station encompasses 5 acres and is permitted to receive 750 tons per day (CIWMB, 2009a).

Adequate landfill capacity exists; therefore, disposal of solid nonhazardous waste will not be a constraint on A2PP development.

5.14.2.3.2 Hazardous Waste

Hazardous waste generated at the A2PP facility will be stored at the facility for less than 90 days. The waste will then be transported to a TSD facility by a permitted hazardous waste transporter. These facilities vary considerably in what they can do with the hazardous waste they receive. Some can only store waste, some can treat and stabilize the waste to recover usable products, and others can dispose of the waste by incineration, deep-well injection, or landfilling. However, incineration and deep-well injection of these materials are not permitted in California.

According to DTSC, there are 61 facilities in California that can accept hazardous waste for treatment and recycling (DTSC, 2009b). For ultimate disposal, California has the three hazardous waste (Class I) landfills (described below). The closest commercial hazardous waste disposal facility is the Waste Management Kettleman Hills Landfill.

Waste Management Kettleman Hills Landfill

This facility accepts Class I, II, and III waste. Kettleman Hills operates both hazardous and nonhazardous waste landfills at their facility. Currently the hazardous waste landfill, identified as B-18 Landfill, is permitted for and will accept all hazardous wastes except radioactive, medical, and unexploded ordnance. This landfill has permitted capacity of 10.7 million cubic yards with a remaining capacity of slightly less than 1 million cubic yards as of August 2008 (Turek, 2008). The life expectancy remaining for Landfill B-18 is currently until 2010; however, expansion of the facility is in progress and will add 4.9 million cubic yards to the landfill. Expansion of the facility would change the closure date to 2020 (Turek, 2008). Kettleman Hills has a current daily throughput of 1,650 cubic yards and an approximated yearly throughput of 450,000 cubic yards (CIWMB, 2009a).

Clean Harbors Buttonwillow Landfill

This Class I landfill is permitted at 14.3 million cubic yards (CIWMB, 2009a and Buoni, 2007) and has approximately 10 million cubic yards of remaining capacity as of August 2008 (Atkinson, 2008). At the current deposit rate, the landfill is permitted to accept waste until 2040 (CIWMB, 2009a). Buttonwillow has been permitted to accept all hazardous wastes except flammables, polychlorinated biphenyls (PCBs) with a concentration greater than 50 parts per million, medical waste, explosives, and radioactive waste with radioactivity greater than 1,800 picocuries (Buoni, 2007). The landfill is permitted for 352,000 cubic yards of hazardous waste annually. They actually accept approximately 300,000 cubic yards of hazardous waste per year, which breaks down to approximately 1,000 cubic yards of hazardous waste per day (Atkinson, 2008).

Clean Harbors Westmoreland Landfill

This facility is not currently open and accepting waste because the Buttonwillow facility can accommodate the current hazardous waste generation rate. The facility is, however, available in reserve and could be reopened if necessary. The landfill's conditional use permit prohibits the acceptance of some types of waste, including radioactive (except geothermal) waste, flammables, medical waste, PCB, dioxins, air- and water-reactive wastes, and strong oxidizers.

Additional Facilities

In addition to hazardous waste landfills, there are numerous offsite commercial liquid hazardous waste treatment and recycling facilities in California. Some of the closest facilities include Clean Harbors, LLC in San Jose; Evergreen Environmental Services in Davis; Evergreen Oil Company in Newark; Ramos Environmental Services in West Sacramento; and Veoliaes (Onyx) Environmental Services in Richmond (DTSC, 2009b).

5.14.2.4 Waste Disposal Summary

The A2PP facility will generate nonhazardous solid waste that will add to the total waste generated in Stanislaus County and in California. However, there is adequate recycling and landfill capacity in California to recycle and dispose of the waste generated by the A2PP (CIWMB, 2009b). It is estimated that the A2PP will generate approximately 120 tons of solid waste during construction (including approximately 1.4 tons of solid hazardous waste) and about 40 tons a year from operations (including approximately 1 ton of solid hazardous waste). An additional approximately 25 tons of catalyst units will be recycled by the manufacturer during operation. Considering that 229,189 tons of solid waste were landfilled in Stanislaus County in the year 2007, and 196,538 tons through the third quarter of 2008 (fourth quarter and 2008 total values not yet published), the A2PP's contribution will represent a fraction of the county's total waste generation (CIWMB, 2009b). Therefore, the impact of the project on solid waste recycling and disposal capacity will not be significant.

Hazardous waste generated will consist of waste oil, filters, SCR and oxidation catalysts, and fluids used to clean piping. The waste oil and catalysts will be recycled. Hazardous waste treatment and disposal capacity in California is more than adequate. Therefore, the effect of the A2PP on hazardous waste recycling, treatment, and disposal capability will not be significant.

5.14.3 Cumulative Effects

A cumulative impact refers to a proposed project's incremental effect together with other closely related past, present, and reasonably foreseeable future projects whose impacts may compound or increase the incremental effect of the proposed project (Public Resources Code Section 21083; California Code of Regulations, Title 14, Section 15064(h), 15065(c), 15130, and 15355).

For 2008-2009, the City of Ceres has 19 public works projects, five commercial/industrial projects, 10 city-related plans or programs either planned or currently under way. Of these projects, three are within a 1-mile radius of the project site and/or transmission routes, and include:

- **Crows Landing (Flea Market) and Ceres Lions Park Wells** – Addition of a 650 to 725 gallon per minute (gpm) well at the Crows Landing Flea Market and second 650 gpm well at Ceres Lions Park. Design of the pumps is under way.
- **Lagoon Cleaning Project** – As part of the City’s effort to improve the treatment system, percolation ponds east of Morgan Avenue and south of E. Service Road are being dredged, with completion expected in early 2009.
- **Larger Stand-by Power at Blaker Reservoir** – The City plans to either replace the existing stand-by power unit currently capable of powering two of the six booster pumps, with a power unit capable of running four booster pumps, or add a second unit to power the two additional pumps. This project is currently in the planning phase.

In addition to these capital projects, the City has an additional 30 project applications approved and five pending within the Planning Department. Of the 30 approved projects, three are industrial and are within the Service Road Industrial Master Plan area, two are residential within the Brown Annexation Master Plan area, and the last is residential within the Westpoint Master Plan area; these projects are within approximately one mile of the project site. The pending applications include one residential project (34 units) and three commercial projects (a total of 410,000 square feet). These projects range between 2.5 to 3 miles away from the A2PP.

In December 2008, 29 projects applications were under review within the Stanislaus County Planning Division including general plan amendments and re-zonings, and applications to develop residential, office, commercial, and industrial uses as well as religious, educational, and health institutions; agricultural-related uses; and natural resource extraction (Stanislaus County, 2008; 2009). These projects were located elsewhere in the county in the areas of Salida, Waterford, Oakdale, Patterson, Keyes, Knights Ferry, Denaire, Turlock, Empire, Hughson, Newman, and Modesto.

Because the A2PP will not result in significant adverse impacts that cannot be mitigated, impacts from the A2PP will not combine with those from the projects being processed in the city limits to result in cumulative significant impacts. The quantities of nonhazardous and hazardous wastes that would be generated during construction and operation of the A2PP, furthermore, would be relatively low, at an estimated 120 tons of solid waste during construction and approximately 40 tons per year during operation. Recycling efforts will be prioritized wherever practical, and capacity is available in a variety of treatment and disposal facilities. There is currently sufficient landfill capacity available in the project area (CIWMB, 2009b). Therefore, these added waste quantities generated by the A2PP would not result in significant cumulative waste management impacts.

5.14.4 Mitigation Measures and Waste Management Methods

The handling and management of waste generated by the A2PP will follow the hierarchical approach of source reduction, recycling, treatment, and disposal. The first priority will be to reduce the quantity of waste generated through pollution prevention methods (for example, high-efficiency cleaning methods). The next level of waste management will involve reusing or recycling wastes (for example, used oil recycling). For wastes that cannot be recycled, treatment will be used, if possible, to make the waste nonhazardous (for

example, neutralization). Finally, offsite disposal will be used to dispose of residual wastes that cannot be reused, recycled, or treated.

The following sections present methods for managing both nonhazardous and hazardous waste generated by the A2PP.

5.14.4.1 Construction Phase

Handling requirements and mitigation measures for the handling of wastes during construction are described in the following sections.

5.14.4.1.1 Nonhazardous Wastes

Nonhazardous solid waste generated during construction will be collected in onsite dumpsters and picked up periodically for disposal at the Fink Road Landfill or another local landfill. Recyclable materials will be segregated and transported by construction contractors or other private haulers to an area recycling facility. Drop boxes or debris boxes for large quantities of recyclables may be provided.

Wastewater generated during construction will include sanitary waste and could include excavation dewatering water, equipment washwater, and stormwater runoff. Sanitary waste will be collected in portable, self-contained toilets. Excavation dewatering water will be contained in portable tanks and sampled prior to offsite disposal. Equipment washwater will be contained at designated wash areas and will be disposed of offsite. Stormwater runoff will be managed in accordance with a stormwater management permit, which will be obtained prior to the start of construction. The generation of nonhazardous wastewater will be minimized through water conservation and reuse measures.

5.14.4.1.2 Hazardous Wastes

Most of the hazardous waste generated during construction will consist of liquid waste, such as excavation dewatering water (if encountered and contaminated), flushing and cleaning fluids, passivating fluids, and solvents. Some solid waste, in the form of welding materials and dried paint, may also be generated. Nonhazardous materials will be used whenever possible to minimize the quantity of hazardous waste generated. The construction contractor will be the generator of hazardous construction waste and will be responsible for proper handling in compliance with all applicable federal, state, and local laws and regulations, including licensing, training of personnel, accumulation limits and times, and reporting and recordkeeping. The hazardous waste will be collected in satellite accumulation containers near the points of generation. This waste will be moved daily to the contractor's 90-day hazardous waste storage area, located at the plant construction laydown area. The waste will be delivered to an authorized hazardous waste management facility, before expiration of the 90-day storage limit.

5.14.4.2 Operation Phase

Handling requirements and mitigation measures for the handling of wastes during operation are described in the following sections.

5.14.4.2.1 Nonhazardous Wastes

Nonhazardous solid waste or refuse will be collected and deposited in a local landfill. Whenever practical, recycling will be implemented throughout the facility to minimize the quantity of nonhazardous waste that must be disposed of in a landfill.

5.14.4.2.2 Hazardous Wastes

To avoid the potential effects on human health and the environment from handling and disposing of hazardous wastes, procedures will be developed to ensure proper labeling, storage, packaging, recordkeeping, and disposal of all hazardous wastes. The following general procedures will be employed:

- The A2PP will be classified as a hazardous waste generator and will obtain a site-specific Environmental Protection Agency identification number that will be used to manifest hazardous waste from the A2PP facility. Hazardous waste from the A2PP facility will be stored on site for less than 90 days before offsite disposal, treatment, or recycling.
- Hazardous wastes will be accumulated at the generating facility according to the California Code of Regulations Title 22 requirements for satellite accumulation.
- Hazardous wastes will be stored in appropriately segregated storage areas surrounded by berms to contain leaks and spills. The bermed areas will be sized to hold the full contents of the largest single container and, if not roofed, sized for an additional 20 percent to allow for rainfall. These areas will be inspected daily.
- Hazardous wastes will be collected by a licensed hazardous waste hauler, using a hazardous waste manifest. Wastes will only be shipped to authorized hazardous waste management facilities. Biannual hazardous waste generator reports will be prepared and submitted to the DTSC. Copies of manifests, reports, waste analyses, and other documents will be kept onsite and will remain accessible for inspection for at least 3 years.
- Employees will be trained in hazardous waste procedures, spill contingencies, and waste minimization.
- Procedures will be developed to reduce the quantity of hazardous waste generated. Nonhazardous materials will be used instead of hazardous materials whenever practical, and wastes will be recycled whenever practical.

Specifically, hazardous waste handling will include the following practices. Handling of hazardous wastes in this way will minimize the quantity of waste deposited to landfills.

- Waste lubricating oil will be recovered and recycled by a waste oil recycling contractor.
- Spent oil filters and oily rags will be recycled.
- Spent SCR and oxidation catalysts will be recycled by the supplier, if possible, or disposed of in a Class I landfill.

5.14.4.3 Facility Closure

When the A2PP is closed, both nonhazardous and hazardous wastes must be handled properly. Closure can be temporary or permanent. Temporary closure would be for a period of time greater than the time required for normal maintenance, including overhaul or replacement of the combustion turbines. Causes for temporary closure could be a disruption in the supply of natural gas, flooding of the site, or damage to the plant from earthquake, fire, storm, or other natural causes. Permanent closure would consist of a cessation in operations with no intent to restart operations and could result from the age of the plant, damage to the plant beyond repair, economic conditions, or other unforeseen reasons. Handling of wastes for these two types of closure are discussed below.

5.14.4.3.1 Temporary Closure

For a temporary closure, where there is no release of hazardous materials, facility security will be deployed on a 24-hour basis, and the California Energy Commission will be notified. Depending on the length of shutdown necessary, a contingency plan for the temporary cessation of operations will be implemented. This plan will be prepared as described in the plant closure section. The plan will be developed to ensure conformance with all applicable LORS and the protection of public health and safety and the environment. The plan, depending on the expected duration of the shutdown, could include draining all chemicals from storage tanks and other equipment and the safe shutdown of all equipment. All wastes will be disposed of according to applicable LORS, as discussed in Section 5.14.5.

Where the temporary closure is in response to facility damage, or where there is a release or threatened release of hazardous waste or materials into the environment, procedures will be followed as set forth in a risk management plan. Procedures include methods to control releases, notification of applicable authorities and the public, emergency response, and training for generating facility personnel in responding to and controlling releases of hazardous materials and hazardous waste. Once the immediate problem of hazardous waste and materials release is contained and cleaned up, temporary closure will proceed as described for a closure where there is no release of hazardous materials or waste.

5.14.4.3.2 Permanent Closure

The planned life of the generation facility is 30 years, although operation could be longer. When the facility is permanently closed, the handling of nonhazardous and hazardous waste and hazardous materials will be part of a general closure plan that will attempt to maximize the recycling of facility components. Unused chemicals will be sold back to the suppliers or other purchasers or users. All equipment containing chemicals will be drained and shut down to protect public health and safety and the environment. All nonhazardous wastes will be collected and disposed of in appropriate landfills or waste-collection facilities. All hazardous wastes will be disposed of according to applicable LORS. The site will be secured 24 hours per day during the A2PP decommissioning activities.

5.14.4.3.3 Monitoring

Because the environmental impacts caused by construction and operation of the facility are expected to be minimal, extensive monitoring programs will not be required. Generated waste, both nonhazardous and hazardous, will be monitored during project construction and operation in accordance with the monitoring and reporting requirements mandated by the regulatory permits to be obtained for construction and operation.

5.14.5 Laws, Ordinances, Regulations, and Standards

Nonhazardous and hazardous waste handling at A2PP will be governed by federal, state, and local laws. Applicable laws and regulations address proper waste handling, storage, and disposal practices to protect the environment from contamination and to protect facility workers and the surrounding community from exposure to nonhazardous and hazardous waste. Table 5.14-4 presents a summary of the LORS applicable to waste handling at the A2PP facility.

TABLE 5.14-4
Laws, Ordinances, Regulations, and Standards for Waste Management

LORS	Requirements/Applicability	Administering Agency	AFC Section Explaining Conformance
Federal			
RCRA Subtitle D	Regulates design and operation of solid waste landfills. A2PP solid waste will be collected and disposed of by a collection company in conformance with Subtitle D.	CIWMB	Sections 5.14.5.1, 5.14.4.1, 5.14.4.2.1, 5.14.1.2.2
RCRA Subtitle C	Controls storage, treatment, and disposal of hazardous waste. Hazardous waste will be handled by contractors in conformance with Subtitle C.	DTSC	Sections 5.14.5.1, 5.14.4.1.2, 5.14.4.2.2, 5.14.1.2.2
Clean Water Act (CWA)	Controls discharge of wastewater to the surface waters of the U.S. Process wastewater will be discharged to the City of Ceres Wastewater Treatment Plant.	Regional Water Quality Control Board	Sections 5.14.5.1, 5.14.4.1.1, 5.14.4.2.1
State			
California Integrated Waste Management Act (CIWMA)	Controls solid waste collectors, recyclers, and depositors. A2PP solid waste will be collected and disposed of by a collection company in conformance with the CIWMA.	CIWMB	Sections 5.14.5.2, 5.14.4.1, 5.14.4.2.1, 5.14.1.2.2
Hazardous Waste Control Law (HWCL)	Controls storage, treatment, and disposal of hazardous waste. Hazardous waste will be handled by contractors in conformance with the HWCL.	DTSC	Sections 5.14.5.2, 5.14.4.1.2, 5.14.4.2.2, 5.14.1.2.2
Porter-Cologne Water Quality Control Act	Controls discharge of wastewater to surface waters and groundwaters of California. Industrial process water will be discharged to the City of Ceres Wastewater Treatment Plant.	RWQCB	Sections 5.14.5.2, 5.14.4.1.1, 5.14.4.2.1
California Fire Code	Controls storage of hazardous materials and wastes and the use and storage of flammable/combustible liquids. Wastes will be accumulated and stored in accordance with Fire Code requirements. Permits for storage containers will be obtained, as needed, from the Ceres Emergency Services – Fire Division.	Ceres Emergency Services – Fire Division	Section 5.14.7, 5.14.5.4, 5.14.4.2.2
Local			
Certified Unified Program Agency (CUPA) Program (Health and Safety Code Section 25180)	To consolidate, coordinate and make consistent the administrative requirements, permitting, inspection activities, enforcement activities and fees for hazardous waste and hazardous materials programs in each jurisdiction.	Stanislaus County Environmental Resources Hazardous Materials Division	Sections 5.14.7, 5.14.5.3, 5.14.4.2.2

TABLE 5.14-4
Laws, Ordinances, Regulations, and Standards for Waste Management

LORS	Requirements/Applicability	Administering Agency	AFC Section Explaining Conformance
Hazardous Waste Generator Program (Health and Safety Code Section 25200 et seq.; California Code of Regulations Title 22, Section 66001 et seq.)	To protect public health and the environment from exposure to hazardous wastes by regulation of the businesses and industries that generate hazardous waste through a comprehensive program of inspection, chemical emergency response, surveillance, complaint investigation, and assistance to industry, enforcement and public education.	Stanislaus County Environmental Resources Hazardous Materials Division	Sections 5.14.7, 5.14.5.3, 5.14.4.2.2
California Public Resources Code Section 43101	To protect the public health and the environment from the effects of improper storage, collection, transportation and disposal of solid waste. CIWMB is the Local Enforcement Agency (LEA) for enforcement of solid waste laws and regulations within Stanislaus County. Waste will be recycled in a manner consistent with applicable LORS.	CIWMB	Section 5.14.6, 5.14.5.3, 5.14.4.1.2
Hazardous Waste Tiered Permitting Program (Health and Safety Code Sections 25200.3, 25201.5; California Code of Regulations Title 22, Section 67450.2 et seq.)	To ensure that hazardous wastes treated on site prior to reuse or disposal are stored, handled and disposed of in compliance with state and federal laws and regulations. Inspection, surveillance and permitting is required as part of the county Unified Program.	Stanislaus County Environmental Resources Hazardous Materials Division	Sections 5.14.7, 5.14.5.3, 5.14.4.2.2
Environmental Health Emergency Response Program (California Health and Safety Code Sections 25200 et seq. and 101040)	Interagency emergency response team guidelines for incidents involving hazardous material spills or releases, including health assessments to evaluate actual or potential environmental contamination and/or human exposure, recommendations for short and long-term cleanup, and oversight of the cleanup activities performed by the responsible parties or environmental assessment firms.	Stanislaus County Environmental Resources Hazardous Materials Division	Sections 5.14.7, 5.14.5.3, 5.14.4.2.2
Stanislaus County Environmental Resources Hazardous Materials Division various programs	Stanislaus County Environmental Resources Hazardous Materials Division is the CUPA for Stanislaus County that regulates and conducts inspections of businesses that handle hazardous materials, hazardous wastes, and/or have aboveground or underground storage tanks. A2PP will comply with Stanislaus County Environmental Resources Hazardous Materials Division requirements concerning storage and handling of hazardous materials and wastes and will also cooperate with Stanislaus County Environmental Resources Hazardous Materials Division on resolution of any environmental issues at the site.	Stanislaus County Environmental Resources Hazardous Materials Division	Section 5.14.6, 5.14.7, 5.14.5.3, 5.14.4.2.2

5.14.5.1 Federal LORS

EPA regulates wastewater under the CWA. The federal statute that controls both nonhazardous and hazardous waste is the RCRA 42 USC 6901, et seq. RCRA's implementing regulations are found at 40 CFR 260, et seq. Subtitle D assigns responsibility for the regulation of nonhazardous waste to the states; federal involvement is limited to establishing minimum criteria that prescribe the best practicable controls and monitoring requirements for solid waste disposal facilities. Subtitle C controls the generation, transportation, treatment, storage, and disposal of hazardous waste through a comprehensive "cradle-to-grave" system of hazardous waste management techniques and requirements. It applies to all states and to all hazardous waste generators (above certain levels of waste produced). The A2PP will conform to this law in its generation, storage, transport, and disposal of any hazardous waste generated at the facility. EPA has delegated its authority for implementing the law to the State of California.

5.14.5.2 State LORS

Wastewater is regulated by the State and Regional Water Quality Control Boards under the Porter-Cologne Water Quality Control Act. Nonhazardous solid waste is regulated by the CIWMA of 1989, found in Public Resources Code Section 40000, et seq. This law provides an integrated statewide system of solid waste management by coordinating state and local efforts in source reduction, recycling, and land disposal safety. Counties are required to submit Integrated Waste Management Plans to the state. This law directly affects Stanislaus County and the solid waste hauler and disposer that will collect A2PP solid waste.

RCRA allows states to develop their own programs to regulate hazardous waste. The programs must be at least as stringent as RCRA. California has developed its own program in the California HWCL (Health and Safety Code Section 25100, et seq.). Because California has elected to develop its own program, the HWCL performs essentially the same regulatory functions as RCRA and is the law that will regulate hazardous waste at the A2PP. However, the HWCL includes hazardous wastes that are not classified as hazardous waste under RCRA. Because hazardous wastes will be generated at the A2PP facility during construction and operation, the HWCL will require the A2PP to adhere to storage, recordkeeping, reporting, and training requirements for these wastes.

5.14.5.3 Local LORS

CIWMB is the local enforcement agency (LEA) for solid waste facilities within the Stanislaus County (CIWMB, 2009c). The CIWMB Enforcement Agency will be responsible for administering and enforcing the CIWMA for solid, nonhazardous waste for the A2PP. The purpose of this program is to protect the public health and the environment from the effects of improper storage, collection, transportation, and disposal of solid waste. Activities include monthly inspections of landfill sites and transfer stations. Annual inspections are performed on refuse vehicles, cannery waste disposal, animal feeding, and other permitted solid waste sites.

The Stanislaus County Environmental Resources Hazardous Materials Division was approved by the State as the CUPA for Stanislaus County. The Stanislaus County Environmental Resources Hazardous Materials Division is responsible for administering HMBPs, RMPs, PSMPs, and SPCC Plans filed by businesses located in the county. They also

administer the above and below ground storage tank programs, as well as the hazardous waste generator programs (Beniamine, 2009). Through these programs, the Stanislaus County Environmental Resources Hazardous Materials Division ensures that businesses and industry store and use hazardous materials safely and in conformance with various regulatory codes. To enforce these programs, the Stanislaus County Environmental Resources Hazardous Materials Division handles permits and performs inspections at established facilities to verify that hazardous materials are properly stored and handled and that the types and quantities of materials reported are accurate (Beniamine, 2009). The Stanislaus County Environmental Resources Hazardous Materials Division also oversees site investigation for soil and ground water contamination and clean-up.

Stanislaus County manages waste generation, recycling, and disposal programs through their Environmental Resources Solid Waste Management and Landfill Divisions, as well as Public Works Department. The County contracts and provides local service for residential, commercial, and industrial solid waste hauling, as well as the collection of recyclable materials. In this regard, the county provides assistance to businesses in achieving their overall goal of maximizing recycling and minimizing waste that gets landfilled.

In the event of a chemical emergency, plant personnel will defer to the Stanislaus County Environmental Resources Hazardous Materials Division and the Ceres Emergency Services - Fire Division. Ceres Fire Division Station No. 3 would be the first on site, and can request additional resources from the other Ceres Fire Division stations, the City of Modesto Fire Department, and the Westport Fire Protection District. As Westport is a volunteer fire department, the City of Modesto Fire Department would provide the primary source of mutual aid.

For emergency spills and hazardous materials, the Ceres Fire Division and the City of Modesto Fire Departments have firefighters who have completed formal training in hazardous materials incident response. In the past these entities have conducted hazardous materials emergency response drills at the existing Almond Power Plant. The most recent drill was held in February 2009. The Ceres Fire Division and the City of Modesto Fire Department hazardous materials firefighters are members of a countywide hazardous materials (Haz Mat) team, managed by the Stanislaus County Environmental Resources Hazardous Materials Division. The Haz Mat team will identify the type and source of the hazardous material, oversee evacuation of people, and confine the spilled material, if possible. Cleanup of the material is the responsibility of the facility causing the spill.

The Ceres Emergency Services - Fire Division has a total of four stations in its system. The closest fire station to the A2PP project site is Ceres Fire Division Station No. 3 at 420 East Service Road, Ceres, CA, 95307. The station is approximately 0.3 mile north-northeast of the A2PP (1.2 miles driving distance) and would provide the first response to the project site. Response time would be approximately 2 to 3 minutes in daylight hours, and 3 to 4 minutes in nighttime hours.

5.14.5.4 Codes

The design, engineering, and construction of hazardous waste storage and handling systems will be in accordance with all applicable codes and standards, including:

- The Uniform Fire Code
- The Uniform Building Code
- The Uniform Plumbing Code
- California Building Code
- California Fire Code
- Stanislaus County codes and ordinances

5.14.6 Agencies and Agency Contacts

Several agencies, including EPA at the federal level, and DTSC and the California Environmental Protection Agency at the state level, regulate nonhazardous and hazardous waste and will be involved in the regulation of the waste generated by the A2PP. The regulations, however, are administered and enforced primarily through the Stanislaus County Environmental Resources Hazardous Materials Division, which is the designated CUPA. The persons to contact for nonhazardous and hazardous waste management are listed in Table 5.14-5.

TABLE 5.14-5
Agency Contacts for Waste Management

Issue	Agency	Contact
Nonhazardous Waste		
Solid Waste and Recycling	Stanislaus County Environmental Resources Solid Waste Management and Landfill Divisions 3800 Cornucopia Way Suite C Modesto, CA 95358 Phone: (209) 525-6700 Fax: (209) 525-6774	Ron DeLong Manager – Solid Waste Management (209) 525-6781 rdelong@envres.org Ron Grider Manager – Landfill (209) 837-4816 rgrider@envres.org
Hazardous Waste		
Hazardous Waste Compliance and Inspections	Stanislaus County Environmental Resources Hazardous Materials Division 3800 Cornucopia Way Suite C Modesto, CA 95358 Phone: (209) 525-6700 Fax: (209) 525-6774	Nicole Damin Manager (209) 525-6725 ndamin@envres.org Beronia Beniamine and Robert Reiss Senior HMS Officers (209) 525-6746 bbeniamine@envres.org rreiss@envres.org

5.14.7 Permits and Permit Schedule

The temporary storage of hazardous wastes at the A2PP will be included in the existing Hazardous Materials Business Plan (HMBP) for the Almond Power Plant. The revised HMBP will include both the A2PP and Almond Power Plant and will be submitted to the Stanislaus County Environmental Resources Hazardous Materials Division as described in Section 5.5, Hazardous Materials. No additional permits are required.

5.14.8 References

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Wallace-Kuhl & Associates, Inc. (WKA). 2009. Phase I Environmental Site Assessment – Almont 2 Power Plant, Ceres, Stanislaus County, California. Submitted to Turlock Irrigation District, February 9, 2009.