







5 Miles Radius Map of Project: PL15-0106 APN: 099-0-060-565

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ODOR MINIMIZATION PLAN For Centralized Waste Treatment Facility

RI-NU Services, LLC

815 Mission Rock Road Santa Paula, CA 93060

Revised January 2019 Updated November 2020

Prepared for:

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County of Ventura Initial Study PL15-0106 Attachment 17 - Odor Minimization Plan

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ODOR MINIMIZATION PLAN For Centralized Waste Treatment Facility

Ri-Nu Services, LLC Santa Paula, California

January 2019 Updated November 2020

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PROPOSED ODOR MINIMIZATION PLAN

RI-NU Services, LLC Santa Paula, CA

November 2020

1.0 INTRODUCTION AND SUMMARY

Facility Name:	RI-NU Services, LLC
Facility Address:	815 Mission Rock Road Santa Paula, California 93060
Site Contact:	Timothy J. Koziol, (915) 323-7200
Type of Material Processed:	Non-Hazardous Centralized Waste Treatment Facility
Scale of Operation:	Approximately 6.6 acres

This Odor Minimization Plan (OMP) is intended to provide guidance to on-site personnel to properly monitory, assess, and mitigate odor impacts resulting from the handling, storage, and transport of waste fluids at the RI-NU Services, LLC Facility. In general, this handbook should be used to accomplish the following objectives:

- 1. Monitor site conditions and resulting odor emissions using accepted techniques.
- 2. Minimize origins of odor from the Facility, to the extent feasible.
- 3. Implement corrective actions as required to mitigate odor impacts resulting from Facility operations.

This OMP will be maintained on-site and revised as necessary to reflect any changes in the design or operations of this site. This OMP should be reviewed annually to determine if any revisions are necessary.

1.1 Site Operations

The operations at the RI-NU Services, LLC (RI-NU) Facility (Facility) include: accepting, treating, and offsite disposal of various types of non-hazardous waste streams. Trucks from waste producing operations transport non-hazardous waste to the Facility. The Facility accepts non-hazardous wastes which include domestic wastes, industrial wastewater, oily wastewater, and oilfield sludge wastes. The Facility pumps waste from incoming trucks into enclosed tanks for temporary storage before treatment. Wastes which contain oil are pumped into enclosed tanks with vapor recovery systems which are routed to an emission control system (e.g. carbon drums). The Facility treats waste with equipment such as shakers, centrifuges, clarifiers, and screens. Solids that are extracted from the treatment process for nondomestic industrial wastes are moved to a mixing area where sawdust is incorporated for solidification. The mixed materials and treated fluids are transported off-site for disposal. The domestic waste treatment system will be enclosed and designed to minimize odorous emissions. Solids will be dropped from the centrifuge through an enclosed chute into a closed top bin. Liquids will be sent to closed tanks and eventually into trucks for transportation to an offsite disposal facility. Closed bins of solids generated from domestic waste treatment will be sent off-site for disposal. Primary potential sources of odor generation include incidental spills from transferring waste streams, the domestic waste treatment operation and the solids mixing operation.

1.2 Meteorological Conditions

The Facility is located within the Mediterranean or subtropical dry summer climate zone, experiencing mild winters and warm, dry summers. Onshore breezes from the west are typical at the Facility. Strong, dry Santa Ana winds can also originate from the east, typically during the fall and winter months. The annual average temperature in the area is 61.2°F. The annual average minimum temperature is 47.5°F and the annual average maximum temperature is 75.0°F. Summer daytime temperatures often exceed 100°F. The average annual precipitation is 17.93 inches, and the primary months of precipitation are November through March. (*Western Regional Climate Center, 2016*)

Compiling historical wind data from nearby Santa Paula Airport from 2012 to 2018, average wind speeds in the area are estimated at 4.9 mph and generally blow from the west/southwest (onshore). As such, sensitive receptors to the east of the Project site have a greater potential to be impacted by odors originating from the Facility.

Overall, climatic conditions in Ventura County are not expected to significantly affect the waste treatment operation.

1.3 Proximity of Potential Odor Receptors

The Facility is located in unincorporated Ventura County in an M3 industrial zone, and is surrounded by industrial and agricultural land uses. To the East and South of the Facility, the area is zoned as M3 and includes industrial facilities like Western Oil Spreaders, an overflow car park, and a vehicle scrap yard. To the West and North of the Facility, the area is zoned as AE-40 ac/MRP and includes agricultural operations. A residence exists immediately adjacent to the southwest corner of the Facility within the agricultural exclusive zone. Less than 6 residential properties are scattered within a 0.5-mile radius of the Facility, in both the agricultural and industrial zones.

1.4 Historical Complaints

The Ventura County Air Pollution Control District (VCAPCD) is the primary agency that receives odor complaints. A record of complaints was obtained from the VCAPCD which spans from 1996 to 2015. During this time period, 24 odor complaints or approximately one odor complaint per year were received.

Many of the historic odor complaints may be accounted for by former lined open pit operations that historically were conducted onsite. The open pit operations were used for waste processing (dewatering/drying of solids) and are evident in aerial photos up to 2014. The open pit operations may have created excessive odors. Open pit treatment of wastes has ceased and will not be conducted in proposed future operations at this Facility.

2.0 POTENTIAL SOURCES OF ODOR

The potential sources of odor at the Facility include:

- Waste spillage at the main offloading area (labeled A on the site plan),
- Vapor produced from enclosed industrial and domestic waste receiving tanks (labeled 4 on the site plan),
- Solid materials stored in mixing area #1 and #2 (labeled Mix Area #1 and Mix Area #2 the site plan),
- The transportation and storage of domestic sewage waste in enclosed waste receiving tanks (labeled 4 on the site plan in the domestic sewage area).
- The domestic waste treatment operation.

Incoming industrial waste enters the Facility through the truck entrance and it is taken directly to the main offloading area. Facility personnel then transfer influent waste into the waste receiving tanks. Facility personnel are adequately trained to transfer influent waste without resulting in a spill. However, the transfer process may result in incidental waste spills that may produce offensive odors.

The waste receiving tanks, adjacent to the main offloading area, will store all incoming, non-domestic wastes, including non-hazardous oilfield waste, for processing. The waste in the receiving tanks may generate vapors that could cause offensive odors; however, the non-domestic waste receiving tanks are fitted with a vapor recovery system which remove and recover produced vapors. The recovered vapors are then transferred through an enclosed pipe to a vapor control device (e.g. carbon drums). The vapor control device is not expected to produce significant odors. Therefore, the storage of non-domestic waste in the waste receiving tanks is not expected to produce significant odors.

As the waste stream is moved through the industrial waste treatment process, solids are removed from the waste solution. The extracted solids tend to be wet so they are immediately mixed with additives, typically sawdust or mulch, to form a physically stable material. The mixing process occurs in Mixing Area #2 which is an uncovered, sub-grade, contained area. Mixing is conducted with a front-end loader.

Solids in Mixing Area #2 are continuously mixed with additives until sufficiently solidified. After mixing, the solids are moved to Mixing Area #1 for temporary storage. Mixed solids will normally be transported off site within one hour of being mixed. If mixed solids are left for longer periods or overnight they will be covered to minimize emissions. No unmixed solids will be left overnight. Mixing Area #1 and #2 may produce offensive odors; however, proper housekeeping and storage of mixed material will significantly limit the release of offensive odors.

Incoming domestic waste enters the Facility through the truck entrance and it is taken directly to the domestic waste receiving tanks (labeled "Cone Bottom Tanks" on the site plan in the domestic sewage area). Facility personnel then transfer influent domestic sewage into enclosed holding tanks. Facility personnel are adequately trained to transfer influent waste without resulting in a spill. However, the transfer process may result in incidental domestic sewage spills that may produce offensive odors. The treatment process itself will be conducted in an enclosed system:

- Domestic waste will be pumped from the trucks through a basket screen or screen box to remove larger solids and then to closed top mixing tanks.
- From these tanks the waste stream will pumped through an enclosed centrifuge where solids

and liquids will be separated.

- Liquids will be sent to closed tanks and eventually into trucks for transportation to an offsite disposal facility .
- Solids will be dropped from the centrifuge through an enclosed chute into a closed top bin. Once full, the bin will be shipped offsite to dispose of the solids.
- The practice of mixing domestic waste solids with other solids in the mixing pit will not be conducted.

The goal is to minimize open tanks and process equipment in the domestic treatment system. We expect that this will result in reduction of odor to acceptable levels. All of the tanks and centrifuge will be set up with vapor recovery fittings in case additional odor control is needed. Recovered vapor could be sent to a compost/wood chip biofilter for additional odor control if needed.

3.0 ODOR CONTROL MEASURES

3.1 Design Considerations

- Facility Siting: The siting of the waste treatment operations in agricultural/industrial Ventura County away from many sensitive receptors is an acceptable site to reduce the potential for odor complaints. The Facility is located in an M3 industrial zone. The Facility is bordered to the East and South by industrial uses, and to the West and North by agricultural uses and less than 6 residences.
- Equipment Design: Non-hazardous oilfield waste materials are stored in enclosed waste receiving tanks (labeled as 4 on the site plan) with vapor recovery systems. Vapor recovery systems remove and recover produced vapors from the storage tanks. The recovered vapors are then transferred through an enclosed pipe to a vapor control device. The enclosed vapor recovery systems and control device are expected to eliminate offensive odors produced by influent waste storage.

Domestic waste will be stored in closed tanks and processed through an enclosed system. If needed the system can be fitted with vapor recovery with vapors routed a compost/wood chip biofilter for additional odor control.

- **Equipment Reliability:** A comprehensive preventive maintenance program will be implemented to ensure the reliability of all equipment and vehicles, and to maintain equipment in good working order. Stationary equipment will be maintained on-site on a regular basis.

3.2 Operational Considerations

The primary potential sources of odor from this Facility include incidental waste spills and storage of processed solids. Odor emissions from the transport, transfer, and storage of waste materials will be minimized through best management practices (BMPs). The Facility has implemented the following BMPs to minimize odors:

- Open pit treatment of wastes will not be conducted in proposed future operations at this Facility.
- The main offloading areas (industrial and domestic) will be washed down as needed to remove incidental spilled wastes that may generate offensive odors. The washdown water will be

recovered and pumped into the waste treatment system.

- Mixing Area #2 will only be used for the mixing of the solids generated by the industrial waste treatment operations with a solidification agent (typically sawdust). The solids will not be located in the mixing area more than four hours in duration before being mixed and transferred to Mixing Area #1. Mixing Area #2 will be cleaned out after each use. (These are conditions from the facility's former VCAPCD permit #00171 and are expected to be required in a future permit).
- The mixed solids in Mixing Area #1 will be covered except when solids are being placed into or taken out of the area. During trucking hours (7AM to 7PM), mixed solids will normally be transported off site within one hour of being mixed. If circumstances require mixed solids to be left for longer periods, such as after trucking hours, mixed solids that cannot be shipped off-site for disposal will be covered. The covering will consist of continuous heavy-duty plastic sheeting (4 mil or greater) or other covering to minimize odorous emissions to the atmosphere. The covering will be in good condition, overlapped at the seams, and securely anchored. (These are conditions from the facility's former VCAPD permit #00171 and are expected to be required in a future permit).
- If other BMPs do not effectively reduce odor emissions a chemical deodorizer may be employed.
- Facility personnel will be trained in the contents of this OMP.

4.0 ODOR IDENTIFICATION REPSONSE

4.1 Self-Inspections

The primary objective of self-inspection is to identify and minimize odors from the Facility before it affects the surrounding communities. This is accomplished through the use of routine self-inspections by Facility personnel.

- Routine Daily Odor Monitoring: Facility personnel will be trained to continually monitor the facility work areas for offensive odors. When Facility personnel detect an elevated odor of sufficient intensity that could lead to detection off-site, they will report the elevated odor to their supervisor. The supervisor then investigates the source. The investigator will inform the proper staff so that the problem area can be addressed by operations personnel.
- Weekly Facility Perimeter Odor Monitoring: At least weekly Facility personnel will walk the perimeter of the facility during the morning to check for potential odor issues. The morning event will typically be completed within two hours of sunrise. This is because as the day progresses, rising temperatures create erratic wind shifts and increased wind velocity. The early morning monitoring creates a worst-case bias. Winds are relatively calm and the heavier chemical constituents have settled to the ground causing the highest potential for odor detection.

4.2 Complaint Response Protocol

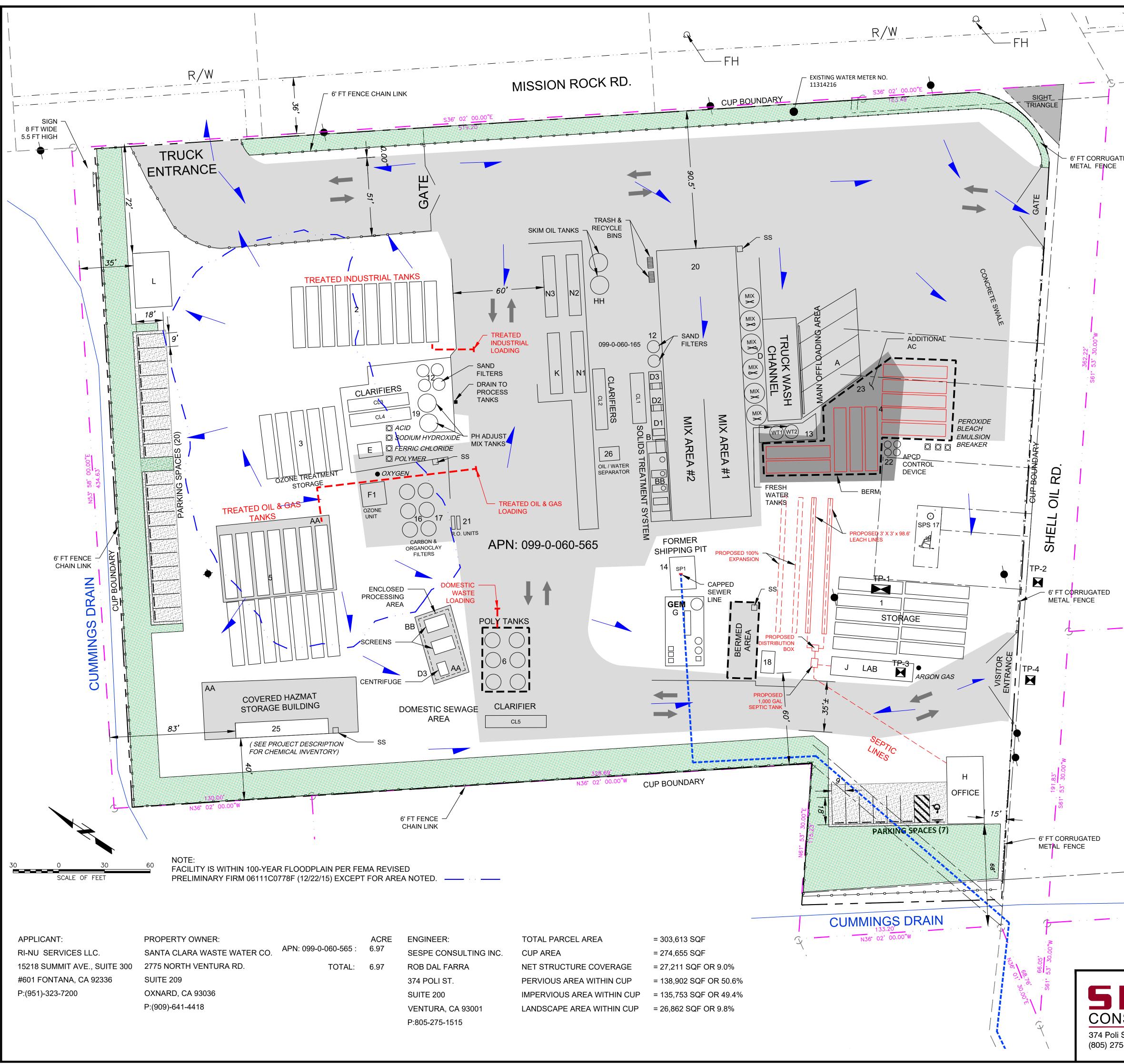
Complaints may be received by either the Facility, the VCAPCD or other local government agency. The Facility operator will document odor complaints using the Odor Complaint Log found in Appendix 2. The

following protocol will be followed to ensure odor complaints are received, investigated and addressed in a timely manner.

- The operator receives and reviews the complaint. The operator documents complaints in the site operations log and on the attached odor complaint form.
- The operator will go to the location of the complaint to assess if the Facility may be responsible for the odor.
- If the facility operations are responsible for the odor issues, the operator will implement appropriate measure to mitigate the odor source (e.g. cover piles, wash down areas, etc.).
- The operator and complainant (if known and choosing to participate) shall meet within a reasonable period to assess the original problem and results from implementing the odor mitigation measures.
- Actions and results will be documented in the Odor Complaint Log which serves as the operation's permanent record.

APPENDIX 1

Figures



T CORRUGATED TAL FENCE		SQ. FT. COMMUNITY	-INKERTON GO		PROJECT LOCATION	
LEC	GEND			VICINITY	MAP	
	LOT LINE PARCEL 6 FT HIG x x 6 FT HIG x x 6 FT HIG	LINE H CHAINLINK FENCE H CORRUGATED MET	AL FENCE	 FIRE HY EDISON BERM DAY TA CHEMIC 	C ARROW DRANT (FH) POWER POLE NK" IN USE AL ON CONTAINMENT	
	LANDSC/ GRAVEL	ED AC./CONCRETE APE AREA SURFACE N OF BACKHOE ATION TEST PIT		 O ACTIVE DRAINA SS □ SAFETY SEWER TP-2 LOCATIO 	ONED OIL WELL OIL WELL GE DIRECTION SHOWER/EYEWASH LINE TO OXNARD ON OF BACKHOE ATION TEST PIT	
N = N E = E		2010 Approved CUP E Receiving Bays (4) Trash/Grit Removal Unit	А		E E E E E E E E E E E E E E E E E E E	
		Centrifuge Unit Centrifuge Unit	CL1-5 D D1 D2	5 Clarifier Units (5) Mixing Tanks (6+) Centrifuge Unit Centrifuge Unit	E N E E	
	D3 D4 E	Centrifuge Unit Belt Press Electro-Coagulation Unit	D3	Centrifuge Unit Electro-Coagulation Unit or	cother Metal Removal Unit N	
	F1 F2 G H	Ozone Unit #1 Ozone Unit #2 UV/Oxidation Unit Double Wide Office Trailer	G H	Ozone Unit GEM Unit 1056 sq. ft. portable trailer	N	
		Temporary Office Trailer Laboratory/Receiving Office Maintenance Shed Employee Changing Room		648 sq. ft. portable trailer (1 Maintenance Shed 864 sq. ft. portable trailer (4	E	
RUGATED	M N1 N2	Break Room (old receiving office) Sea Container (records storage) Sea Container (parts storage)	N1	Sea Container (records storage) Sea Container (parts storage)	age) E	
		Sea Container (parts storage) Sea Container (parts storage) Sea Container (parts storage) Sea Container (parts storage)	N3	Sea Container (parts storag	2) E	
	N7 O P Q	Sea Container (parts storage) Sea Container (chemical storage tr. Auger CKD Silo	ailer)			
	AA BB CC DD	3 – concrete pads 2-Plate Presses on concrete Blocks Old Office (removed) Old Air Stripper Unit (removed) Old Tool Shed Old Carbon Filters		3 – concrete pads 2-Shaker Units (screens)	E N 	
		Old Frac Tank Old Skim Tanks (2) w/ concrete sec 4 – Old Frac Tanks		Skim Tanks (2)	N	
	1 2 3 4	10 - 5000 gallon process tanks7 - 5000 gallon process tanks20 - 5000 gallon process tanks40 - 5000 gallons process tanks	1 2 3 4	10 - 20,000 gallon waste red 10 - 20,000 gallon process ta \$ - 20,000 gallon process ta 10 - 20,000 gallon waste red	anks E nks E	
	5 6 7 8 9 10	Pond #1 (surface impoundment) (f 20 – 5000 gallon process tanks Pond #2 (surface impoundment 10,000 gallons process tank 10,000 gallons process tank 10,000 gallons process tank	5	14 – 20,000 gallon process to 6 - 6,000 gallon poly process	anks E	
		Offloading pump Sand Filters (6) Sand Filters (6)	13		N N N	
GATED E	14 15 16 17	Shipping Pit 10,000 gallons process tank Carbon Filters (2) Micron Filtration Pods	16		E N N	
	18 19	Diesel Fuel Tank (w/secondary con 5 – 5000 gallon process tanks Five Receiving Bays: Bay-3, Industr	tainment) 18 19	Diesel Fuel Tank (w/second		
	TBD	and (2) Screening Bays Stockpile storage and recycle area; Two reverse Osmosis Units; One Control Device;	20 21 22	Stockpile storage and recyc Two reverse osmosis units One VCAPCD Control Devic	(or equivalent technology) N	
	TBD TBD TBD	30- Water Processing Tanks All Awnings and concrete pads Three foot deep grass storm water		New 4,852 square foot cond 610 sq. ft. hazardous materi	crete pad N	
	N/E – N	Total Approved Process Tar ew or Existing on Site	26 ks = 143	oil/water separator Total Proposed P	rocess Tanks = 95	
5 E 5 F CONSULTING , 374 Poli Street, Ste. 200 • Ve (805) 275-1515 • www.sespe	entura, CA 93001	R TF	ECT SITE ADDRESS:	STE WATE T FACILI E PLAN - SI	ΤY	A

NCZ0 ZONE:

M3 10,000 SQ. FT.

APPENDIX 2

ODOR COMPLAINT LOG

ODOR COMPLAINT LOG

Received by:

Date Received:

COMPLAINANT		
Name:		
Address:		
Contact Phone #:		

	ODOR DESCRIPTION				
Date:		Time:		Odor duration:	
Location:	□ Verified as c	oming fro	om Facility?		
Odor Intensity:	Very faint	🗆 Light	□ Moderat	e 🛛 Stron	g 🛛 Very strong
Description of Alleged Odor(s):					

	INSPECTION RESOLUTION/RESULTS			
Actions				
taken by				
Operator:				
Follow-Up				
with				
Complainant				
(phone call,				
visit, etc.)				

Signature: _____

Date: _____

OPERATIONS AND MAINTENANCE MANUAL

INDUSTRIAL WASTEWATER TREATMENT PLANT RI-NU Services LLC 815 MISSION ROCK ROAD SANTA PAULA, CALIFORNIA 93060

> EnSafe Project Number 0888819300

> > **Prepared by:**



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January 2017

County of Ventura Initial Study PL15-0106 Attachment 18 - Proposed Operations and Maintenance (O&M) Manual

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- Appendix A City of Oxnard Industrial Discharge Permit
- City of Oxnard Sewer Use Ordinance (Chapter 19 of the Oxnard City Code) Appendix B
- Process Flow Diagram Appendix C
- Appendix D Facility Layout
- Appendix E
- Safety Data Sheets Sample Daily Shift Log Appendix F
- Appendix G Additional Forms



1.1 INTRODUCTION

1.2 Manual User Guide

This Operations and Maintenance Manual (O&M Manual) is intended to meet, in part, regulatory requirements promulgated by the United States Environmental Protection Agency at Title 40 Code of Federal Regulations (CFR) 437 for The Centralized Waste Treatment Point Source Category, Subpart D — Multiple Wastestream, for RI-NU Services LLC's (RI-NU) industrial wastewater pretreatment system located at 815 Mission Rock Road in Santa Paula, California. Specifically, this document is developed and must be maintained onsite to meet the requirements for Onsite Compliance Paperwork as defined at 40CFR437.41(b), in support of initial and periodic certification statements for pretreatment. This O&M manual has thus been prepared to describe and document the procedures to be followed to ensure that the pretreatment systems are well operated and maintained, and where applicable why these adopted procedures ensure compliance.

Successful facility operation also implies compliance with the conditions of a permit for discharge granted by the City of Oxnard Department of Public Works, Water Resources Division Wastewater Section, attached as Appendix A.

This O&M Manual is intended to provide guidance for wastewater technicians operating the pretreatment system and to be a training tool for all employees at the facility. This O&M Manual is a dynamic document, which will be updated as necessary to reflect any future changes to the system layout, operations, or other changes at the facility. This O&M manual includes a process description, general guidelines for process operations, sampling and testing, personnel responsibilities, record keeping, system maintenance, and emergency operation.

The information contained in this manual is intended to provide an overview of O&M. Where equipment-specific data or information is required for specific operational or maintenance tasks, the technician or maintenance personal should refer to specific procedures and the equipment manufacturer's literature. These manuals, when used in conjunction with recommended maintenance schedules, can form the basis of a preventive maintenance program, which can result in reduced plant down time.

In preparing this manual, it is impractical to describe every potential operating condition, maintenance requirement, or problem which may occur within the facility. Operators and maintenance personal are encouraged to use this manual as a guide in tandem with sound judgment, experience, and testing to assure that treated effluent that is in compliance with the terms and conditions of the Oxnard Department of Public Works Discharge Permit and the Oxnard Municipal Sewer Use Ordinance.

1.3 General Description

The RI-NU industrial wastewater treatment plant, located in Santa Paula, California, operates as a centralized waste treatment (CWT) facility, and receives wastes from numerous industries and activities. As received, these wastewaters may contain pollutants, in particular metals, oils, suspended solids, and organics, which require treatment and removal prior to discharge into the conveyance line connected to the Oxnard municipal sewer system. Wastewater sources potentially treated at this facility include (but are not limited to) coolants or metal working fluids, oil field production water, boiler blowdown water, equipment wash waters, landfill leachates, and industrial rinse waters.

RI-NU is not a direct wastewater discharger (i.e., it does not discharge to a public waterway), but is considered to be an indirect discharger, or pre-treater, which discharges treated wastewater to the City of Oxnard's Municipal Wastewater System. The City of Oxnard manages the local sewer system and treatment plant designed to collect and treat domestic, commercial, and certain industrial wastewater within its service area.

A process and instrumentation diagram for the system is provided in Appendix C, with a facility diagram showing equipment layout provided in Appendix D. These figures will be updated accordingly as modifications are made to the facility.

1.4 Discharge Standards

Oxnard Department of Public Works (ODPW) is the local control authority and enforces the discharge regulations applicable to the RI-NU facility. The discharge from the RI-NU facility is regulated by ODPW at the point where RI-NU discharges the treated wastewater into a dedicated conveyance line connected to the sanitary sewer system. As a CWT facility, RI-NU is subject to national categorical standards (40 CFR 437, which apply to RI-NU's Subpart D (multiple waste subcategory) permit. In addition, ODPW establishes local limits to control discharges from industrial users. The limits are established to protect the sewage conveyance system, water quality of the POTW's receiving stream, the quality of the bio-solids or reusable sludge produced by the POTW, and the operation of the municipal treatment plant. In RI-NU's permit, the more stringent of the local or categorical limits applies for each regulated parameter.

RI-NU has one point where process wastewater is discharged to the sanitary sewer system. ODPW requires that the terms and conditions of the Permit be met at this discharge point, which is a storage area below ground surface designated as the "shipping pit." Before reaching the shipping pit, there is a sample port that the operator or chemist can access to test for compliance or visually inspect the treated effluent.

In addition to these numerical limits, the Permit states types of discharges that are strictly prohibited from introduction into the sanitary sewer, due to the possible interference or inability to be treated at the POTW. Please refer to the Permit in Appendix A for further discussion of these prohibited discharges. The operator should be familiar with the prohibited discharges.

1.5 Industrial Wastewater Treatment System

The industrial wastewater treatment system at the RI-NU facility consists of a chemical precipitation system designed to treat metal-bearing wastewaters, an organics removal system, and an oily water and solids separation system.

The system consists of typical unit processes: wastewater segregation, wastewater storage, solids separation (including a shaker, centrifuge, and clarifiers), metal precipitation (including coagulation, flocculation, settling, and sand filtration), emulsion breaking, oil-water separation, chemical oxidation, advanced dissolved air flotation (via a gas-energy mixing [GEM] system), bag filtration, organo-clay adsorption, and granular activated carbon adsorption. Solids removed from the wastewater process are dewatered via a centrifuge, and the sludge is bulked and solidified as needed before shipping offsite for disposal at a licensed facility. Characterization of wastes sent offsite for disposal is conducted in accordance with the facility's Waste Analysis Plan (WAP).

In a physical/chemical treatment plant, the removal of contaminants requires the addition of various treatment chemicals that perform different functions within the individual treatment processes. The primary treatment chemicals added to the system include the following:

- Sulfuric acid
- Sodium hydroxide solution
- Ferric chloride
- Aluminum sulfate
- Pure-Flo 829 (flocculant polymer)
- GFT 4963 (oil treatment polymer)
- Hydrogen peroxide (chemical oxidizing agent)
- Sodium hypochlorite
- Ozone

The liquid chemicals are stored in drums or totes on spill containment pallets within the hazardous materials storage building for the purposes of chemical segregation and spill containment. Chemical tanks that are actively being used as part of the treatment system are re-filled as needed by



transferring material from the storage building's drums/totes to the active tank(s) using appropriate pumps/hosing. Once transferring is complete, all drums/totes that were removed from the storage building are transferred back into the storage building. The polymers may be obtained in the solid form, in which case dilute solutions are prepared onsite, and then stored in the respective storage tank or container. Polymer delivered in the liquid form will be stored in its provided container. Ozone is generated on-site using an ozone generator. The ozone is then injected into the treatment system. Safety data sheets for these chemicals are presented in Appendix E.

2.1 INFLUENT WASTEWATER EVALUATION AND ACCEPTANCE

2.2 Wastewater Sources

The treatment system receives flows from various industrial clients which vary from day to day. During the profile development process, clients are required to provide information regarding the wastewater, including laboratory analytical test results, to determine whether or not the wastewater can be accepted by the facility. Wastewater must not contain chemicals prohibited from discharge, or properties that categorize the wastewater as Resource Conservation and Recovery Act (RCRA) or non-RCRA hazardous waste (California hazardous). While the facility maintains a Waste Analysis Plan (WAP) that covers acceptance criteria and characterization of waste generated on site, a summary of waste acceptance procedures is provided below.

California hazardous waste is regulated under Code of California Regulations Title 22, Division 4.5, Chapter 10 — Hazardous Waste System Management and Chapter 11 - Identification and Listing of Hazardous Waste (Title 22). The regulation provides the guidelines for determining if a waste is RCRA hazardous or California hazardous. The first step is determining if the wastewater is a RCRA-hazardous waste by the following steps:

- Determine if the wastewater exhibits one of the RCRA-hazardous waste characteristics
 - Ignitability (D001) if the flash point is <140° Fahrenheit
 - Corrosivity (D002) if the pH is ≤ 2 or ≥ 12.5
 - Reactivity (D003)

- Toxicity (D004 through D043) is determined by comparing the constituent concentrations in the analytical report to the regulatory levels that are presented in 22 CCR §66261.24. If the concentrations exceed the regulatory levels, the wastewater is a RCRA hazardous waste.

- Determine if the wastewater is a listed waste as defined by 22 CCR §66261.31 through §66261.33(f). Listed wastes include the following:
 - Wastewater from non-specific sources (F-Listed)
 - Wastewater from specific sources (K-Listed)
 - Discarded unused products including acutely hazardous (P-Listed) and toxic (U-Listed).

If the wastewater does not meet the definition of a RCRA-hazardous waste, then the following steps will be completed to determine if the wastewater meets the definition of a non-RCRA hazardous waste:

• Determine if the wastewater exhibits a non-RCRA corrosivity or toxicity characteristic.



- Determine if the wastewater is on the M List
- Determine if the wastewater is found on or contains substances listed in Appendix X of Title 22.

If the wastewater is determined to be a non-hazardous waste, then it is acceptable for treatment at the facility. RCRA and non-RCRA hazardous wastes will not be accepted into the facility.

Some wastewaters that violate the hazardous waste characteristics above may be exempt from being labelled as hazardous under the Title 40 Code of Federal Regulations (40 CFR). The full list of exemptions is given in 40 CFR, Section 261.4. Oilfield exploration and production (E&P) exempt wastes are discussed in detail in the facility's WAP.

The facility has developed a program to bench test all wastes prior to acceptance to determine if the waste is treatable. Prior to acceptance of wastewaters, operators request a sample of wastewater with characterization data to perform bench scale treatability tests. Once a waste has been accepted by the facility via the profiling process, it can be scheduled for delivery to the facility.

The facility will be processing wastewaters which contain industrial metal-bearing wastes, oily wastes, and organic-bearing wastes. Wastewaters are unloaded by gravity from tanker trucks into distribution pipes before being pumped to holding tanks that are connected to the treatment process.

2.3 Influent Characteristics and Chemistry of Treatment

Influent wastewater characteristics vary day to day depending on client waste delivery. All wastewater streams will come with waste manifests, be inspected and tested by the operator, and evaluated on the bench to determine whether the process can successfully treat them prior to accepting and/or treating the waste.

Influent wastewater may be characteristic of one or more of three categories: metals-containing wastewater (Type A), organics-containing wastewater (Type C), oily wastewater (Type B). Wastes will be classified as one of the three CWT waste types in accordance with the CWT Small Entity Compliance Guide. It should be noted that the classification of the waste as one of the three CWT waste types does not solely dictate the treatment performed on that waste stream. For example, a Type C waste with metals concentrations above discharge limits will require metals treatment. The onsite chemist will determine the treatment needs of influent wastewater based on discharge limits. Note that some incoming wastes will have concentrations of metals, organics, and oils that are below discharge limits; however, these wastes must still be classified as one of the above waste types.

The treatment of different waste streams requires drastically different chemistries to meet the desired effluent limits. It is essential for the staff chemist to fully understand the chemistry of treatment for all waste streams to properly perform bench scale testing, so that treatment can be optimized in the full-scale system.

2.3.1 Treatment Chemistry for Metals-containing Wastewater

The primary mechanism for the removal of metals is through hydroxide precipitation. In the precipitation step, the pH is raised with sodium hydroxide (caustic) to a value necessary for effective precipitation of metals in the wastewater. Precipitation is the chemical process of converting the soluble dissolved metals into an insoluble solid form as a metal hydroxide so that they can be physically removed from the wastewater. Different metals and different solutions will have different ideal pH values for the precipitation of a metal hydroxide; therefore, it is essential that the staff chemist determine this ideal pH prior to treatment.

Some metals cannot be sufficiently removed simply by application of hydroxide precipitation because of complexing or chelation. It is important for the chemist to understand the principles of metals precipitation and its limitations, and presence or absence of chemical constituents that may complicate metals removal.

For some wastewaters, coagulation is used to further enhance metals removal in addition to hydroxide precipitation. Coagulation is the process by which a coagulant is added to the wastewater to destabilize metal solids (floc) that are in suspension. This condition makes the floc more readily stick together, which increases the speed at which the solids settle out of the solution.

Regardless of the use of coagulation in conjunction to metal hydroxide precipitation, flocculation is needed to help metal particles settle. Flocculation is the process in which a flocculant polymer, forms "chains" or "strands" that adsorb to the particles, in effect "bridging" them together to grow larger, heavier particles that settle faster. The polymeric flocculant can also assist with coagulation by neutralizing the charge on the metal particles.

The polymer and wastewater are blended so that the polymer coats and binds to the small precipitated metal particles. The coated particles gently collide and agglomerate (i.e., stick together) to form larger particles. Once metals are allowed to precipitate and agglomerate, floc is allowed to settle by gravity in a clarifier. Additionally, solids can be further removed in the GEM system through use of dissolved air flotation. In the GEM system, air and flocculant chemicals are injected into a high-pressure (100-120 psi) waste stream. The dissolved air forms small bubbles on discharge to a chamber fitted

with surface skimmers that cause neutrally buoyant floc, and oils and greases if present to rise to the top and be skimmed from the water.

2.3.2 Treatment Chemistry for Organics-Containing Wastewater

The primary means of organics treatment at this facility will be through the use of chemical oxidation and activated carbon adsorption. If a wastewater stream is determined to require pre-treatment prior to carbon adsorption, chemical oxidation will occur. Chemical oxidation is the process in which constituents are broken down (usually into less harmful byproducts) through chemical reactions. Chemical oxidation will be used to support the treatment of organics by activated carbon. Chemical oxidants at the RI-NU facility, which include hydrogen peroxide and ozone, will be dosed to degrade higher strength wastes or in some cases larger more recalcitrant compounds, so they are more easily removed by carbon, as needed. The chemist may also determine to dose a waste stream with an oxidant to reduce odor or color. Ozone is a strong oxidizer that is generated on site and injected into the process stream with inline mixing to provide thorough contact and effective oxidation.

Organic containing wastewaters are then treated by being pumped through bag filters to prevent fouling of downstream media, then a column of granular activated carbon (GAC). It is important for the GAC adsorption step to occur after ozonation for the purpose of destroying residual ozone, removing ozonation by-products, and preventing bacterial growth on the media. Both liquid and gas phase organic contaminants can adsorb to the activated carbon, thus trapping it in the column. This process is dictated by the properties of the carbon, the contaminants being targeted, the concentration of the contaminants, and the temperature of the water. When there is suspected oil and grease content in a wastestream, the operators can route the wastewater through the GEM and as needed, the organo-clay media as pretreatment to remove oil and grease and extend the capacity of the GAC columns for dissolved organic compounds.

In any case, care must be taken to ensure that the GAC columns are not fully saturated, or otherwise expended to the extent that contaminants are released back into the wastewater stream at concentrations approaching pretreatment standards. For this purpose, the facility is equipped with vessels that can be operated in a lead/lag configuration, with individual vessels switched as saturation is observed on the first vessel. This setup provides a safeguard to assure compliance with the sewer discharge criteria.

2.3.3 Treatment Chemistry for Oily Wastewater

The primary method used to separate oil from water is by gravity separation. Absent the presence of surfactants or other dispersant chemicals, oil and water are naturally insoluble, so given time; oil will

separate from the water. In the instance that oil and water are emulsified, and prevented from separating, it is the responsibility of the staff chemist to determine a means of breaking the emulsion. The majority of emulsions expected at this facility will likely be in the form of surfactants. A surfactant has a hydrophobic end that has an affinity for oil, and a hydrophilic end that has an affinity for water, which allows for emulsions to stabilize. The treatment of emulsified oil requires the destabilization of the emulsion, usually by altering the surfactant. Surfactants may be destabilized by finding a pH in which the surfactant is denatured, or it may be possible to utilize polymer, ferric chloride, or alum to preferentially bind to surfactants.

Oily water that is not emulsified (or water that after the emulsion has been broken is drained from the tanks used for emulsion breaking) is pumped through and oil/water separator. Oil accumulates on the surface of the separator and drains to a collection tank. The aqueous phase or water is conveyed for further metals or organics treatment as needed.

Because there is the possibility for dissolved organics and or finely divided oil droplets in this treated wastewater, it can be treated further by processing through the GEM unit, and/or through bag filters to remove solids and protect downstream media, and the organo-clay media to trap any additional traces of immiscible oil, followed by granular activated carbon polishing.

2.4 Wastewater Evaluation

Prior to accepting any wastewater or obtaining samples to test on the bench, the waste profile and analytical data must be evaluated to confirm the wastewater meets the requirements for acceptance to the facility. Waste acceptance criteria are discussed in detail in the facility's WAP. If the profile and analytical data indicate the wastewater is acceptable, a sample will be obtained to evaluate for treatability and necessary chemical dosing. This will ensure that the treatment process will be able to effectively remove contaminants of concern without leading to permit violations. The wastewater evaluation process is as follows:

- After profile and analytical data from a California-certified laboratory are reviewed and approved by RI-NU, sample wastewater and evaluate whether treatment is feasible based on source.
- Evaluate sample by visual inspection, scent, and physical characteristics.
- If the wastewater is deemed to be acceptable, determine whether waste needs to be treated for oils, organics, metals, or a combination of these. Evaluate initial concentrations of contaminants of concern by measuring (depending on waste type) metal concentrations on an



ICP, via supplied analytical results, via the HACH DR3900 spectrophotometer and associated test kits, or other suitable testing apparatuses. Test for flash point via flash point testing equipment, if deemed necessary. Oil and grease can be estimated by supplied analytical results and visual inspection.

- If the initial untreated concentration of the sample is below the discharge requirement, no further bench testing will be necessary; the wastewater falls below discharge requirements.
- For wastewater that requires treatment, perform bench scale treatability test as described in Section 2.4.
- Collect sample of supernatant from treatability test and confirm that treatment removed the contaminant of concern and the sample meets the Permit discharge standards. This is primarily for metals as the GAC system will not treat for dissolved metals. Water with residual oil that is not removed in the oil-water separator will be run through the organo-clay vessels to decrease oil and grease concentrations below discharge requirements and to protect the adsorption capacity of GAC media. The waste will then be run through the GAC system to remove remaining organic contaminants before discharge.
- If testing determines that the wastewater meets the Permit requirements, the operator can allow the delivery of wastewater via tanker trucks. The tanker truck is to gravity drain wastewater into the designated discharge pipe network. The discharge pipes are labelled based on the waste type (Type A, B, or C). Once discharge is complete, the wastewater will be pumped to the designated holding tank and subsequently into the treatment system.
- Following the delivery of wastewater to the facility, collect a sample of water from the truck to confirm metals concentration with onsite lab testing apparatuses. For any batches that do not appear consistent with the anticipated characteristics of the wastewater (physical characteristics, odor, metals concentration, etc.), a sample will be collected and the bench scale treatability test as described in Section 2.4 will be repeated to confirm the applicability of the treatment processes and dosing of that load.

2.5 Bench Scale Testing

Bench scale tests of wastewater will allow operators to determine dosing and estimate necessary treatment steps for wastewater in the process tanks. During all tests, record all starting volumes of



wastewater, chemical dosages, contact times, and settling times. These will be utilized in the operation of batch treatment.

2.5.1 Metals-containing Wastewater

The following steps will be conducted for bench scale testing of metals-containing wastewater:

- In a beaker, mix sample and observe pH; depending on source water (basing on operator experience), adjust pH up or down using caustic soda or sulfuric acid. Target pH will depend on the metal being targeted for removal.
 - Different metal hydroxides precipitate at different pH values. See Table 1 for a list of approximate target pH values for metal removal by precipitation. Use the table to set target precipitation points.
 - The operator will need to select the necessary treatment pH based on metals needing treatment in wastewater sample.
- Dose a coagulant (ferric chloride or aluminum sulfate) until visible solids form, coagulant will be selected based on chemist and operator expertise. Allow sample to mix. If addition of ferric chloride or aluminum sulfate drops the pH below the ideal precipitation pH, adjust the pH accordingly.
- Dose the polymer blend to grow floc.
- Terminate mixing to allow solids to settle.
- Evaluate the supernatant.

Table 1 Approximate pH Values for Metals Precipitation		
Metal	pH for precipitation	
Cadmium	11.5	
Chromium (III)	9	
Copper	10.5	
Lead	10	
Nickel	10.5	
Zinc	9.5	



2.5.2 Organics-containing Wastewater

Prior to bench testing or treating any organics-containing wastewater, the chemist must determine whether or not the organics-containing wastewater requires any chemical treatment in addition to granular activated carbon. Wastewaters that need chemical treatment are any organic bearing water that may contain metals, or organics that more rapidly exhaust carbon. Chemist experience will be necessary to determine which wastewaters will require treatment.

2.5.2.1 Organics Requiring Chemical Treatment

In a beaker, mix sample and test pH level; depending on source water (basing on operator experience), adjust pH up or down using caustic soda or sulfuric acid. Target pH will depend on the treatment goal of the wastewater. Once the target pH level has been reached conduct the following:

- For wastewater that contains metals refer to section 2.4.1 and follow the metals precipitation guidelines to remove the metal(s) of concern.
- For wastewater that contains compounds known to rapidly exhaust carbon, or are difficult to remove by carbon, it may be prudent to chemically oxidize the wastewater.

Based on the chemist's discretion, add the chemical oxidant at the desired treatment dose. Allow the wastewater to mix and react for 15-30 minutes, or longer for particularly recalcitrant compounds.

2.5.2.2 Organics Treatment

In a beaker, mix sample and test pH level. Depending on source water (based on operator experience), adjust pH up or down using caustic soda or sulfuric acid to neutral ranges. Once the target pH level has been reached conduct the following:

- Once pH is at neutral range, mix in a small volume of activated carbon, and allow the sample to mix for a few minutes.
- Allow the carbon to settle after mixing and once settled, place a sample of the supernatant into three, 40 mL volatile organic analysis (VOA) glass tubes. Send the sample to a certified lab for analysis of volatile organic compounds or additional organic tests depending on the organic contaminants of concern. Additionally, if the chemist determines that the on-site organics treatment, which includes chemical oxidation and GAC adsorption, is known to remove the contaminants of concern, bench scale testing of the organics treatment may be waived in favor of using the known removal efficiency of the GAC system for specific chemicals to determine suitable treatment.

If the organic constituent concentrations have been decreased by acceptable amounts as determined by the certified lab analysis and chemist, the wastewater will be deemed treatable. If the organic constituent concentrations are still too high, treat the wastewater sample as described in 3.2.1.1 until a combination of oxidation and carbon treatment is found that is successful.

2.5.3 Oily Wastewater

In a small container, invert the oily wastewater sample a few times and allow the sample to sit for a few minutes. Visually assess the sample for a visible separation of oil and water and then conduct the following steps:

- If there is clear separation of the oil from the water, and there is no reason to suspect emulsions, or the need to remove metals or other contaminants from the sample, the oily sample is acceptable.
- If there is no separation, or poor/slow separation, it can be assumed that there are emulsions keeping the oil suspended and the following steps will be conducted:
 - Take a sample of the oily wastewater and add it to a beaker. To attempt to break the emulsion there are multiple options the chemist can attempt:
 - Adjust the pH; depending on the emulsion pH may need to be adjusted up or down. This can destabilize the emulsion and help achieve better separation.
 - The addition of the appropriate polymer can act to agglomerate oil particles, allowing them to separate out from the water.
 - Attempt addition of other available water treatment chemicals to preferentially sorb to surfactants that may be stabilizing the emulsion.
 - Once a method is found to separate oil from the water, the wastewater can be deemed acceptable for treatment.
- If the oily wastewater is known to contain metals as well as oil, and requires additional treatment, once separation is achieved, remove the top layer of oil and proceed to the bench testing procedure described for metals in 2.4.1.



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2.5.4 Wastewater Meeting Effluent Limits

For wastewaters that arrive at the facility that fall under the classification of a wastewater for a centralized waste facility, but are also received below the effluent guidelines for the facility, the wastewater will be further evaluated upon arrival at the facility. Wastewaters are nevertheless screened for organics content, metals, and visually for oils before deciding on appropriate treatment, if any.





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3.1 DESCRIPTION AND GENERAL OPERATION OF TREATMENT SYSTEM

The following discussion is intended to provide the operator functional information regarding the unit processes within the treatment system. Once a wastewater stream has been accepted, categorized, and tested for treatability by the chemist, refer to the section or sections that apply to treatment of that wastewater stream.

3.2 Common Treatment Procedures

Certain system processes and equipment will be operated the same regardless of the wastewater stream being processed. These processes are described in the following sections.

3.2.1 Pre-Startup Activities

Startup of the system and equipment should only occur after preliminary inspections have been conducted, followed by pre-startup procedures:

- The operator will verify that chemical storage tanks and totes contain adequate volumes of the required chemicals, and that polymer solutions are available.
- The operator will review records from the last operational shift to determine the status of the system and any operational issues.
- The operator or chemist will verify the calibration of the pH probes or other lab equipment prior to any bench-scale or batch treatments processes begin.

3.2.2 Chemical Feed

Process chemicals will be dosed directly from separate chemical day tanks, and may need preparation before they can be fed into process tanks. These processes are described below.

3.2.2.1 Chemical Preparation

Chemical preparation at the facility is minimal, as acid and base are dosed as received from the supplier, and treatment chemicals will be diluted in storage tanks to the desired concentration. Each day, during pre-startup inspections, the operator will evaluate that the chemical dosing tanks have an adequate volume of chemical to treat the day's wastewater.

The polymer solution may require preparation if it arrives in powder form. The technician will add the required mass of solid powder to the desired volume of water in the chemical dosing tank. The polymer solution may be a proprietary blend; see the manufacturer's specifications for the specific ratio

of water to powder. Polymer solutions should be added to the process from tanks or containers that are continually mixed with a low shear mixer to keep in condition for accurate dosing and effectiveness.

3.2.2.2 Chemical Process Control

The liquid chemical addition system onsite uses variable speed, electric metering pumps. The operator must manually turn the appropriate metering pump on at the appropriate flow rate and for the appropriate amount of time as determined by the bench-scale testing.

For chemical additions that will be determined by pH, the operator will lower a pH probe into the tank if there is no pH probe currently in the tank. The operator will then meter in sulfuric acid or sodium hydroxide until the appropriate pH is obtained as determined by discharge limits and bench-scale testing.

3.2.3 Transfer Pumping

Wastewater is gravity drained into the designated discharge pipe network and then pumped into the holding tanks via the use of a centrifugal pump. Operating sequences for the most common transfers are described in the following sections.

3.2.3.1 Transfer from Unloading Tanks to Holding Tanks

The operator will decide into which holding tank wastewater will be delivered based on the wastewater's classification type. The tanker trucks will be connected to the appropriate discharge pipe network via a cam-lock connection. The operator will align valves such that the wastewater flows to the appropriate tank without mixing waste types or dissimilar loads. Transfers should be attended continuously while pump are in operation and receiving tank levels observed to prevent overfill or running the pump dry. Multiple tanks may be filled simultaneously, also with constant operator attention.

Exterior storage tanks will be used in the designated storage area (see Appendix D) as needed and water will be transferred to the appropriate storage tanks via hosing and pumps or via vacuum trucks.

3.2.3.2 Transfer of Solids from Process Tanks to Solids Storage

Solids will be produced from four on-site treatment processes, which include a shaker unit, the GEM system, and centrifuges and clarifiers throughout the treatment system. The shaker unit removes solids through the use of a vibrating, porous conveyor belt. As solids-containing wastewater is pumped though the shaker unit, the solids are conveyed to a solids storage container. The centrifuges are operated at a frequency based on operator experience and the operations manual of the centrifuges.

The solids that separate in the centrifuge are conveyed via auger to a solids storage container, or directly transferred to the solidification pit.

Other solids-bearing wastewater will be pumped through designated clarifiers. Solids will accumulate at the bottom of the clarifier, and be removed, either by a dedicated sludge pump or an auger system within the clarifier. The sludge will be pumped to a solids storage container or processed through the shaker or centrifuge depending on solids content, at the operators' discretion.

The RI-NU facility is equipped with a solidification area. Solids from the solids storage containers can be transferred to this area. The operator will add clean soil, mulch, or another suitable absorbent material to ensure that there is no standing water in the solids pile. After the solidification process is complete, the solids can be disposed of off-site at an appropriate landfill.

3.2.3.3 Transfer from Solids Separation Back to Process Tanks

Following the dewatering of sludge, return the remaining water into the process tank for any necessary treatment prior to discharge. The process return water will be treated as an influent wastewater stream.

3.2.4 Solids Separation

Solids collected from process tanks are pumped from the bottom of the tanks into the sludge dewatering tanks. The sludge dewatering tanks are equipped with multiple drain ports along the entire length of the tank, so that as additional compaction of the sludge occurs in the tank, supernatant fluid can be drawn off at a point above the sludge to aid in dewatering.

3.2.5 Neutralization

Treated water from all waste streams that falls outside of the allowable pH discharge limits will be routed into a neutralization tank following the necessary pretreatment steps. The neutralization tank will be equipped with agitation so that pH adjustments can be made more efficiently.

3.2.6 Filtration

All wastewaters that are treated onsite, will proceed through a series of filters prior to discharge. After clarification, the water will be processed through a sand filter. After the pH of wastewater is neutralized, water is transferred through holding tanks at the GEM system (allowing for solids settling) and through bag filters to remove any fines remaining in the water, before passing through organo-clay media for oil removal (as needed), and activated carbon for organics removal.



3.2.7 Sample Tank to Discharge

Wastewater will automatically flow into an accessible top sample tank after filtration that overflows to the shipping pit.

3.3 Unit Operations for Metals Precipitation

For all wastewaters that have been evaluated and found to be able to be processed in the full-scale system for metals removal, the operator will follow the treatment operations as described below.

3.3.1 Influent Routing

Wastewater which is characteristically only metals bearing is unloaded from trucks pumped directly to storage or process tanks for subsequent metals precipitation. If a waste is a mixture of solids or oily phase materials, pretreatment is needed as described below.

3.3.2 Treatment

All wastewater is to be treated as batches, meaning that water will be pumped into a process tank and then chemicals will be dosed so that, precipitation, flocculation, and clarification can occur in the tank. The operator will dose chemicals based on scaled up dosages determined during bench scale testing.

3.3.2.1 Hydroxide Precipitation

Caustic is metered into the process to achieve the target pH provided by the chemist, as determined during bench scale testing.

For the neutralization process to be effective the pH within the tank must be measured accurately. Accurate control can only be achieved if the pH probe is calibrated properly. It is **STRONGLY RECOMMENDED** that the calibration of the pH probe in this process be verified on a **DAILY BASIS** and re-calibrated if necessary. The pH probe will be dual-point calibrated using 7.0 and 10.0 standard unit solution. Samples will be drawn off during batch treatment from the process tanks to ensure that pH is in optimal treatment ranges prior to proceeding to subsequent steps.

3.3.2.2 Coagulation and Flocculation

The coagulation and flocculation occurs in the same process tank and occurs in conjunction with metal hydroxide precipitation. Depending on operator experience and bench scale testing either ferric chloride or aluminum sulfate will be added to wastewater as a coagulant. Following the addition of coagulant, flocculant polymer is added to the process tank. The polymer is purchased in dry form. The operators prepare batches of solution polymer by mixing the dry polymer with tap water in tanks equipped with mixers. Proper control of this process requires <u>accurate</u> dosing of the polymer solution.



Overdosing causes the condition described as "pin-floc," where the water appears hazy or cloudy and very small particles are present. During overdosing, the small, neutrally buoyant particles have essentially adsorbed too much polymer and the particles are electrically repelling each other. This will result in high metal concentrations in the settler effluent, likely above the discharge limits. Subject to confirmation by the chemist, treatment may be improved in such a batch by processing through the GEM system.

Underdosing results in inadequate flocculation, leading to increased turbidity in the settler effluent. Underdosing is best verified by visually observing the characteristics of the floc formed in the flocculation tank. During underdosing, the floc will not form properly and the water will appear similar in color and clarity to the water in the neutralization tank.

Underdosing can also be caused by inadequate coagulation due to improper coagulant dosage or due to a high loading of negatively charged materials in the system (alkaline cleaner, oil and grease, etc.). If this condition is observed, the operator should first determine if the coagulants are being added in the proper amounts prior to adjusting the polymer dosage.

Because the dosage of polymer is critical, preparation of a consistent batch of polymer solution from the concentrated emulsion and water is critical. The operators must prepare a consistent batch of flocculant polymer every time a batch is prepared.

3.3.2.3 Settling

Precipitated, agglomerated, and flocculated metal solids settle out of the wastewater in this process by gravity. The settled solids are collected in the cone at the bottom of the process tank, or through separation via a clarifier. The waste metal solids concentrated at the bottom of the tank or clarifier (termed "sludge") are to be pumped to the centrifuge for solids separation. Clarified, treated wastewater effluent that should contain a minimal quantity of residual metal solids remains in the tank for subsequent discharge.

Sludge removal from a process tank is controlled by operator observation; the operator must visually monitor the characteristics of material that is being removed from the batch tank. For example, if a significant amount of the liquid appears to be clear water, the operator should discontinue pumping sludge. The operator should attempt to balance the pumping such that the sludge is removed during each process, while removing the minimal amount of treated effluent.

The settled effluent should be routinely monitored by the operator for clarity during their shift.

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3.2.3 Batch Discharge

Following treatment of the metals wastewater and solids are separated from the treated water, the treated water will be sent through the remaining treatment processes (Sections 3.1.5, 3.1.6, and 3.1.7). Water will travel through filtration and carbon before ultimately traveling through the sampling tank and into the shipping pit.

Compliance forms maintained at the facility will be used during treatment and batch discharge and will record, at a minimum, the treatment tanks/processes utilized, the type of CWT waste being treated, identification of the source (name of generator and origin process of waste), profile number, manifest number(s), expected pollutants and concentrations requiring treatment, the treated pollutants with pre- and post-concentrations, the treatment methodologies utilized, date and time of discharge, volume of wastewater treated and discharged, pH of discharged wastewater, and treatment/discharging operator(s).

3.3 Unit Operations for Organics Treatment

For all wastewaters that have been evaluated and found to be able to be processed in the full-scale system for organics removal, the operator will follow the treatment operations as described below.

3.3.1 Influent Routing

Wastewater is first unloaded from trucks and pumped to appropriate storage or process tanks. Dissimilar batches must be kept separate for treatment through the process. If an organic waste stream also is high solids content such as oil field produced water, the receiving tank is mixed and the batch is first processed through the shaker/centrifuge system. If there is an oily phase the liquid (or liquid fraction) is first pumped through the oil/water separator before further processing.

3.3.2 Chemical Oxidation

Wastewater with greater organic compound loading, or with compounds that are inefficiently treated by carbon will undergo chemical oxidation to adjust the treatment of organics. Chemical oxidant will be dosed as determined by the staff chemist for ideal removal performance. Oxidants will be fed by chemical feed pumps. Following the addition of chemical oxidants, the tank will be allowed to mix for an appropriate length of time to treat the organics as determined by the staff chemist.

3.3.3 Sorption

Following chemical oxidation, water will be pumped into an unloading sump where it will be pH adjusted as necessary before undergoing filtration and treatment via activated carbon. Refer to Section 3.2 for wastewater that also contains metals and treat the wastewater as described, after performing



oxidation of organics.

3.3.4 Batch Discharge

Following treatment by chemical oxidation, or any secondary treatment, wastewater will be sent through the remaining treatment processes of filtration and carbon for the last stages of organics treatment (Sections 3.1.5, 3.1.6, and 3.1.7). Wastewater will ultimately travel through the sampling tank and surge tank and into the sewer. Compliance forms maintained at the facility will be used during treatment and batch discharge and will record, at a minimum, the treatment tanks/processes utilized, the type of CWT waste being treated, identification of the source (name of generator and origin process of waste), profile number, manifest number(s), expected pollutants and concentrations requiring treatment, the treated pollutants with pre- and post-concentrations, the treatment methodologies utilized, date and time of discharge, volume of wastewater treated and discharged, pH of discharged wastewater, and treatment/discharging operator(s).

3.4 Unit Operations for Oily Wastewater

For all wastewater that has been evaluated and found to be able to be processed in the full-scale system for oils removal, the operator will follow the treatment operations as described below.

3.4.1 Influent

Wastewater is unloaded from trucks holding tanks. Prior to accepting wastewater into the treatment system, the staff chemist will need to evaluate the wastewater to determine if the oils are emulsified or not.

3.4.2 Treatment

Immiscible oil/water mixtures treatment consists gravity separation, with gross separation possibly in a non-agitated tank (decanting) followed by pumping through the oil/water separator. This step applies to both oil/water mixtures as received, or emulsions treated as follows:

3.4.2.1 Emulsified Oils

In the instance that an oily wastewater is highly emulsified, and the oil will not separate out by gravity separation alone, the chemist will recommend to operators to treat the oily wastewater in the oil process tank. In this tank the operator can adjust pH as needed, or feed a variety of polymers or possibly salts, to break the emulsion and achieve phase separation. Any solids from the process can be removed from the bottom of the tank and pumped into sludge holding. Treated oily wastewater, once the emulsion is broken, will then proceed through separation and further processing.



3.4.2.2 Non-emulsified Oils

Wastewaters arriving onsite without emulsions, or wastewaters that have been treated to break emulsions are processed through the oil/water separator. Following the oil separation, wastewater will undergo filtration (clarification and sand filtration), and further processing as needed.

3.4.3 Batch Discharge

Following oil separation, wastewater will be sent through the remaining treatment processes of neutralization, filtration, and carbon (Sections 3.1.5, 3.1.6, and 3.1.7). After all the treatment steps, wastewater will ultimately travel through the sampling tank and into the shipping pit.

Compliance forms maintained at the facility will be used during treatment and batch discharge and will record, at a minimum, the treatment tanks/processes utilized, the type of CWT waste being treated, identification of the source (name of generator and origin process of waste), profile number, manifest number(s), expected pollutants and concentrations requiring treatment, the treated pollutants with preand post-concentrations, the treatment methodologies utilized, date and time of discharge, volume of wastewater treated and discharged, pH of discharged wastewater, and treatment/discharging operator(s).

3.5 Wastewaters Meeting Effluent Guidelines

For all wastewaters that have been evaluated and found to be able to be processed in the full-scale system for metals removal, the operator will follow the treatment operations as described below.

3.5.1 Influent

Once wastewater is accepted to the facility (see Section 2.3), wastewater is unloaded from trucks to tanks dedicated to wastestreams not requiring treatment.

3.5.2 Batch Evaluation and Discharge

Upon receiving wastewater that is suspected of meeting effluent requirements, it will be for the chemist to confirm that wastewater matches its profile through screening analysis, as needed. Once wastewater is found to be acceptable, it can be pumped separately to the sample tank and shipping pit.

Compliance forms maintained at the facility will be used during treatment and batch discharge and will record, at a minimum, the treatment tanks/processes utilized, the type of CWT waste being treated, identification of the source (name of generator and origin process of waste), profile number, manifest number(s), expected pollutants and concentrations requiring treatment, the treated pollutants with pre-



and post-concentrations, the treatment methodologies utilized, date and time of discharge, volume of wastewater treated and discharged, pH of discharged wastewater, and treatment/discharging operator(s).

3.6 Operation of Bag Filters, Treated Oil Media Filter, and Activated Carbon.

Standard operation of all filtration media requires that influent and effluent valves to the media be open to allow flow to travel through the system. Operators will check housing of all media daily, and observe pressure drop over the media to determine when change outs are necessary. Descriptions of change-out criteria and procedures are included below. All waste types requiring treatment will be run through the bag filters, treated oil media filters, and activated carbon. This will ensure removal of any residual solids, residual oil, and residual organics prior to discharge.

3.6.1 Bag Filter Change-out Procedure

Bag filters will need to be changed-out whenever the pressure drop across the filter begins to exceed 15 psig, or the appropriate pressure drop set at the control panel. The process flow will normally be shut off for a few minutes to shift valves from primary to secondary vessels and allow the full/spent bags to be replaced. The process for changing bag filters is generally described below:

- Confirm the influent and effluent valves to the filters are closed, and no process flows are being directed to the filters.
- Slowly open the drain valve to relieve pressure in the filters, and allow filter housing to drain.
- Remove the cover to access filter basket housing, and remove the filter bag to dispose.
- Clean out filter housing of any debris, and confirm sealing surfaces and o-rings are intact.
- Install a clean filter basket and filter bag and replace the cover.
- Slowly open the influent and effluent valves to reintroduce flow to bag filters.

3.6.2 Carbon and Oil Filter Change-out Procedure

Carbon vessels will need to be operated in a lead and lag configuration to obtain optimal removal efficiency of organics. This configuration also allows for monitoring of organics removal efficiency, while minimizing risk of releasing organics. TOC will be monitored in effluent from the leading carbon vessel, once breakthrough is 70% of influent TOC, the carbon in the lead vessel will need to be replaced. TOC will be analyzed either by an offsite certified laboratory that can accommodate a rapid turnaround, or via the onsite HACH DR3900 spectrophotometer and associated test kits. After replacing

the carbon, the previous lag vessel will become the lead, and the vessel with fresh carbon will become the lag vessel. The criteria for determining when organo-clay media needs to be replaced will be when pressure drop alarms signify loss of pressure through the media, alarms will be set at manufacturer recommended values.

The process for changing the media is as described below:

- Confirm the influent and effluent valves to the carbon cartridges are closed, and no process flows are being directed to the carbon.
- Drain any liquids in the lead vessel, remove any spent carbon, and place into a container that can also prevent any seepage.
- Rinse the unit and close any valves leaving the lead unit.
- Add water to a level above the screen in the carbon unit to cushion the addition of carbon into the unit, add fresh carbon to the lead unit.
- Hydrate carbon with clean water, secure the unit by closing the lid, and let sit for 12-24 hours.
- Rearrange the valves to set the carbon unit with fresh carbon as the secondary (or lag) unit. Adjust labels on tanks to clearly indicate LEAD/LAG vessels.
- Adjust sample ports so that influent, mid, and effluent sample locations correspond to the new lead/lag configurations.
- Follow the manufacturer's instructions for conditioning and preparation of a fresh adsorption vessel. For example, fill GAC vessels with water; allow to sit overnight and prior to restart of the system, back flush to bleed off any trapped air within the carbon units.

3.7 Non-CWT Wastewaters

Domestic wastewater (i.e. sewage) is received and processed batch-wise through a screening operation, a centrifuge, and a clarifier to remove excess settable solids and discharged via a dedicated sampling tank to the shipping pit.



4.1 PERSONNEL

4.2 Operational and Managerial Responsibilities

The wastewater treatment facility for which this manual has been prepared has been designed to treat the waste load it is expected to receive.

To ensure efficient and economical wastewater treatment system operation, it is necessary to have an onsite supervisor, a chemist, and wastewater operators.

The primary responsibility of the onsite staff is to maintain at all times a quality effluent from the wastewater treatment plant that is in compliance with the permit discharge requirements.

Following is a list of several responsibilities that shall pertain to the onsite supervisor, chemist, and operators (together referred to as the "team") responsible for managing and operating the wastewater system.

- The team shall maintain a safe working environment,
- The team shall maintain a high-quality plant effluent within permitted discharge limits.
- The team shall maintain efficient plant operation and maintenance.
- The team shall maintain adequate treatment system operational and management records.
- The onsite supervisor shall define operator requirements, prepare job descriptions, develop organizational charts, and schedule personnel.
- The onsite supervisor will provide good working conditions, safety equipment, and proper tools for the operational personnel.
- Operations personnel will participate in necessary training programs.
- The onsite supervisor will motivate operators to achieve maximum efficiency of operation.
- The onsite supervisor will make operations personnel aware of importance of proper and efficient plant performance.



- Facility staff will conduct periodic inspections of the treatment system to discuss operational issues.
- The team will maintain good public relations, in particular with the ODPW representatives.
- Facility management, in conjunction with RI-NU management shall prepare budgets and necessary reports.
- The team shall plan for future facility needs.

4.3 Manpower Requirements/Staff

Good operation and maintenance in conjunction with properly working equipment is the major factor in the treatment efficiency of any facility. Without the proper operator attention, even a well-designed treatment facility will not produce the effluent limits it is designed to meet.

Please note the following discussion regarding personnel and staffing is a recommendation based on current conditions. Based on the capacity of the treatment system and the historical requirement for continuous operation, it is anticipated that between four and five full time onsite employees including the chemist, and the supervisor are required for adequate plant staffing during each shift. This staffing level is directly related to the volume of wastewater being accepted onsite. During times of maximum use, as many as three operators may be necessary during each shift to effectively monitor and operate the plant. During periods of reduced wastewater flows, the treatment system may be operated with fewer personnel, assuming that the all treatment systems components and controls are operational.

It is of utmost importance that the operators and maintenance personnel receive up-to-date training in the proper functioning of the wastewater treatment facility. The purpose is to protect the plant equipment and to improve the quality of the effluent.

4.4 Job Description and Qualifications

Listed below is a recommended job description and qualification profile for each of the suggested positions at the treatment plant. Note that a qualified Wastewater Treatment Operator is required at the facility at all times wastewater is being processed at the facility.



Onsite Supervisor

The onsite supervisor serves as the day-to-day operations manager for the plant and also as the lead operator. The success of the plant depends on the ability of the onsite supervisor to recognize problems and communicate them to the project manager.

The onsite supervisor is responsible for ensuring the efficient and economic operation of the treatment plant. The onsite supervisor should provide engineering and technical support for the treatment system and to the operators. The project manager should provide the supervisor and operators with training on the proper function of the wastewater treatment facility. It is recommended that all process decisions have the approval of RI-NU management.

It is the site supervisor's role to analyze the day-to-day data collected by the operators and use this data to determine when a process is not operating efficiently and make recommendations for continuous improvement. The onsite supervisor should work closely with the operators in preparing reports, summaries, and other required written documents.

The site supervisor will, in conjunction with the operators, track the performance of the plant and work closely with the onsite supervisor in a support role.

The <u>utmost priority</u> of the supervisor is to ensure a safe working environment for the operators and any other personnel in the wastewater treatment area. Under no circumstance should the supervisor allow any unsafe practices and procedures to occur at the treatment plant. When dealing with hazardous materials and chemicals, **SAFETY MUST ALWAYS COME FIRST.** The main operational priorities of the onsite supervisor are as follows:

- Ensure that all treated wastewater released to the sewer system is in compliance with the permitted discharge limits. Under **NO CIRCUMSTANCE** will any treated wastewater that is out of compliance be discharged to the shipping pit. Additionally, the supervisor must also make certain that no prohibited discharges are released to the shipping pit.
- Ensure that the wastewater treatment plant is staffed with the appropriate personnel at all times, as necessary to meet the production schedule of the plant.
- Operate the treatment plant as economically and efficiently as possible.
- Maintain adequate supplies and chemicals available for the plant to operate effectively.



In addition to these priorities, the supervisor has general day-to-day duties that consist of management of the operators and the entire operation. Specific job duties can be expected to include the following:

- Control and manage the operation of the treatment plant
- Hands-on training of the operators
- Preparation of shift schedule for the operators
- Enforcement of plant rules and procedures
- Interact with the production and management personnel on a daily basis
- Work with project manager to continuously improve the plant operation
- Maintain shift log and plant operating records
- Prepare status reports
- Maintain facility records

In addition to the onsite managerial duties, the supervisor also serves as an operator and will be expected to perform typical operation functions including but not limited to:

- Operate the treatment facility to control the flow and processing of wastewater, sludge, and effluent
- Monitor gauges, meters, and control panels
- Observe variations in operating conditions and interprets readings and test results to determine treatment requirements
- Operate all wastewater treatment equipment
- Collect samples and perform internal laboratory tests and analyses
- Perform routine maintenance functions and custodial duties

Recommended Onsite Supervisor Qualifications Profile

- Formal Education
 - Minimum of a high school graduate or equivalent training and experience.
- General Requirements
 - Knowledge of processes and equipment involved in wastewater treatment.



- Ability to maintain and evaluate records.
- Ability to perform all required duties.
- Ability to maintain working relationship with other operators and production workers.
- General Educational Development
 - Reasoning
 - Apply knowledge of wastewater treatment to solve practical problems.
 - Interpret a variety of written and oral instructions.
 - Mathematical
 - Perform ordinary arithmetical and algebraic procedures in standard, practical applications.
 - Language
 - Establish and maintain communications with superiors and co-workers.
 - Ability to comprehend oral and written instructions, record information, and request supplies and work-materials orally or in writing.
- Specific Vocational Preparation
 - Minimum of 3 to 12 months experience working at an industrial wastewater treatment plant, depending upon formal training and prior experience.
 - Preferred post-high school education in a vocational or scientific discipline.
- Temperament
 - Supervisor must adjust to a variety of situations and conditions and maintain an even temperament. The supervisor must maintain a positive attitude and exercise calm and reasonable judgment when working with the operators, production personnel, or others.
- Physical Demands
 - Anticipated medium to heavy-duty work, involving climbing, balancing, stooping, kneeling, crouching, reaching, handling, talking, hearing, visual acuity, depth perception, and color vision.
- Working Conditions
 - Operations are conducted both indoors and outdoors. Exposure to weather, fumes, odors, and dust. Potential for exposure to hazardous chemicals or toxic conditions.

ENS/JFE

Wastewater Treatment Plant Operator

The wastewater treatment plant operator at the facility is expected to be a qualified and competent employee. It is necessary for the operator to also interact with production personnel and perform many functions of the supervisor, when not present. The operator may be required to perform any combination of the following tasks pertinent to controlling operation of plant or performs various tasks as directed.

- Operate treatment facilities to control flow and processing of wastewater, sludge, and effluent.
- Monitor gauges, meters, and control panels.
- Observe variations in operating conditions and interprets meter and gauge readings and test results to determine processing requirements.
- Maintain shift log and daily log and records meter and gauge readings.
- Collect samples and performs routine laboratory tests and analyses.
- Perform routine maintenance functions and custodial duties.
- Assist maintenance mechanic/laborer in any combination of the following tasks pertinent to maintenance of the plant:
 - Performs preventive maintenance and minor repairs on mechanical machinery and equipment.
 - Maintains building structures and grounds.
 - Maintenance tasks, such as, lubricate equipment and check for malfunctions; replace pumps or valves; and replace minor repair parts in motors, pumps, and other equipment. Clean out pipes and perform other minor plumbing and pipe-fitting tasks as required.
 - Assist in keeping maintenance records.
 - Perform minor maintenance and minor repair tasks on buildings, structures, and grounds.



- Collect and dispose of trash.

Qualifications Profile

- Formal Education
 - B.S. degree in Chemical Engineering or Environmental Engineering; or,
 - B.S. degree in any other Engineering or Science, preferably with strong background in Chemistry, industrial wastewater treatment processes, and process control; or,
 - A.A. degree in Science with strong background in Chemistry (at least two semesters of General Chemistry) and at least two years of experience in industrial wastewater treatment; or,
 - Industrial Wastewater Treatment Operator Certificate from the California Water Environment Association (CWEA). CWEA offers certification programs for industrial waste treatment plant operators ranging from Grade I to Grade IV; a Grade I certificate is the minimum requirement.
- General Requirements
 - Ability to operate plant processes and equipment.
 - Ability to maintain and evaluate facility logs/records.
 - Ability to collect samples for laboratory analysis and interpret results.
 - Ability to maintain working relationship with other shift workers.
- General Educational Development
 - Reasoning: Apply common sense understanding to carry out written, oral, or diagrammatic instructions. Deal with problems involving concrete variables in or from standardized situations.
 - Mathematical: Perform ordinary arithmetical calculations.
 - Language: Ability to comprehend oral and written instructions, record information, and request supplies and work materials orally or in writing.
- Specific Vocational Preparation
 - On-the-job training from date of employment. Previous experience as laborer or equipment operator in wastewater treatment plant also desirable.



- Temperament
 - Operator must adjust to a variety of situations and conditions and maintain an even temperament. The operator must maintain a positive attitude and exercise calm and reasonable judgment when working with the production personnel or others.
- Working Conditions
 - Operations are conducted both indoors and outdoors. Exposure to weather, fumes, odors, and dust. Potential for exposure to hazardous chemicals or toxic conditions.

Note that a qualified Wastewater Treatment Operator is required at the facility at all times wastewater is being processed at the facility.

Facility Chemist

The Facility Chemist is expected to be a qualified and competent employee. The chemist may be required to perform any combination of the following tasks pertinent to plant operations or performs various tasks as directed.

- Evaluate influent waste streams and manifests.
- Perform bench scale testing on influent wastes to assess treatability, and scale up chemical dosing for operators to perform full-scale treatment.
- Operation and maintenance of all analytical equipment, including, but not limited to ICP, pH probes, and flow meters.
- Maintain shift log and daily log and records meter and gauge readings.
- Collect samples and performs routine laboratory tests and analyses.
- Perform routine maintenance functions and custodial duties within onsite laboratory space.

Qualifications Profile

- Formal Education
 - College education in technical field or chemistry preferred.
- General Requirements
 - Ability to learn operation of plant processes and equipment.



- Ability to learn basic treatment mechanics for metal precipitation.
- Ability to maintain and evaluate simple records.
- Ability to maintain working relationship with other shift workers.
- General Educational Development
 - Reasoning: Apply common sense understanding to carry out written, oral, or diagrammatic instructions. Deal with problems involving concrete variables in or from standardized situations. Able to apply understanding of metals precipitation to develop testing regimes to treat influent wastewaters.
 - Mathematical: Perform ordinary arithmetical calculations, and able to scale up chemical dosages based on bench tests.
 - Language: Ability to comprehend oral and written instructions, record information, and request supplies and work materials orally or in writing.
- Specific Vocational Preparation
 - On-the-job training from date of employment. Previous experience as chemist or laboratory technician in wastewater treatment plant also desirable.
 - Ability to run and maintain analytical instruments.
- Temperament
 - Chemist must adjust to a variety of situations and conditions and maintain an even temperament. The chemist must maintain a positive attitude and exercise calm and reasonable judgment when working with the production personnel or others.

5.1 SAFETY

5.2 General

The potential safety and health hazards associated with industrial wastewater treatment systems are many and varied. Some of the hazards to which industrial wastewater treatment operators may be exposed include the following:

- Electrical hazards
- Trip/fall hazards
- Chemical exposure
- Confined space hazards
- Explosion and Fire
- Mechanical hazards (e.g., pinch/crush)
- Miscellaneous hazards

Operations personnel should be aware of all potential hazards that exist in their workplace and should be protected — and protect themselves — from these hazards to the greatest extent possible.

The operators should be aware that **injury frequency rates** for wastewater treatment facility employees are **substantially higher** than those for workers in most other industries. Injuries create human suffering and loss of human resources. In addition, they have a deleterious impact on plant efficiency, employee morale, public relations, and profitability.

Effective management and operation of a wastewater facility requires that all aspects of the operation, including the practice of safety, be at the highest level possible. Safety is initiated by the proper attitude of management toward accident prevention. This attitude will be reflected in the supervisory force and the workers. A safety program must have continuously demonstrated interest and commitment on the part of management if employee participation and cooperation are to be obtained.

5.3 Electrical Safety

Most equipment in a wastewater plant uses electricity as the power source. Working with the equipment requires exposure to electrical hazards that may result in electrocution unless safe practices are strictly followed.

The following list of general safety practices should be considered as a start in establishing complete electrical safety rules and procedures at the wastewater plant:

- Allow only qualified and authorized personnel to work on electrical equipment and wiring or to perform electrical maintenance.
- Utilize lockout/tagout procedures when servicing electrical equipment.
- Electrical equipment and lines will always be considered as energized unless they are positively proven to be de-energized and properly grounded. If it is not grounded, it is not dead.
- The use of metal ladders or metal tape measures around electrical equipment will be avoided.
- Two employees will work as a team on energized equipment.
- Approved rubber gloves will be used when working with voltages above 300 volts.
- An electrical control panel will never be opened unless the job requires it.
- Before work is performed on a line or buss that operates at 440 volts or above, it will be de-energized, locked out, and grounded in an approved manner.
- No part of the body will be used to test a circuit.
- Personnel will avoid grounding themselves in water or on pipes, drains, or metal objects when working on electrical equipment or wiring.
- No electrical safety device will be made inoperative or bypassed.
- When working in close quarters, all energized circuits will be covered with insulating blankets.
- All tools will have insulated handles.
- Metal-cased flashlights will never be used.
- Jewelry will not be worn when working with or near electric circuitry.



- All electric tools will be grounded and/or double insulated.
- Rubber mats will be used at control centers and electrical panels.
- All electric motors, switches, and control boxes will be kept clean at all times.
- Floors and working surfaces will be kept dry to the extent practicable.

Typically, wastewater treatment personnel are not qualified to — and thus should not — perform electrical work. However, it is the responsibility of wastewater operations personnel to ensure that safety rules and practices are adhered to by personnel conducting electrical work in the wastewater treatment area, and to report any apparent unsafe situation or practice to the appropriate RI-NU personnel and the facility manager.

In the event of an electrical accident, the employee(s) discovering the accident will assess the situation and develop a course of action. The course of action should include the following steps/considerations:

- Do not rush up to and touch the victim. This may result in electrocution of the rescuer if the victim is still in contact with the electrical source.
- Determine the cause (an electric tool, power line, or piece of equipment) of shock, that is, the source of electricity:
 - If the cause is a tool or piece of equipment with a switch or circuit breaker, turn the switch or breaker to the off position.
 - If the cause has no switch or circuit breaker, try to remove the cause from the victim by using a non-conductor such as a wooden stick or a rope.
 - If the cause cannot be switched off or too large to be moved, try to move the victim away from the cause. Remember not to touch the victim directly. Again, use a non-conductor such as wood, rope, or plastic to push, pull, or lift the victim from the source of electricity.

If an electrical accident occurs in the wastewater treatment area, the operator (or his designate) will immediately notify the appropriate RI-NU personnel and the supervisor.

5.4 Trip/Fall Hazards

The wastewater treatment area presents potential trip/fall hazards in the form of ladders, elevated crosswalks/mezzanines, stairs and cords, hoses or other obstacles on walking surfaces.

To minimize trip/fall hazards, the following practices and procedures will be followed:

- Maintain aisles, passageways, and walkways clear of obstructions
- Clean up materials spilled onto walkways immediately
- Maintain covers and/or guarding over all pits and floor openings
- Ensure that guardrails and stair rails are adequately maintained
- Maintain all ladders in good condition, and free of grease and oil
- Do not use the top step of a ladder as a step
- Exercise particular caution when ascending or descending stairs or ladders, and/or when working on elevated surfaces

5.5 Chemical Exposure

The potential for exposure to hazardous chemicals exists when working with untreated wastewater and chemicals used for treatment. To minimize the risk of chemical exposure, the following general practices/procedures should be followed:

- Utilize safe practices and appropriate personal protective equipment when transferring or otherwise handling hazardous chemicals (e.g., acids, caustics).
- Maintain awareness of the potential hazards associated with chemicals in the wastewater treatment area read the safety data sheets (SDSs). (SDSs for the chemicals reasonably anticipated to be encountered in the wastewater treatment area are included in Appendix E).
- Ensure that the eyewash stations in the wastewater treatment area are functional and that access to them is unobstructed.
- Maintain clear hazard labels/markings on all containers of hazardous chemicals (e.g., drums, vats, tanks).
- Do not eat, drink or smoke in the wastewater treatment area, and utilize appropriate personal hygiene (e.g., wash hands) before doing so.



- Store hazardous chemicals in closed containers when they are not in use.
- Maintain spill response/cleanup materials in a readily accessible location(s), and utilize appropriate procedures (see below) when cleaning up releases of hazardous chemicals.
- Utilize vacuuming (as opposed to sweeping or blowing) as a means of cleaning up dust whenever possible.
- Maintain descriptive labels/markings on chemical piping systems, and that these systems are maintained free of leaks or drips.
- If a chemical exposure-related accident occurs in the wastewater treatment area, the operator will immediately notify the appropriate RI-NU personnel and the supervisor. The facility is designed such that there is adequate retention on the site so a release will not occur. In the event of a spill or release of a hazardous chemical, follow the procedure outlined in the diagram. In the event of a spill:
 - Determine what has been released, and estimate how much.
 - If there appears to be a threat of fire, explosion or personal injury, evacuate the area, then dial 911 and notify facility management.
 - If there does not appear to be an immediate threat, refer to the SDS for the chemical released for information regarding the appropriate personal protective equipment to be used, spill response procedures, and waste disposal considerations.
 - Contain and clean up the released chemical in accordance with the chemical-specific recommendations from the SDS.

SDSs for each chemical used can be found in Appendix E. If the operator has a specific question regarding the chemical, please refer to the SDS. If treatment chemicals are changed or updated, adjust Appendix E as necessary.



5.6 Confined Space Hazards

Confined space hazards that may be encountered in the wastewater treatment area include tanks that pose hazards associated with chemical exposure, falls, and/or engulfment (e.g., drowning). A confined space is defined by Occupational Safety and Health Administration as a space that:

- Is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous employee occupancy.

Unless properly trained and qualified, wastewater treatment plant employees are not authorized to enter into confined spaces at any time.

If a confined space entry needs to be performed, please contact the site supervisor for assistance.

5.7 Explosion and Fire Hazards

Explosion and/or fire can result from a variety of causes such as ignition (by a spark or flame) of flammable or explosive materials, ignition of materials due to oxygen enrichment, or chemical reactions that produce fire or heat. Explosions and fires can occur spontaneously, but are more often the result of some activity such as the mixing of incompatible chemicals or the inadvertent ignition of a flammable/explosive material or atmosphere.

Explosions and fires can present the following hazards: intense heat, flying debris, smoke inhalation, and/or the release of hazardous products of combustion. To minimize the potential hazards associated with fire and explosion, the following practices and procedures should be followed:

- Maintain an adequate number and type of portable fire extinguishers in readily accessible locations.
- Ensure that operators are periodically instructed in the use of extinguishers and fire protection procedures.
- Store all flammable liquids in closed containers when not in use.



- Store all combustible scrap, debris, and waste materials (e.g., oily rags) in covered metal receptacles, and remove this material from the area promptly.
- Store incompatible chemicals and materials (e.g., acids and bases, oxidizing materials), in separate, designated areas to minimize the risk of explosive reactions.
- Do not smoke in the wastewater treatment area.
- Maintain clear access to all emergency exits.
- In the event of a fire, the operator(s) discovering the fire will:
 - Pull the fire alarm.
 - If alarms are not functional for any reason, pass the word "FIRE," give the location over the phone system and notify the appropriate RI-NU personnel.
 - Locate the nearest fire extinguisher.
 - If the operator has been trained to respond, and if exposure to fumes or contact with hazardous materials can be avoided, attempt to extinguish the fire. An operator will not attempt any of these measures alone and will secure help.
 - Once the fire has been extinguished or it has been determined that the fire cannot be safety extinguished, proceed to the nearest exit, and then to the designated evacuation assembly area.

5.8 Miscellaneous Hazards

Operators in the wastewater treatment area may also be exposed to other potential hazards, including heat/cold, blood borne pathogens, cuts and abrasions, and hazards associated with lifting, etc. To minimize these potential hazards, the following practices and procedures should be followed:

- The following general safety guides will be observed whenever working around wastewater.
 - Hands and fingers will be kept from the nose, mouth, eyes, and ears.



- Rubber gloves will be worn when cleaning pumps; handling wastewater, treatment chemicals, sludge or grit; or for other work in which an employee comes into direct contact with untreated wastewater or chemicals.
- Gloves will always be worn when hands are chapped or burned or when the skin is broken for any cause. Gloves will be worn when handling wastewater and/or treatment chemicals.
- Before eating or smoking, and after work, the hands will be washed thoroughly with soap and hot water.
- Fingernails will be kept short, and foreign material will be removed from the nails.
- Fresh work clothes will not be stored with used work clothes.
- All cuts and scratches must be reported and be given first aid treatment.
- A shower should be taken after each workday.

Improper lifting can result in injury. Use proper lifting techniques, and obtain help when necessary.

- If workplace heat becomes a problem, employ appropriate work/rest regimens, and ensure that operators drink adequate fluids.
- If temperatures drop too low, exposure to water spray can induce hypothermia. Ensure operators adequately monitor temperatures, and change out of wet clothing in cold conditions.
- Observe universal precautions in the event of exposure to blood or other potentially infectious materials.

5.9 Laboratory Safety

Safety is important in the laboratory as well as in the rest of the treatment plant. Pertinent safety practices in wastewater plant laboratories are as follows:

• All chipped or cracked glassware will be discarded in a specific container marked for disposal of broken glass.



- When using volatile solvents, bases, or acids, the work will be done in a well ventilated area.
- Solvents will be stored in special explosion-proof cans.
- Acids react violently with some organic materials. When using these chemicals, care should be taken in regard to possible fire or explosion.
- Chemicals will not be handled with the bare hands.
- An emergency eyewash and shower will be located in the laboratory.
- Suction bulbs will be used on all pipettes.
- Appropriate safety equipment will be worn when working with corrosive chemicals.
- A face shield or chemical-type goggles will be used when dangerous chemicals are handled.
- All chemicals will be labeled clearly.
- Gloves will be worn when rubber-to-glass connections are to be made.
- Proper ventilation will be available to remove fumes and dust.
- Smoking and eating in the laboratory is strictly prohibited.
- Any gas cylinders will be stored properly and secured in a well-ventilated area outside the laboratory.
- Appropriate fire extinguishers will be fully charged and readily available in the laboratory.
- Personnel should thoroughly wash their hands with soap and hot water before eating or smoking.
- A container of absorbent inert material, for example, sand, will be available for use in acid or base spills.
- Remember: Always add ACID to WATER, never WATER to ACID.



5.10 Safety Equipment

In addition to the above-mentioned safety equipment for specific areas of the treatment plant, it is necessary to have access to other safety equipment. These items will be located where they are readily accessible to treatment plant personnel, including:

- First aid kits
- Fire extinguishers
- Respirators with the appropriate cartridges
- Protective clothing including gloves and chemical suits
- Face shield
- 5-minute escape bottle
- Safety glasses
- Goggles

Wastewater treatment personnel should maintain familiarity with the location(s) and the proper use and limitations of this equipment.

5.11 Emergency Contact Numbers

The telephone numbers of relevant health and safety personnel including the nearest hospital, police and fire departments, ambulance services, and rescue squad will be posted in the treatment system. The telephone number of the poison control will be readily available in the event of a chemical emergency. The telephone number of the relevant Orange County representatives, RI-NU facility personnel and management will also be posted. For convenience, several important numbers are also provided in this section.

Contact/Situation	Telephone Number
Fire Department/Fire, Explosion	911
Coast Guard National Response Center/Reportable Quantity	1-800-424-8802
Release of Hazardous Substance	
California Emergency Management Agency/Reportable	1-800-852-7550
Quantity Release of Hazardous Substance, Any Significant	911
Emergency Situation	
Hospital/Medical Emergency	TBD/911
Facility Supervisor	TBD
RI-NU Management	TBD
ODPW (Technical Services Program – Source Control, Jeremy Grant)	805-385-3965

6.1 RECORDS

6.2 General Records

Record keeping to track loads of wastewater received and processed through the facility is a vital aspect of operations. The operator record tests procedures, results, and log all processing step observation and measurements. Among other reasons, these records provide serve as a guide in regulating, adjusting, and modifying when repeat deliveries of the same and similar waste stream occur, and for continuous improvement of the plant facilities and treatment processes. Of great importance also is the establishment of a reliable continuing record of processing decisions, proof of performance, issues and corrective measures or other processing recommendations for future operations.

Operation data that is collected, analyzed, and reported will be geared to the particular needs and circumstances. The operator should be able to justify each measurement, observation, calculation, and report on the basis of expected usefulness and value. Data will be collected and tests performed that are necessary to control the treatment processes and reflect their efficiencies.

Note that the facility must maintain (obtain, generate, and keep) all documents (paper and/or electronic) related to wastewater for review during an inspection and for a **minimum of three years** in accordance with the record-keeping requirements in 40 CFR 403.12(o), and 40 CFR 437.

6.3 Daily Records

Daily records are recorded in two main forms at the plant. A continuing diary, or plant log, is kept that contains a wide variety of factual information on matters such as the general status of the plant, progress of maintenance work, equipment failure and repair, unusual or unexpected conditions or analytical results, and names and affiliations of visitors, etc.

Daily shift logs are to be prepared by the operators each shift. These logs are critical to the successful operation of the treatment plant. Important operational data will be recorded on the shift logs. A copy of sample shift log is included in Appendix F.

6.4 Operation and Maintenance Cost Records

RI-NU also tracks operating costs. The major categories of operating costs are labor, chemicals, supplies, and administration. Chemical inventory is performed on a regular basis and chemical usage tracked daily. Supplies include lab chemicals, cleaning materials, maintenance parts and fluids, and other expendable items. All costs will include information on unit costs, total costs, and amounts/quantities used, and waste disposal.



6.5 Maintenance Records

It is necessary to have readily available the equipment and maintenance force capable of keeping equipment in (or restored to) operational condition. Records of the plant will be available for use by operating personnel and will include operations and maintenance manuals as well as design data, shop drawings, equipment history, and other similar information.

6.6 Reports

6.6.1 Weekly (or Monthly) Operating Reports

Weekly (or monthly) operating reports will be prepared that contain a summary of all data collected on a routine basis. These reports are prepared to provide a snap shot summary of the operation of the plant. Flows, chemical usage, and influent loadings will be presented in the reports. The report also provides status summary of maintenance activities, problems experienced and ongoing activities. Examples of a typical status report, with other beneficial logs are provided in Appendix G.

6.6.2 Annual Operating Reports

The facility supervisor, with the assistance of the operators, will prepare a detailed annual operating report. The report is a summary of developments and activities that occurred during the previous fiscal year. It should enable RI-NU to readily determine the status of the facilities. This report should include a complete fiscal summary detailing chemical costs, maintenance costs, labor cost, project management, supplies, etc.

The report will describe the system and the treatment process and will contain flow data, performance data, chemical usage, and associated graphs. The graphs will reflect present conditions and conditions of past years. There will be a discussion and a table that summarizes flow data and operation efficiency during the past year. Process problems and the solutions will be outlined for future reference.

The maintenance section will briefly describe maintenance projects that were completed during the year. Major projects anticipated during the coming year will also be described along with the anticipated costs.

Improvements or capital additions to the treatment plant will be described, if applicable. The costs of recommended improvements will be included as well as the dates of completion.

An annual cost projection is also a necessary portion of an annual report. The projection should cover the previous year's cost, actual expenditures, and the ensuing year's budget. Expenditures of plant operation, administration, capital expenditures, debts service, and receipts and revenues should be presented. The major expenditures of operation and maintenance are labor and chemicals; therefore, these should be discussed in detail. Trends of these expenditures may be plotted and observed to assist in future planning.

6.7 Self-Monitoring Reports

The analytical methods and frequencies for completion of self-monitoring reports (SMRs) are defined in the facility's Permit. The SMRs must be sent to ODPW at dates that satisfy the deadlines set forth in the Permit. All onsite compliance paperwork and data, including sample data, lab reports, and treatment records, are to be kept on site in an office or other central location. These records must be made available during inspections. If the operator or chemist elects to take additional samples of the system effluent to be analyzed by a state-certified lab, these results must be included in the SMR to be used for calculation of monthly average effluent concentrations.

6.8 Facility Plans

The Site must provide and maintain certain facility plans as required by the permit or City of Oxnard regulations. At a minimum, these include a slug control plan and a waste analysis plan (WAP).

6.9 Personnel Records

Records that reflect such things as employee training and employee turnover rate are valuable to treatment system management. A folder will be kept on file for each employee that contains such information as the date of employment, previous employment history, education, salary increases, company contacts, etc.

6.10 Violations and Equipment Failure

After becoming aware of a violation as determined by sampling conducted by the operator, RI-NU must notify ODPW within a time specified in the Permit. RI-NU shall investigate the cause of the violation, take corrective actions to prevent the violation for recurring, and submit a report to ODPW within a time specified in the Permit.

Upon discovery of any equipment failure, accidental discharge of prohibited substances listed in Chapter 19 of the Oxnard City Code, or any slug loads or spills that may enter the Oxnard Municipal Wastewater System, RI-NU must immediately notify ODPW. The notification should



Operations and Maintenance Manual Industrial Wastewater Treatment Plant RI-NU Services, LLC; Santa Paula, California January 2017

include the nature of the event, location of discharge, date and time of discharge, concentration and volume of pollutant, and corrective actions already taken or that will be taken.



7.1 ANALYTICAL TESTING

7.2 Purpose

The management and control of any process is essential if the process is to operate efficiently and meet specific standards. To achieve these operational goals, it is necessary to have selected measurements to enable an operator to make the proper decision relative to altering the treatment for varying process conditions.

For the purposes of this operations manual, this analytical testing section will refer to samples being analyzed for regulatory purposes. These samples will be sent to a certified laboratory. However, the principles discussed in this section will also benefit any in-house sampling or monitoring used for bench marking process performance.

7.3 Sampling

Samples are to be taken at the monitoring points as specified in the Permit, and are not to be taken after the wastewater is diluted by any other waste stream, body of water, or substance. All the equipment used for sampling and analysis should be routinely calibrated, inspected, and maintained to ensure measurement accuracy. Calibration frequency of the flowmeters is defined in the Permit.

7.3.1 Sample Types

The value of results from wastewater laboratory testing is dependent upon the sample being representative of the source from which it was taken. There are two types of samples taken for wastewater laboratory analyses:

Grab Sample — A single sample taken at neither set time nor flow.

Composite Sample — A combination of individual samples taken at selected time or flow volume intervals, for a specified period to minimize the effect of the variability of the individual sample.

Samples may be of equal volume or proportional to flow at the time of sampling. Grab samples are collected at a particular instant and represent conditions existing at that single moment. Composite samples represent conditions over a longer, definite period of time.

After a representative sample has been collected, it is essential that it be maintained in a state that will not introduce error before analysis (see Sample Storage below).

Composite samples indicate the characteristics of the wastewater over a period of time. The effects of intermittent changes in strength and flow are mitigated. Composite samples provide sufficiently

accurate data if the variability of the waste characteristics is not extreme; however, the variability of these characteristics must be determined by the analysis of grab samples. The maximum time over which a composited sample may be accumulated is to a degree limited by the period the sample can be stored without changing its characteristics.

7.3.2 Sample Location

The sampling point for the wastewater treatment process is at the sample tank located adjacent to the neutralization sump. Samples are collected via a programmable ISCO sampler that is connected to the sample tank. The sample parameters, monitoring frequency, and method of sample collection are stated in the Permit (Appendix A). All sample analysis as required by the permit must be performed by an approved, California-certified laboratory facility.

Additional grab samples may be drawn off from individual tanks via sampling port. These samples are to be used for in-house testing and monitoring for optimization of treatment processes.

7.3.3 Sample Storage

Composite samples must be preserved in such a way that the characteristics to be measured do not change in quantity or quality. Special collection methods are sometimes required. The analytical laboratory will provide specific preservative and storage requirements for specific analytes.

The final step after a sample has been collected, composited, and preserved is to identify the sample properly and clearly before it is submitted to the laboratory. At the minimum, the following are required for the sample label:

- Designation or location of sample collection
- Date and time of collection
- Indication of grab or composited sample with appropriate time and volume information
- Notation of information that may change before laboratory analyses are made such as temperature, pH, and appearance
- Initials or name of individual who took the sample
- Note regarding preservation used, if any



7.4 Laboratory Procedures

The selected laboratory will be certified for wastewater analysis in California, and will analyze each sample for each indicated parameter in accordance with the methods established by 40 CFR Part 136.

7.4.1 Laboratory References

The following list of references is recommended as they offer instructions for performing laboratory tests.

- American Public Health Association. *Standard Methods for Examination of Water and Sewage*.
- United States Environmental Protection Agency. *Methods for Chemical Analysis of Water and Waste* (GPD Stock No. 5501-0067).
- WPCF Publication No. 18, "Simplified Laboratory Procedures for Wastewater Examination."
- WPCF Manual of Practice No. 11, "Operation of Wastewater Treatment Plants."
- Sawyer, Claire N. *Chemistry for Sanitary Engineers*. New York, McGraw-Hill. 1967.



8.1 MAINTENANCE

Regularly scheduled equipment maintenance is of the utmost importance and absolutely must be performed to obtain reasonable service life from the equipment. It is important that all employees of the wastewater treatment plant become familiar with necessary routine maintenance on equipment.

8.2 Scheduled Maintenance

Scheduled events listed below are suggested, and facility staff may adjust accordingly to maintain optimal plant performance.

8.2.1 Daily

Each day that the facility is operating, facility staff should:

- Clean all pH probes, follow probe manufacturer recommendations for probe cleaning
- Check calibration of pH probes, if off, recalibrate probes using pH meter manufacturer instructions
- Check all float switches
- Calibrate analytical equipment
- Grease centrifuges and Moyno pumps and other rolling stock as needed.
- Check gear oil and air compressor oil levels
- Check fluid levels on loaders.
- Check coolant water level on ozone generator

8.2.2 Weekly

- At a minimum pH probes will be calibrated each week
- Inspect air compressor for properly functioning blow off
- Check plows on centrifuges and adjust/replace as needed.

8.2.3 Monthly

- Change compressor oil and filters. Drain condensate from receiver.
- Check air dryers and replace as needed.

8.2.4 Annually

All pumps and equipment will be checked annually to confirm that they are in working order, and do not require replacement. Additionally, as per the Permit requirements, the flow meter(s) on the discharge line(s) will be calibrated and recertified, as needed.



8.3 Troubleshooting

The importance of inspection as part of the overall maintenance program cannot be overstressed. All plant employees should participate in the inspection process to insure that problems in any area are resolved as soon as possible. Any issues with any equipment should be followed up with manufacturer's recommendations; a list of some common potential issues with their potential fix is listed below.

- Chemical dosing pumps not operating/poor separation: Confirm that diaphragms are sound, and check valves are not sticking or fouled by confirming flow.
- Metals not precipitating from wastewater: check that pH probe is properly calibrated, as metals precipitation is strongly contingent upon pH.
- Flow rate through organo-clay vessels drops: it is likely that pressure has built up as media is spent. Initiate media change out process, and investigate pressure alarms to confirm they are properly operating.

As the facility continues operation, operators should amend this troubleshooting list to include any common issues and solutions as they are identify.

8.4 Inspection

The importance of inspection as part of the overall maintenance program cannot be overstressed. All plant employees will participate in the inspection process to insure that problems in any area can be quickly discovered and remedied. Each employee is encouraged to report any problems observed while working in the plant.

At the start of and completion of each shift, the facility operator will do a complete walkthrough of the facility. The purpose of this walkthrough is to identify any leaks or potential issues with the facility. The operator will take this time to ensure that if any equipment needs to be turned on or off, it is done so.

8.5 Housekeeping

A general cleanup of the plant each day not only provides a more pleasant place to work, it also helps improve overall plant performance. This cleanup will at least consist of a general floor wash down, removal of trash, organization of supplies and materials, cleaning of filter press area, and cleaning of the laboratory/office area. Appendix A City of Oxnard Industrial Discharge Permit (Pending permit issuance) Appendix B Oxnard City Code Appendix C Process Flow Diagram Appendix D Facility Layout Appendix E Safety Data Sheets Appendix F Sample Daily Shift Log Appendix G Additional Forms

374 Poli Street, Suite 200 • Ventura, CA 93001



DUST CONTROL PLAN For Centralized Waste Treatment Facility

RI-NU Services, LLC 815 Mission Rock Road Santa Paula, CA 93060

August 2018 Updated November 2020

Prepared for: RI-NU Services, LLC 15218 Summit Avenue, Suite 300 #601

Fontana, CA 92336

Prepared by: Sespe Consulting, Inc. 374 Poli Street, Suite 200 Ventura, CA 93001 (805) 275-1515

County of Ventura Initial Study PL15-0106 Attachment 19 - Proposed Dust **Control Plan**



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DUST CONTROL PLAN For Centralized Waste Treatment Facility

RI-NU Services, LLC Santa Paula, California

August 2018 Updated November 2020

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B. Copy of VCAPD Rule 55 – Fugitive Dust

DUST CONTROL PLAN

RI-NU Services, LLC Santa Paula, California

November 2020

1.0 INTRODUCTION AND SUMMARY

Facility Name:	RI-NU Services, LLC
Facility Address:	815 Mission Rock Road Santa Paula, California 93060
Site Contact:	Timothy J. Koziol, (915) 323-7200
Type of Material Processed:	Non-Hazardous Centralized Waste Treatment Facility
Scale of Operation:	Approximately 6.6 acres

The proposed operations at the RI-NU Services, LLC (RI-NU) Facility (Facility) include: accepting, treating, and off-site disposal by truck of various types of non-hazardous wastewater. The primary expected sources of dust generation from this Facility include a solids mixing operation and windblown dust from unpaved surfaces. A water truck and street sweeper will be the main methods used to minimize fugitive dust emissions from the facility:

- For mixing operations, water from the water truck will be sprayed as needed on the stockpiles of solidification material (i.e. saw dust, compost, etc.) that will be located on the northeast end of the two (2) Mixing Areas (see attached Site Plan). Water will also be sprayed as needed to control loosened material that may fall on paved surfaces while being transported from one end of the Mixing Areas to the other. The post-mixed material stored on the southwest end of the Mixing Area will not typically need to be sprayed by the watering truck because this material will be stored underneath a cover.
- The water truck will also be used as needed to control fugitive dust emissions from unpaved surfaces on the north and south-central areas of the facility. The truck may also be used to spray paved surfaces. A non-toxic chemical stabilization dust suppressant may also be applied as needed to unpaved surfaces to minimize fugitive dust emissions. This chemical suppressant will comply with all applicable air and water quality government standards.
- Sweeping will be conducted as needed on paved surfaces where dust or loose, dry material has accumulated.
- Lastly, a Facility-wide speed limit of 15 Miles Per Hour (MPH) or less will be enforced on both unpaved and paved surfaces.

Table 1-1 presents personnel responsible for Plan implementation:

Role	Contact and Telephone Number	Responsibility
Environmental Manager	Timothy Koziol (915) 323-7200	Ensure implementation of this PlanMaintain and update this Plan
Site Monitor 1	Mike Legan (805) 407-2366	- Monitor the Facility for dust related issues.
Site Monitor 2	To Be Determined	- Ensure compliance with the provisions of this Plan.

Table 1-1 Plan Implementation Responsibility

2.0 GENERAL REGULATORY REQUIREMENTS APPLICABLE TO THIS FACILITY

Ventura County Air Pollution Control District (VCAPCD) Rule 55 regulates fugitive dust emissions associated with this Facility. General Rule 55 requirements are:

- No visible dust beyond the property line either:
 - Beyond the midpoint (width) of a public street or road adjacent to the property line, or
 - o 50 feet from the property line if there is not an adjacent public street or road.
- No emissions of fugitive dust of 20 percent opacity or greater for a cumulative 3 minutes or more in any one (1) hour.
- No track-out from Facility 25 feet or more in length unless at least one of the following three control measures is utilized:
 - *Track-Out Area Improvement:* Pave or apply chemical stabilization to maintain a stabilized surface from the point of intersection with public paved surface and extend for a centerline distance of at least 100 feet.
 - *Track-Out Prevention:* Check and clean the undercarriage and wheels on all vehicles before leaving unpaved surface or install a properly functioning and well-maintained track-out control device(s).
 - Track-Out Removal: Remove track-out from pavement as soon as possible but no later than one hour after it has been deposited on the paved road.

All track-out shall be removed at the conclusion of each workday or evening shift.

- No person (including facility or site operator) shall load or allow the loading of bulk materials or soil onto outbound trucks unless at least one of the following dust prevention techniques is utilized:
 - Use properly secured tarps or cargo covering that covers the entire surface area of the load or use a container-type enclosure.
 - Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and ensure that the peak of the load does not extend above any part of the upper edge of the cargo area.

- Water or otherwise treat the bulk material to minimize loss of material to wind or spillage.
- Other effective dust prevention control measures.

A copy of the Ventura County Air Pollution Control District (VCAPD) Rule 55 is provided for reference in Appendix B.

3.0 DUST GENERATING SOURCES

The Mixing Areas and Facility-wide unpaved surfaces are the primary expected sources of dust generation. Potential sources of dust include:

Mixing Areas: Solids generated by the waste treatment processes are transferred to Mixing Area #2. These solids tend to be very wet and should not generate dust. Solidification materials (sawdust) are mixed with the wet solids to solidify and prepare them for off-site transport and disposal. The mixing occurs in Mixing Area #2. After mixing, the solids are moved to Mixing Area #1 for temporary storage. Mixed solids will normally be transported off site within one hour of being mixed. If mixed solids are left overnight, they will be covered. No unmixed solids will be left overnight.

Within the Mixing Areas, dust maybe also be generated from the stockpiles of dry solidification materials (saw dust) located near the northeast end of the two (2) Mixing Areas.

- **Unpaved Surfaces:** Fugitive dust from unpaved surfaces may be generated during windy conditions and blow onto paved areas of the site. Off-road vehicles (e.g. forklifts) may also travel on unpaved surfaces and track dust onto paved surfaces. On-road vehicles will not travel over unpaved areas.
- **Stationary Equipment:** Stationary equipment will be used to treat the influent waste water. Equipment following the six (6) Mixing Tanks, such as the Shaker or the Centrifuge, may produce fugitive dust emissions if wet, loose material were to dry-out and fall out of and / or off of the equipment.
- Material Transport: Dust may also be generated during the transportation of mixed waste material from one end of the Mixing Areas to the other end for loading into disposal trucks. Offsite transportation of waste materials may also generate dust if waste materials drop from hauling trucks while being loaded. For bulk loading of waste materials onto outbound trucks, the waste materials are expected to be very wet such that loss of material to wind should be minimal.

None of the above listed potential dust generating sources are expected to generate excessive levels of dust, so track-out is not expected to be an issue at this site.

4.0 FUGITIVE DUST CONTROL MEASURES

During normal wind conditions, typical control and mitigation measures (listed below in Section 4.1) are sufficient to control dust emissions. During high wind conditions, extra steps may be required to control dust generation.

Employees will be trained to identify when the requirements of VCAPD Rule 55 are not being met and to notify the site monitor.

4.1 Standard Dust Control Measures:

The fugitive dust control measures listed below will be used by the Facility to control dust generation:

- As a standard practice, fugitive dust throughout the site will be controlled by the use of a water truck (except during and / or immediately after rainfall). Only as needed, water will be applied to the Mixing Area and Mixing Area stockpiles, to the actively traveled region between northeast and southwest ends of the Mixing Areas, to paved surfaces throughout the facility and to unpaved surfaces.
- Paved surfaces will be swept, as needed.
- Post-mix material gathered at the southwest end of the Mixing Areas will also be covered while awaiting off-site disposal.
- Non-toxic chemical stabilization dust suppressants may be used on unpaved surfaces in lieu of regular watering with a water truck.
- RI-NU will enforce a 15 MPH or less Facility-wide vehicle speed limit. Signs shall be posted onsite limiting traffic to 15 MPH or less.
- Although material loss due to wind is not expected for outbound haul trucks due to the wet nature of the hauled waste materials, outbound haul trucks may utilize at least one of the following dust prevention techniques if dust generation becomes an issue
 - Use of a properly secured tarp or cargo covering that covers the entire surface area of the load.
 - Use of a container-type enclosure.
 - Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and ensure that the peak of the loads does not extend above any part of the upper edge of the cargo area.
 - Water or otherwise treat the bulk material to minimize loss of material to wind or spillage.

4.2 High Wind Dust Control Measures:

High wind dust control measures are not expected to be necessary because excavation and other significant dust producing activities will not be carried out within this Facility. Regardless, if wind were to exceed 25 MPH over a one-hour period or during other "high wind events" (wind of such velocity as to

cause fugitive dust to be blown from the Facility to off-site areas) dust producing activities will cease and additional watering will be initiated.

5.0 RECORDKEEPING

A current copy of this Fugitive Dust Control Plan shall be held and maintained onsite. If dust suppressants are used at the facility, the following records will be kept (VCAPD Rule 55.E.6):

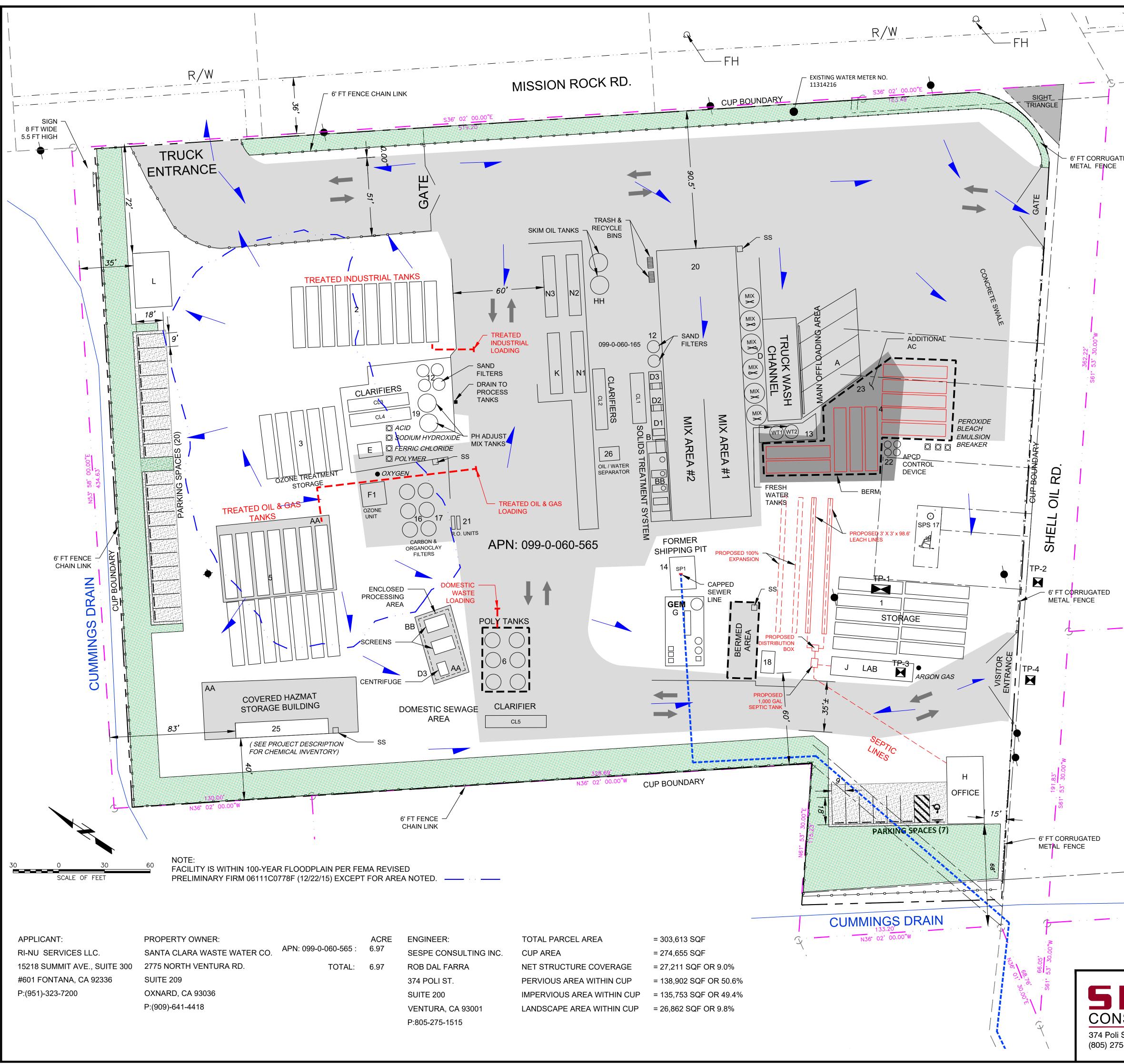
- Dust Suppressant Records: Any person using dust suppressants shall keep the following records:
 - Description of dust control measure;
 - Location and extent of coverage;
 - Date, amount, and frequency of application of dust suppressant; and
 - Manufacturer's dust suppressant product information sheets.

Any documentation related to this Plan shall be retained for a minimum of 2 years (VCAPD Rule 55.E.7).

RI-NU Services, LLC Dust Control Plan November 2020

APPENDIX A

SITE PLAN



/-		M3 10,000 SQ. FT. EXISTING COMMUNITY	PINKERTON AL	PROJECT LO	DCATION
: <u>L</u>	EGEND			VICINITY MAP	
		CUP BOUNDARY 6.3 ACRE ± LOT LINE PARCEL LINE 6 FT HIGH CHAINLINK FENCE 6 FT HIGH CORRUGATED ME EASEMENTS EXISTING AC./CONCRETE		N.T.S. TRAFFIC ARROW FIRE HYDRANT (FH) EDISON POWER POLE BERM DAY TANK" IN USE CHEMICAL ON CONTA COMPRESSED GAS CY	INMENT
S61• 53' 30.00"W	TP-1	PROPOSED AC./CONCRETE LANDSCAPE AREA GRAVEL SURFACE LOCATION OF BACKHOE EXPLORATION TEST PIT		 ABANDONED OIL WELL ACTIVE OIL WELL DRAINAGE DIRECTION SAFETY SHOWER/EYE SEWER LINE TO OXNA TP-2 LOCATION OF BACKHOR PERCOLATION TEST P 	I EWASH ARD DE
	N = NEW E = EXISTING	ID 2010 Approved CUI A Receiving Bays (4) B Trash/Grit Removal Unit	А	PERCOLATION TEST P 2017 Proposed Equipment Receiving Bays (4) Trash/Grit Removal Unit	N/E E E
		D1 Centrifuge Unit D2 Centrifuge Unit	D D1	Clarifier Units (5) Mixing Tanks (6+) Centrifuge Unit Centrifuge Unit	E N E E
		D3Centrifuge UnitD4Belt PressEElectro-Coagulation Unit	D3	Centrifuge Unit Electro-Coagulation Unit or other Metal Removal Ur	E nit N
		F1Ozone Unit #1F2Ozone Unit #2GUV/Oxidation UnitHDouble Wide Office Trailer		Ozone Unit GEM Unit 1056 sq. ft. portable trailer (office)	<u>N</u> N N
		I Temporary Office Trailer J Laboratory/Receiving Office K Maintenance Shed L Employee Changing Room		648 sq. ft. portable trailer (lab) Maintenance Shed 864 sq. ft. portable trailer (employee changing roon	N E n) N
RUGATED		M Break Room (old receiving office N1 Sea Container (records storage) N2 Sea Container (parts storage)) N1	Sea Container (records storage) Sea Container (parts storage)	E E
		N3Sea Container (parts storage)N4Sea Container (parts storage)N5Sea Container (parts storage)N6Sea Container (parts storage)	N3	Sea Container (parts storage)	E
		N7Sea Container (parts storage)OSea Container (chemical storagePAugerQCKD Silo	trailer)		
		AA 3 – concrete pads BB 2-Plate Presses on concrete Bloc CC Old Office (removed) DD Old Air Stripper Unit (removed) EE Old Tool Shed FF Old Carbon Filters		3 – concrete pads 2-Shaker Units (screens)	E N
		GGOld Frac TankHHOld Skim Tanks (2) w/ concrete sII4 – Old Frac Tanks		Skim Tanks (2)	N
		110 - 5000 gallon process tanks27 - 5000 gallon process tanks320 - 5000 gallon process tanks440 - 5000 gallons process tanks	1 2 3 4	10 – 20,000 gallon waste receiving tanks 10 – 20,000 gallon process tanks 5 – 20,000 gallon process tanks 10 – 20,000 gallon waste receiving tanks	E E N
		 5 Pond #1 (surface impoundment) 6 20 - 5000 gallon process tanks 7 Pond #2 (surface impoundment 8 10,000 gallons process tank 9 10,000 gallons process tank 10 10,000 gallons process tank 	5	14 – 20,000 gallon process tanks 6 - 6,000 gallon poly process tanks	E N
		11Offloading pump12Sand Filters (6)13Sand Filters (6)	13	Sand Filters (6 to 8) Portable Water Tanks	N N
GATED E		14Shipping Pit1510,000 gallons process tank16Carbon Filters (2)17Micron Filtration Pods	16	Shipping Pit (Not Used) Carbon Filters Filter Units (organo-clay)	E N N
		18Diesel Fuel Tank (w/secondary compared by the secondary compared by t	ontainment) 18 19	pH Adjustment Tanks	E N
		TBDand (2) Screening BaysTBDStockpile storage and recycle areTBDTwo reverse Osmosis Units;TBDOne Control Device;	21	Stockpile storage and recycle area; Two reverse osmosis units (or equivalent technolog One VCAPCD Control Device;	E gy) N E
		TBD30- Water Processing TanksTBDAll Awnings and concrete padsTBDThree foot deep grass storm wat	23 er holding basin;	New 4,852 square foot concrete pad 610 sq. ft. hazardous materials storage building	<u>N</u>
		Total Approved Process T N/E – New or Existing on Site	26 anks = 143	oil/water separator Total Proposed Process Tanks = 95	N
565 565 565 565 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 575 57	G, INC. • Ventura, CA 93	3001 SCALE: HORIZ. AS SHOWN VERT. AS SHOWN	RI-NU WAS REATMEN	TE WATER T FACILITY PLAN - SEPTIC TU	

NCZ0 ZONE:

M3 10,000 SQ. FT.

RI-NU Services, LLC Dust Control Plan November 2020

APPENDIX B

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT RULE 55 – FUGITIVE DUST

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

RULE 55 – FUGITIVE DUST

(Adopted 6/10/08)

A. Applicability

The provisions of this rule shall apply to any operation, disturbed surface area, or man-made condition capable of generating fugitive dust, including bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

B. General Requirements – All Fugitive Dust Sources

- 1. Visible Dust Beyond the Property Line: No person shall cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.
- 2. Opacity: No person shall cause or allow the emissions of fugitive dust from any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative 3 minutes or more in any one (1) hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance.
- 3. Track-Out
 - a. No person shall allow track-out to extend 25 feet or more in length unless at least one of the following three control measures is utilized:
 - i. Track-Out Area Improvement: Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with public paved surface, and extend for a centerline distance of at least 100 feet with an acceptable width to accommodate traffic ingress and egress from the site.
 - Track-Out Prevention: Check and clean the undercarriage and wheels on all vehicles before leaving unpaved surface or install a properly functioning and well-maintained track-out control device(s) that prevents track-out of soil onto paved public roads.
 - iii. Track-Out Removal: Remove track-out from pavement as soon as possible but no later than one hour after it has been deposited on the paved road. If a street sweeper is used to remove any track-out, only

PM10-efficient street sweepers certified to meet South Coast AQMD Rule 1186 requirements shall be used. The make and model information and certification documentation of any sweeper used shall be made available upon request.

Notwithstanding the preceding, all track-out shall be removed at the conclusion of each workday or evening shift subject to the same condition regarding PM-10 efficient street sweepers as outlined in Subsection B.3.a.iii. The use of blowers for removal of track-out is expressly prohibited under any circumstances.

C. Specific Activity Requirements

- 1. Earth-Moving: No person shall engage in earth-moving activities in a manner that creates visible dust emissions over 100 feet in length.
- 2. Bulk Material Handling Facilities Track-Out Prevention: No person shall conduct an active operation with a monthly import or export of 2,150 cubic yards or more of bulk material without utilizing at least one of the following measures at each vehicle egress from the site to a public paved road:
 - a. Install a pad consisting of washed gravel (minimum size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long.
 - b. Pave the surface at least 100 feet long and at least 20 feet wide.
 - c. Utilize a wheel shaker/wheel spreading device, also known as a rumble grate, consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and sufficient width to allow all wheels of vehicle traffic to travel over grate to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.
 - d. Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.
 - e. Any other control measure or device that prevents track-out onto public paved roads.
- 3. Truck Hauling: No person (including facility or site operator) shall load or allow the loading of bulk materials or soil onto outbound trucks unless at least one of the following dust prevention techniques is utilized:

- a. Use properly secured tarps or cargo covering that covers the entire surface area of the load or use a container-type enclosure.
- b. Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and insure that the peak of the load does not extend above any part of the upper edge of the cargo area.
- c. Water or otherwise treat the bulk material to minimize loss of material to wind or spillage.
- d. Other effective dust prevention control measures.

D. Exemptions

- 1. This rule shall not apply to:
 - a. On-field agricultural operations.
 - b. Off-field agricultural operations necessary to minimize adverse effects on agricultural or horticultural commodities caused during officially declared disasters or states of emergency.
 - c. Active operations conducted during emergency life-threatening situations, or in conjunction with any officially declared disaster or state of emergency.
 - d. Active operations conducted by essential service utilities to provide electricity, natural gas, telecommunication, water or sewer during periods of service outages or emergency disruptions.
 - e. Weed abatement operations provided that:
 - i. Mowing, cutting or other similar process is used which maintains weed stubble at least three inches above the soil, or
 - ii. Any disking or similar operation where effective dust emission prevention control measures are used.
 - f. Abrasive blasting operations meeting the requirements of Rule 74.1.
 - g. Unpaved service roads having traffic volume of 20 vehicle trips or fewer per day used by one or more public agencies for inspection of infrastructure and not used for construction or maintenance-related activity.

- h. Motion picture, television, or video production activities when dust emissions are required for visual effects. In order to obtain this exemption, the APCO must receive notification in writing at least 72 hours in advance of any such activity and no nuisance results from such activity.
- i. Temporary earth coverings of public paved roadways where such coverings are approved by a local government agency for protection of the roadway, and where such roadway is closed to through traffic and visible roadway dust is removed within one day following cessation of activities.
- j. Any paved road unless it has track-out or any publicly-owned unpaved road.
- k. Demolition operations using blasting explosives, which have been permitted by the California Division of Industrial Safety.
- 1. The disturbance (i.e., disking, ripping, or scraping) of spreading ground lands in preparation for percolative groundwater recharge. Spreading ground lands are ponds, a system of ponds, or basins into which surface water is introduced for the purpose of allowing or enhancing the infiltration of water into underlying aquifers.
- 2. Frequently Traveled Private Unpaved Road Conditional Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line) and B.2 (Opacity) shall not apply to fugitive dust from frequently traveled (more than 20 vehicles per day passing in either direction) unpaved private roads if the operator has covered them with a low silt content material such as recycled road base or gravel to a minimum of four inches; or has implemented all of the following control measures:
 - a. Control Speed: Control speed to 15 miles per hour or less on unpaved roads through worker notification, signage, and any other necessary means.
 - b. Restrict Access: Restrict access to private unpaved roads currently used by the public either through signage or physical access restrictions.
 - c. Road Treatments: Treat unpaved and uncovered frequently traveled roads with water, mulch, or a non-toxic chemical dust suppressant that complies with all applicable air and water quality government standards. If treated, roads shall be treated in a manner that will avoid the sticking of mud to tires that will be carried onto paved public roads.
- 3. Lightly Traveled Unpaved Private Road Conditional Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line) and B.2 (Opacity) shall not

apply to fugitive dust from lightly traveled unpaved private roads if the operator has implemented both of the following control measures:

- a. Control Speed: Control speed to 15 miles per hour or less on unpaved roads through worker notification, signage, and any other necessary means.
- b. Restrict Access: Restrict access to private unpaved roads currently used by the public either through signage or physical access restrictions.
- 4. Storage Pile Conditional Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line) and B.2 (Opacity) shall not apply to fugitive dust from storage piles if the operator has implemented at least one of the following control measures:
 - a. Wind Sheltering: Enclose material in a three or four sided barrier equal to the height of the material.
 - b. Watering: Apply water at a sufficient quantity and frequency to prevent wind driven dust.
 - c. Chemical Stabilization: Apply a non-toxic dust suppressant that complies with all applicable air and water quality government standards at a sufficient quantity and frequency to prevent wind driven dust.
 - d. Covering: Install and anchor tarps, plastic, or other material to prevent wind driven dust.
- 5. High Wind Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line). B.2 (Opacity), and C.1 (Earth-Moving) shall not apply to fugitive dust when on-site wind speed exceeds 25 miles per hour (mph) for at least 5 minutes in any one hour period as measured by an anemometer with a minimum resolution of 1.0 mph provided:
 - a. Applicable control measures outlined in Table 1 have been implemented, and
 - b. Daily records of specific dust control measures have been maintained.
- 6. Track-out Exemption: The provisions of Subsection B.3 (Track-Out) shall not apply to on-road vehicles (trucks and passenger vehicles) associated with agricultural operations that have caused track-out due to excessively muddy conditions resulting from rainfall.
- E. Recordkeeping Requirements

- 1. Bulk Material Handling Records: Any operator handling bulk materials and having an APCD Permit to Operate shall keep a monthly log, available upon request, containing or referencing the following information:
 - a. Operator name, location of operation, and dates of operation.
 - b. Amount (in yards) of bulk material imported or exported per month.
 - c. Diagram or map of all egress sites to a public paved road and description of corresponding track-out control measure, if required by this rule.
- Frequently Traveled Unpaved Road Exemption Records: Any operator or owner of an private unpaved road claiming exemption from the requirements in Subsection B.1 (Visible Dust Beyond the Property Line) and Subsection B.2 (Opacity) shall keep the following records:
 - a. Operator name, location of operation, dates when road is open to travel.
 - b. List and diagram of unpaved private roads that have more than 20 vehicle trips per day with corresponding method and description of fugitive dust control. If an unpaved private road is being treated, then describe the method used to control speed and restrict access.
- 3. Storage Pile Exemption Records: Any owner or operator of a storage pile claiming the exemption from the requirements in Subsection B.1 (Visible Dust Beyond the Property Line) and Subsection B.2 (Opacity) shall keep the following records:
 - a. Operator name, location of operation, dates of operation
 - b. Description of control measure used to minimize fugitive dust including amount of material applied and frequency of application if watering or chemical suppressants are used.
- 4. High Wind Exemption Records: Any operator claiming the high wind exemption in Subsection D.5 shall keep daily records of specific dust control actions taken.
- 5. Track-Out Area Exemption Records: Any operator claiming an exemption from trackout area requirements in Subsection B.3.a shall keep the following records:
 - a. Operator name, location of operation, and dates of operations.
 - b. Description of control measure used in the improvement of the track-out area or control measure used to prevent track-out.

- 6. Dust Suppressant Records: Any person using dust suppressants shall keep the following records: Description of dust control measure; Location and extent of coverage; Date, amount, and frequency of application of dust suppressant; and Manufacturer's dust suppressant product information sheets.
- 7. Any recordkeeping required by this rule shall be made available to APCD compliance personnel upon request. Records shall be retained for a minimum of two years.
- F. Test Methods

Compliance with the opacity limit in Subsection B.2 shall be determined using EPA Method 9 with the following modifications:

- 1. Position: Stand at least 16.5 feet from the plume(s) with the sun oriented in the 140° sector to your back. If feasible, make opacity observations so your line of sight is approximately perpendicular to the direction of plume travel. To the extent possible, position yourself to make opacity observations using a contrasting background.
- 2. Field Records: Note the following on a record sheet:
 - a. Description and location of activity generating emissions, and method of control used, if any.
 - b. Observer's name, certification data, and affiliation, and a sketch of the observer's position relative to the dust generating activity and the sun, including estimated distances and direction to the plume.
 - c. Time that reading began, approximate wind speed and direction, description of the sky condition (presence and color of clouds), color of the plume, and type of background.
- 3. Observations: For each reading, make the observation at the highest opacity in the dust plume starting at an elevation line 5 feet above the emission source. Do not look continuously at the source, but make momentary observations once every 15 seconds. Record each observation to the nearest 5 percent. Each reading represents a 15 second period. If multiple plumes exist, do not include more than one plume in the line of sight at one time.
- 4. Compliance Determination: If the observer records twelve (12) readings of 20 percent or greater during a one-hour period, the source is not in compliance and observations may stop. The 20 percent or greater opacity readings are not required to be consecutive.

- 5. Only observers certified by the California Air Resources Board, or the U.S. Environmental Protection Agency may determine compliance with opacity limits.
- G. Violations

Failure to comply with any provision of this rule is a violation of this rule.

- H. Definitions
 - 1. "Active Operation": Any source capable of generating fugitive dust, including, but not limited to, bulk material handling, earth-moving activities, construction or demolition activities, or vehicular movement on unpaved surfaces.
 - 2. "Bulk Material": Sand, gravel, aggregate material less than two inches in length or diameter, and other organic or inorganic particulate matter.
 - 3. "Construction/Demolition Activities": Any on-site mechanical activities conducted in preparation of, or related to, the building, alteration, rehabilitation, demolition, or improvement of property, including, but not limited to, grading, excavating, loading, crushing, cutting, planing, or ground breaking.
 - 4. "Disturbed Surface Area": This means a portion of the earth's surface which has been physically moved, uncovered, destabilized, or otherwise modified from its undisturbed natural soil condition, thereby increasing the potential for emission of fugitive dust. This definition excludes those areas which have:
 - a. Been restored to a natural state, such that the vegetative ground cover and soil characteristics are similar to adjacent or nearby natural conditions;
 - b. Been paved or otherwise covered by a permanent structure.
 - 5. "Earth-Moving Activities": This means the use of any equipment for any activity where soil is being moved or uncovered, and shall include, but not be limited to the following: grading, earth cutting and filling operations, loading and unloading of dirt, adding to or removing from open storage piles, landfill operations, mining operations, and weed abatement operations.
 - 6. "Frequently-Traveled Unpaved Private Road": For the purpose of defining the conditional exemption in Subsection D.2, any private unpaved road where the count of vehicles traveling in either direction on the road exceeds 20 in any 24 hour period.
 - 7. "Fugitive Dust": Any solid particulate matter that becomes airborne, other than emitted from an exhaust stack, directly or indirectly as a result of the activities of any person(s).

- 8. "Lightly-Traveled Unpaved Private Road": For the purpose of defining the conditional exemption in Subsection D.3, any private unpaved road where the count of vehicles traveling in either direction on the road is 20 or less in any 24 hour period.
- 9. "Off-field Agricultural Operations": Any activities excluding those considered by this rule to be on-field agricultural operations.
- 10. "On-field Agricultural Operations": Activities, excluding travel on field access roads, conducted solely for the purpose of preparing land for the growing of agricultural or horticultural commodities, tree fruits, or raising of fowl or animals, such as:
 - a. Brush or timber clearing, grubbing, scraping, ground excavation, land leveling, grading, turning under stalks, disking or tilling.
 - b. Drying, pre-cleaning, handling, or storing of agricultural commodity material on the field where it was harvested.
 - c. Handling of fowl, or animal feed materials at sites where animals or fowl are raised.
 - d. Disturbing of cultivated land as a result of fallowing, seeding, planting, plowing, disking, fertilizing the soil, cultivating, irrigating, controlling weeds, thinning, heating, pruning, fumigating, spraying, dusting, or harvesting.
- 11. "Paved Road": A public or private improved street, highway, alley, public way, or easement that is covered by typical roadway materials including, but not limited to, asphalt paving or concrete. For this purpose of this rule, roads covered with recycled road base or gravel are not considered to be paved.
- 12. "PM-10 Efficient Street Sweeper": Any street sweeper certified by the South Coast AQMD to meet their Particulate Matter (10 microns and less) capture efficiency criteria outlined in SCAQMD Rule 1186 Appendix A.
- 13. "Source": A source includes all activities and operations that are located on contiguous property under common ownership or control, and includes associated facility-access and haul roads.
- 14. "Stabilized Surface": Any surface that has been treated, worked, or modified to increase soil stability in order to limit fugitive dust emissions. Methods used to stabilize surface include but are not limited to the following: watering, dust palliatives, vegetation, aggregates, and paving.
- 15. "Storage Pile": Any accumulation of bulk material or soil, which attains a height of three feet or more and a total surface area of 150 or more square feet.

- 16. "Track-Out": Any material that adheres to and agglomerates on the exterior surface or tires of motor vehicles, haul trucks, or mobile equipment that have been released onto a named, numbered, or lettered public paved road and can be removed by a PM-10 efficient street sweeper under normal operating conditions.
- I. Compliance Schedule:

The requirements of this rule shall become effective on October 8, 2008.

J. Compliance Status

Compliance with this rule shall not guarantee that a person will be in compliance with any other district rule or state regulation, including but not limited to, Rule 50 (Opacity), Rule 51 (Nuisance), Health and Safety Code Section 41700 (Nuisance), or Health and Safety Code Section 41701 (Opacity).

Control Measures Needed to Qualify for High Wind Exemption in Subsection D.5				
FUGITIVE DUST	CONTROL MEASURES			
SOURCE				
CATEGORGY				
Earth-Moving	1. Cease all active operations; OR			
	2. Apply water to soil not more than 15 minutes prior to earth-moving activities.			
Disturbed Surface Area	 On the last day of active operations prior to any Sunday, 1-day holiday, or any other period when active operations will not occur for at least four consecutive days, apply water with a mixture of chemical stabilizer diluted to not less than 5 percent by volume of the chemical stabilizer or to chemical stabilizer manufacturer specifications; OR Apply chemical stabilizers at least 30 minutes prior to the wind event; OR Apply water to all unstabilized disturbed areas at least every 4 hours during the wind event. If there is any evidence of wind-driven dust, water frequency is increased until wind-driven dust is minimized; OR Establish a vegetative ground cover within 21 days after active operations have ceased. Ground cover must be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter. 			
Unpaved Roads	1. Apply chemical stabilizers prior to allowing traffic; OR			
	2. Apply water at least twice per hour during active operations;OR			
	3. Stop all vehicular traffic.			
Open Storage Piles	1. Apply water at least twice per hour during the wind event; OR			
	2. Install temporary coverings.			

 Table 1

 Control Measures Needed to Oualify for High Wind Exemption in Subsection D.5



Ventura County APCD Rule 55, Fugitive Dust

On June 8, 2008, the Ventura County Air Pollution Control Board adopted Rule 55, Fugitive Dust. Rule 55 was adopted to comply with a state law that requires local air districts with air quality levels exceeding the state's particulate matter (PM) standards to adopt control measures to reduce PM air pollution. Ventura County exceeds the state's air quality standards for PM. The adverse health impacts from PM air pollution include asthma and other lung diseases, heart disease, and premature death. Ventura County APCD staff estimates that Rule 55 will reduce PM air pollution by 6 tons per day. <u>Rule</u> <u>55 becomes effective on October 8, 2008.</u>

Rule 55 applies to any disturbed surface area, or man-made condition capable of generating fugitive dust, including bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

In summary, the key provisions of Rule 55 are as follows:

- 1) Visible dust from an applicable source is prohibited or limited;
- 2) Measures must be taken to reduce or prevent track-out onto paved public roadways from an applicable source;
- 3) Track-out must be removed from roadways;
- 4) Visible dust exceeding 100 feet in length from earth-moving activities is prohibited;
- 5) Bulk material handling facilities with a monthly import or export of 2,150 cubic yards or more of bulk material must take measures to reduce or prevent track-out onto a paved public road, and;
- 6) Outbound trucks with bulk materials or soil must either be tarpped, have a 6 inch freeboard below the rim of the truck bed or be wetted or treated to minimize the loss of material to wind or spillage.

A more detailed summary of Rule 55 is attached. Copies of Rule 55 may be obtained at <u>www.vcapcd.org</u> under Rule Development (Current Rules and Regulations).

For additional information on Rule 55, contact air pollution engineer Stan Cowen at 805/645-1408.

Ventura County APCD Rule 55, Fugitive Dust Summary of Rule Requirements¹ Effective October 8, 2008

General Requirements – All Fugitive Dust Sources

Visible Dust Beyond the Property Line: No one shall cause or allow fugitive dust from any applicable source beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.

Opacity: No one shall cause or allow fugitive dust from any applicable source that equals or exceeds 20 percent opacity for 3 minutes or more in any one hour.

Track-Out:

No person shall allow track-out to extend 25 feet or more in length unless one of the following control measures is used:

- ✓ Track-Out Area Improvement: Pave or apply chemical stabilization to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extend for a distance of at least 100 feet with a width to accommodate traffic ingress and egress from the site.
- Track-Out Prevention: Check and clean the undercarriage and wheels on all vehicles before leaving unpaved surface or install a track-out control device(s) that prevents track-out of soil onto paved public roads.
- ✓ Track-Out Removal: Remove track-out from pavement as soon as possible but no later than one hour after it has been deposited on the road. If a street sweeper is used to remove any track-out, only "PM10-efficient" street sweepers certified to meet South Coast AQMD Rule 1186 requirements shall be used. The make, model information and certification documentation of any sweeper used shall be made available to APCD personnel upon request.

All track-out shall be removed at the conclusion of each workday or evening shift. The use of blowers for removal of track-out is prohibited.

Specific Activity Requirements

Earth-Moving: No person shall engage in earth-moving activities in a manner that creates visible dust emissions over 100 feet in length.

Bulk Material Handling Facilities Track-Out Prevention: No person shall conduct an operation with a monthly import or export of 2,150 cubic yards or more of bulk material without

¹ This is a summary of the Rule requirements. Refer to Rule 55, Fugitive Dust, for specific requirements.

utilizing at least one of the following measures at each vehicle egress from the site to a public paved road:

- ✓ Install a pad consisting of washed gravel (one inch minimum size) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long.
- ✓ Pave the surface at least 100 feet long and at least 20 feet wide.
- ✓ Utilize a wheel shaker/wheel spreading device, also known as a rumble grate, consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and sufficient width to allow all wheels of vehicle traffic to travel over grate to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.
- ✓ Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.
- \checkmark Any other control measure or device that prevents track-out onto public paved roads.

Truck Hauling: No person, including the facility or site operator, shall load or allow the loading of bulk materials or soil onto outbound trucks unless at least one of the following dust prevention measures is used:

- ✓ Use properly secured tarps or covering that covers the entire surface area of the load or use a container-type enclosure.
- ✓ Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and insure that the peak of the load does not extend above any part of the upper edge of the cargo area.
- \checkmark Water or treat the bulk material to minimize the loss of material to wind or spillage.
- \checkmark Any other effective dust prevention control measures.

Exemptions

Rule 55 does not apply to the following (this is a partial list - refer to Rule 55, Section D):

- ✓ On-field agricultural operations.
- ✓ Weed abatement operations provided that: (1) Mowing, cutting or other process is used which maintains weed stubble at least three inches above the soil, or (2) Any disking or similar operation where effective dust control measures are used.
- ✓ Unpaved service roads, with a daily traffic volume of 20 vehicle trips or fewer, used by public agencies for inspection of infrastructure.

- ✓ Motion picture, television, or video production activities when dust emissions are required for visual effects. The APCD must receive notification in writing at least 72 hours in advance of any such activity and no nuisance results from such activity.
- \checkmark Any paved road unless it has track-out or any publicly-owned unpaved road.
- ✓ The disturbance (i.e., disking, ripping, or scraping) of spreading ground lands in preparation for percolative groundwater recharge.

Frequently Traveled Private Unpaved Roads: The Visible Dust and Opacity requirements do not apply to dust from frequently traveled (more than 20 vehicles per day passing in either direction) unpaved roads if the road is covered with a low silt content material such as recycled road base or gravel to a minimum of four inches or implements <u>all</u> of the following control measures:

- ✓ Control Speed: Control speed to 15 miles per hour (mph) or less on unpaved roads through worker notification, signage, and any other necessary means.
- ✓ Restrict Access: Restrict access to private unpaved roads used by the public either through signage or physical access restrictions.
- ✓ Road Treatments: Treat unpaved and uncovered frequently traveled roads with water, mulch, or a non-toxic chemical dust suppressant that complies with all applicable air and water quality government standards. If treated, roads shall be treated in a manner that will avoid the sticking of mud to tires that will be carried onto paved public roads.

Lightly Traveled Unpaved Private Road Conditional Exemption: The Visible Dust and Opacity requirements do not apply to dust from lightly traveled unpaved roads if the operator implements <u>both</u> of the following control measures:

- ✓ Control Speed: Control speed to 15 mph or less on unpaved roads through worker notification, signage, and any other necessary means.
- ✓ Restrict Access: Restrict access to private unpaved roads currently used by the public either through signage or physical access restrictions.

Storage Pile Conditional Exemption: The Visible Dust and Opacity requirements do not apply to dust from storage piles if the operator has implemented <u>at least one</u> of the following control measures:

- ✓ Wind Sheltering: Enclose material in a three or four sided barrier equal to the height of the material.
- ✓ Watering: Apply water at a sufficient quantity and frequency to prevent dust.
- ✓ Chemical Stabilization: Apply a non-toxic dust suppressant at a sufficiently to prevent wind driven dust.

✓ Covering: Install and anchor tarps, plastic, or other material to prevent wind driven dust.

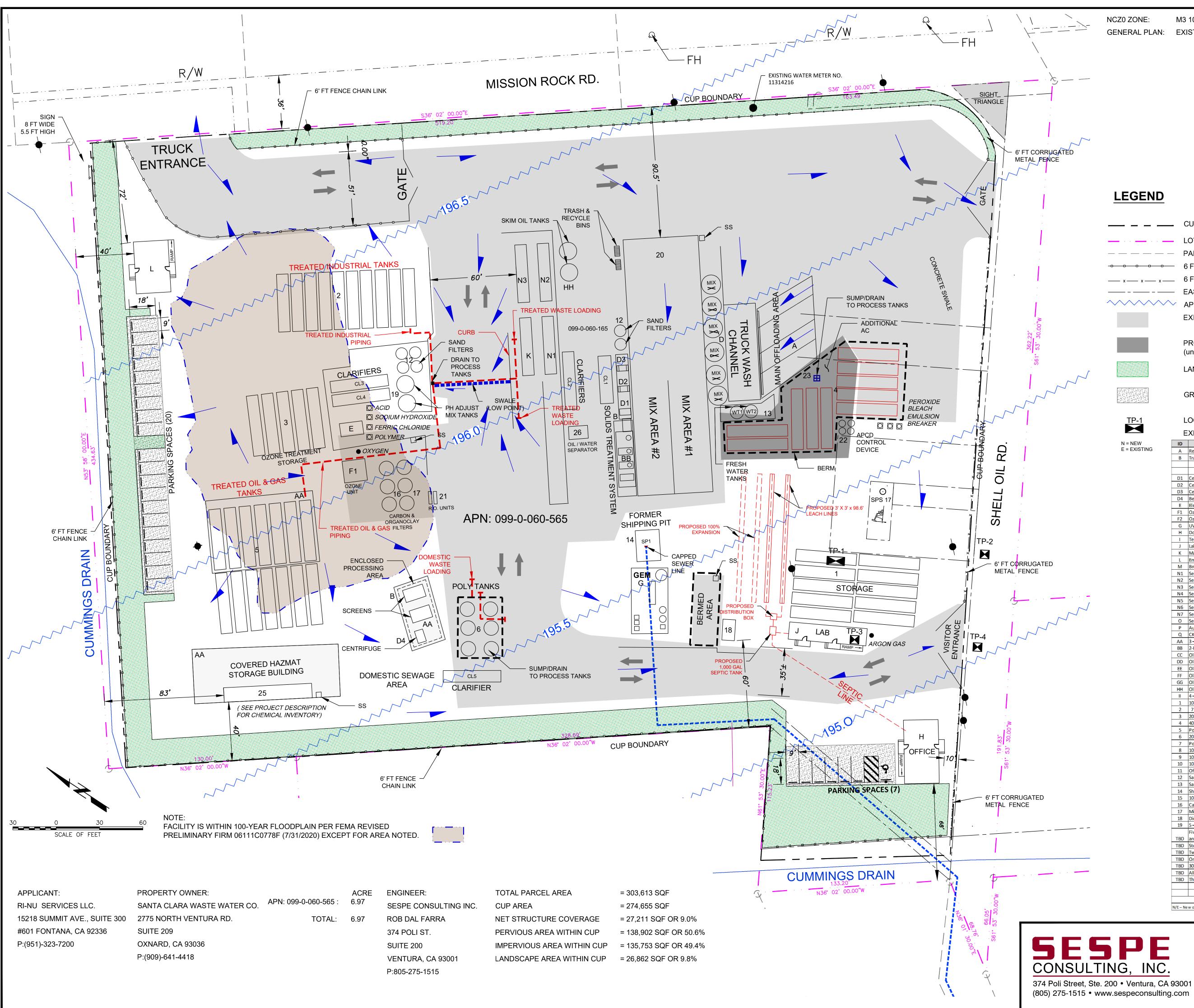
High Wind Exemption: The Visible Dust, Opacity and Earth-Moving requirements do not apply to dust when on-site wind speed exceeds 25 mph for at least 5 minutes in any one hour provided:

- ✓ Applicable control measures outlined in Table 1 (of the Rule) have been implemented, and
- ✓ Daily records of specific dust control measures have been maintained.

Track-out Exemption: The Track-Out requirements do not apply to on-road vehicles (trucks and passenger vehicles) associated with agricultural operations that have caused track-out due to excessively muddy conditions resulting from rainfall.

Recordkeeping Requirements

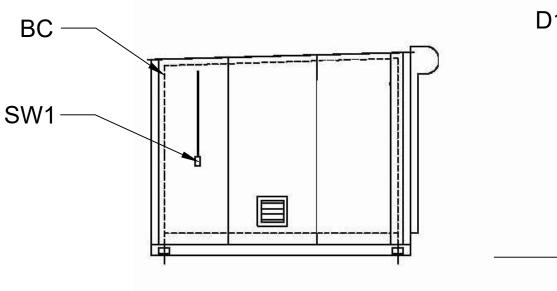
Consult Rule 55 for specific recordkeeping requirements

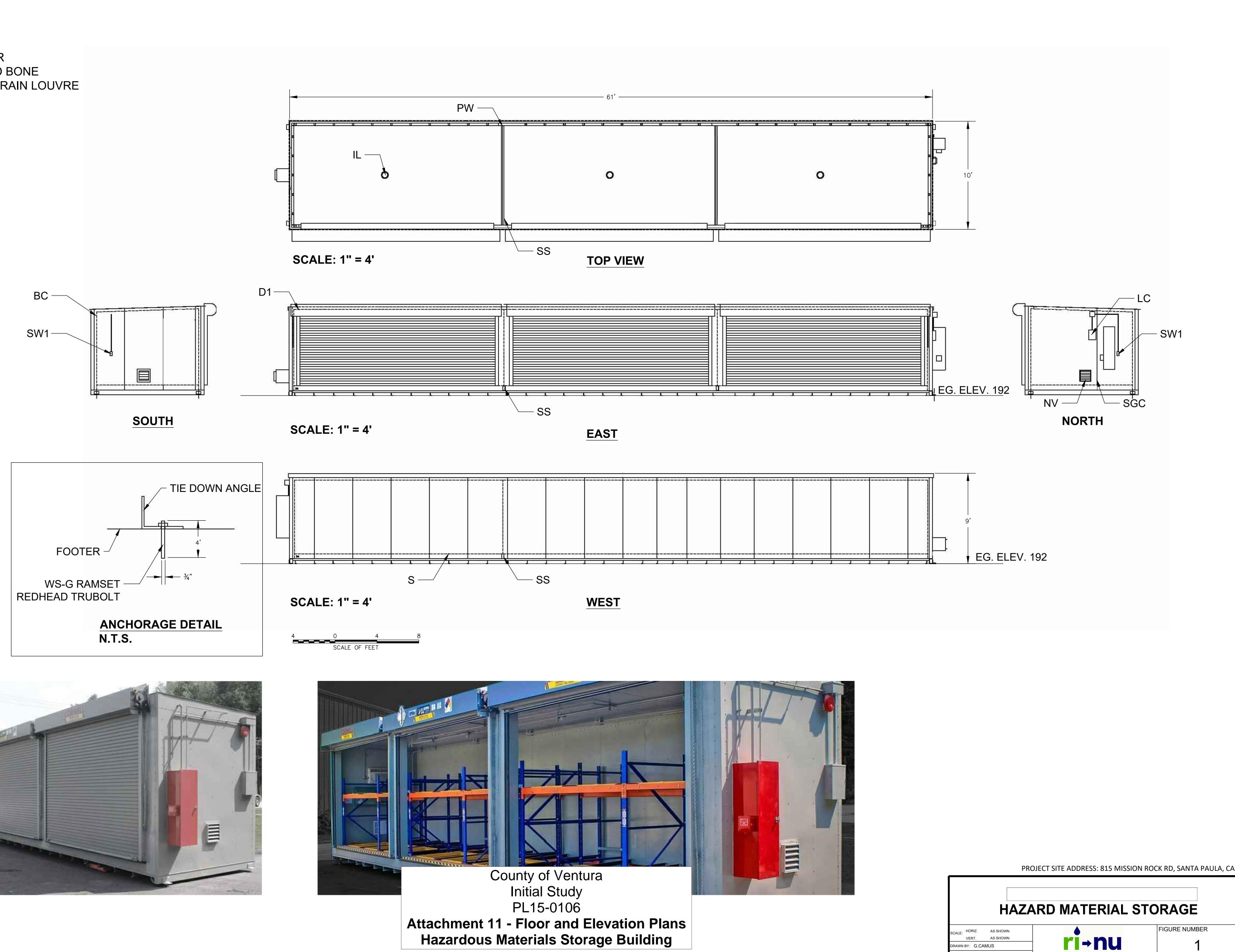


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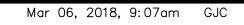
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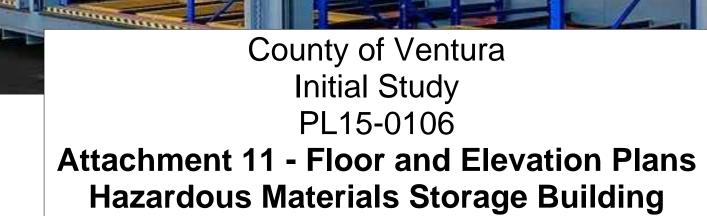
- S SUMP
- SGC STATIC GROUND CONNECTOR
- BC BUILDING COLOR BLEACHED BONE
- NV NATURAL VENTILATION WITH RAIN LOUVRE
- SS SUMP SEPARATOR
- **PW PARTITION WALL**
- LC LOAD CENTER
- IL INTERIOR LIGHTNING (3)
- SW1 LIGHT SWITCH
- D1 ROLLUP DOOR

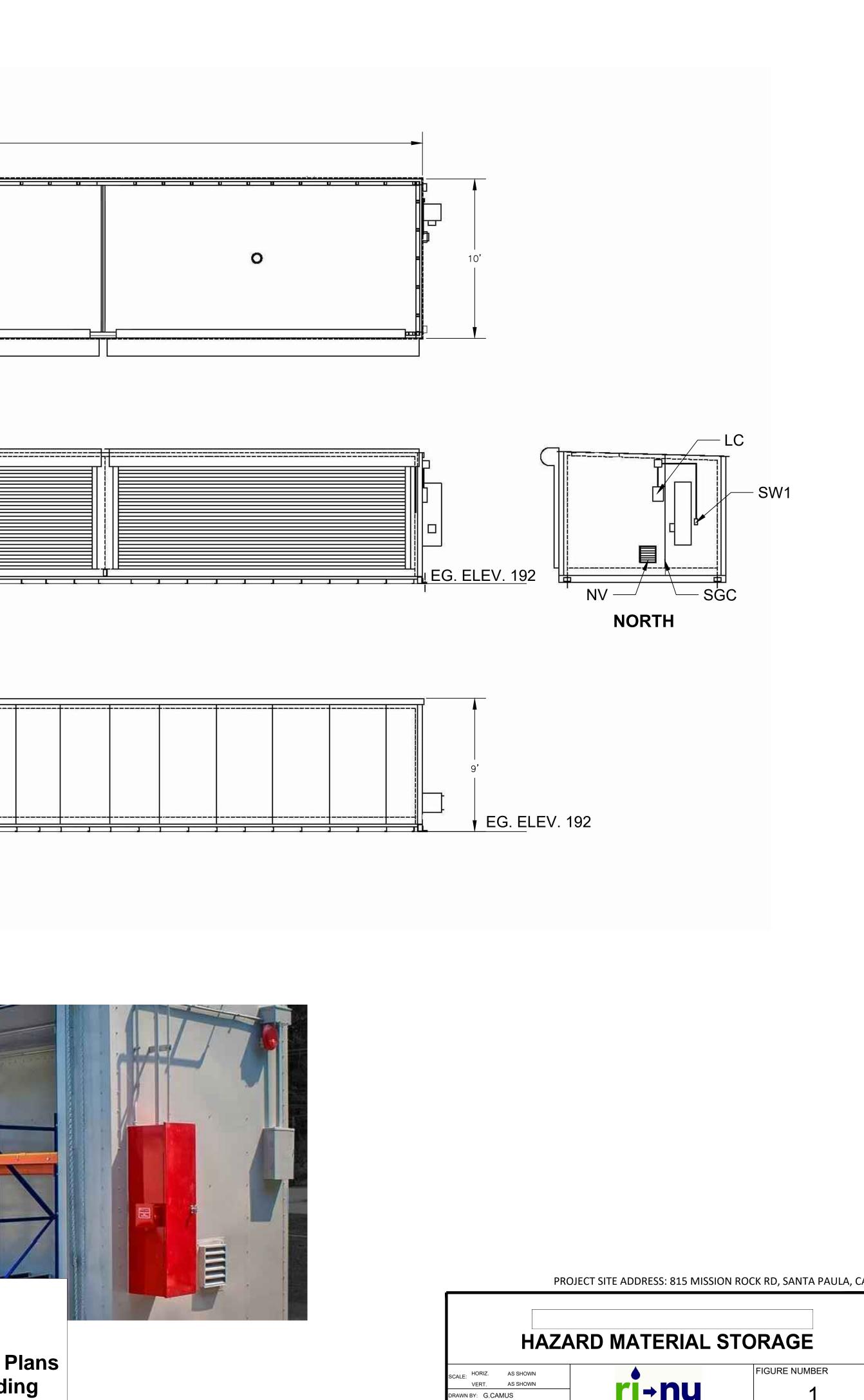






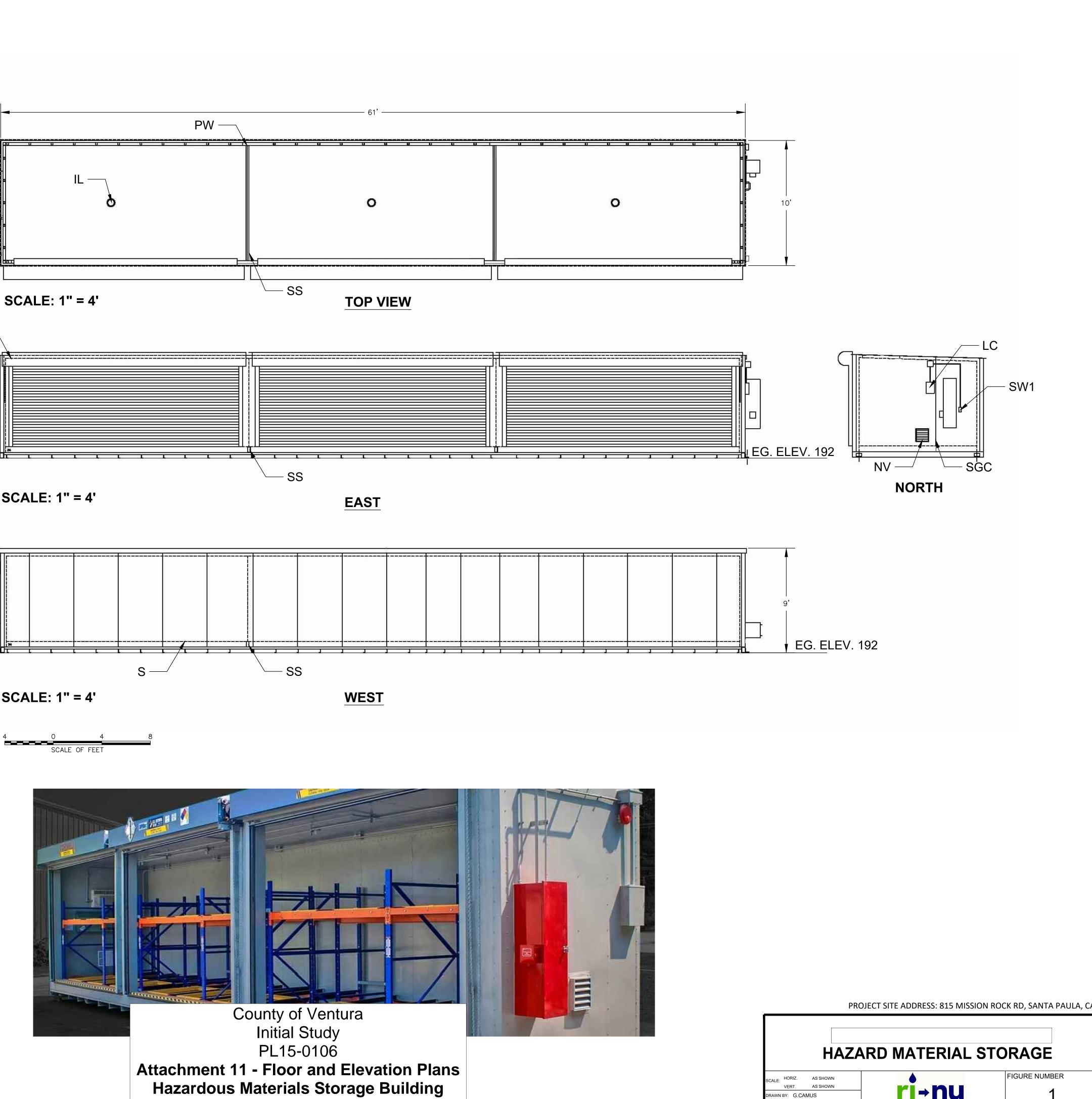


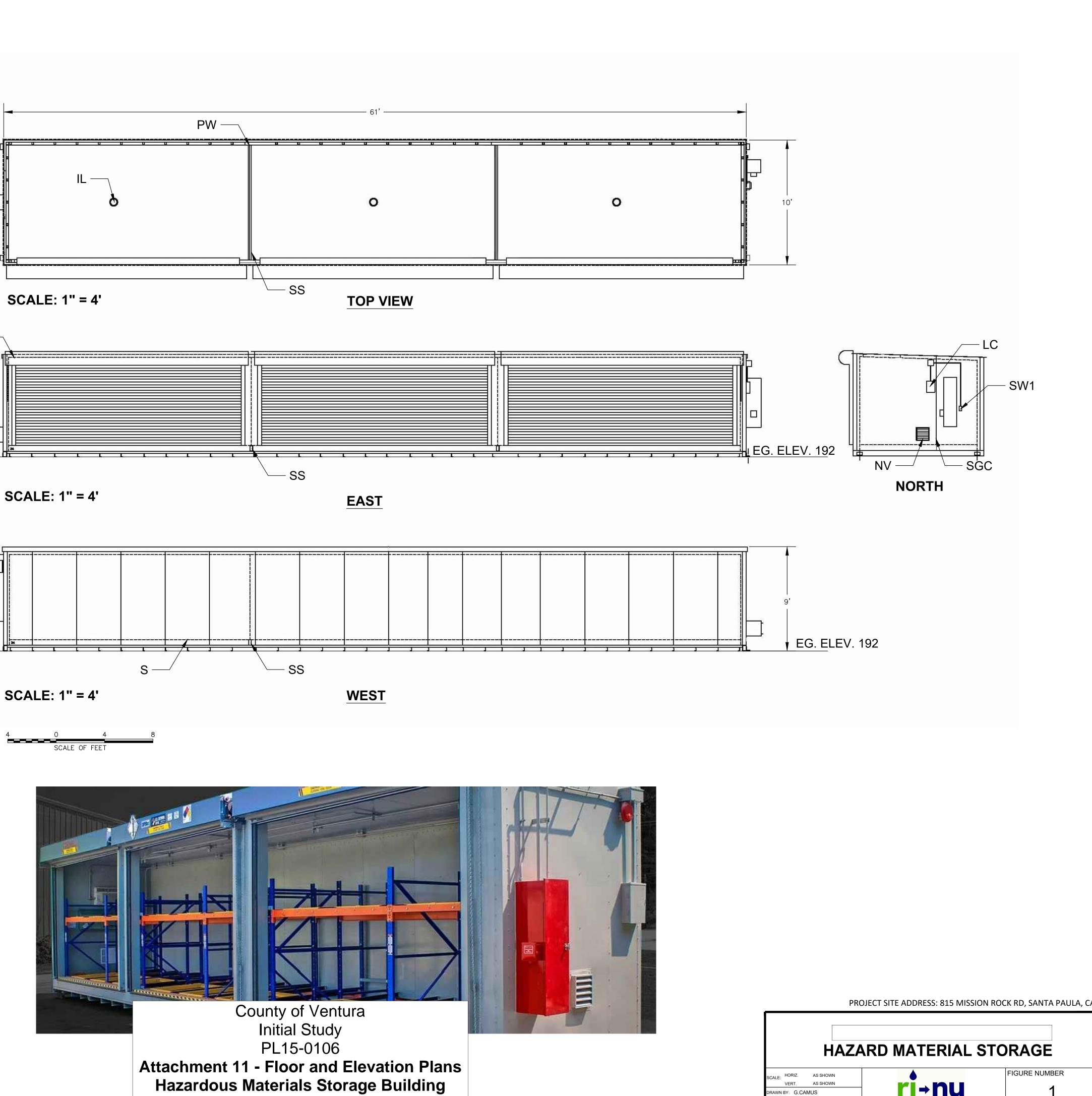


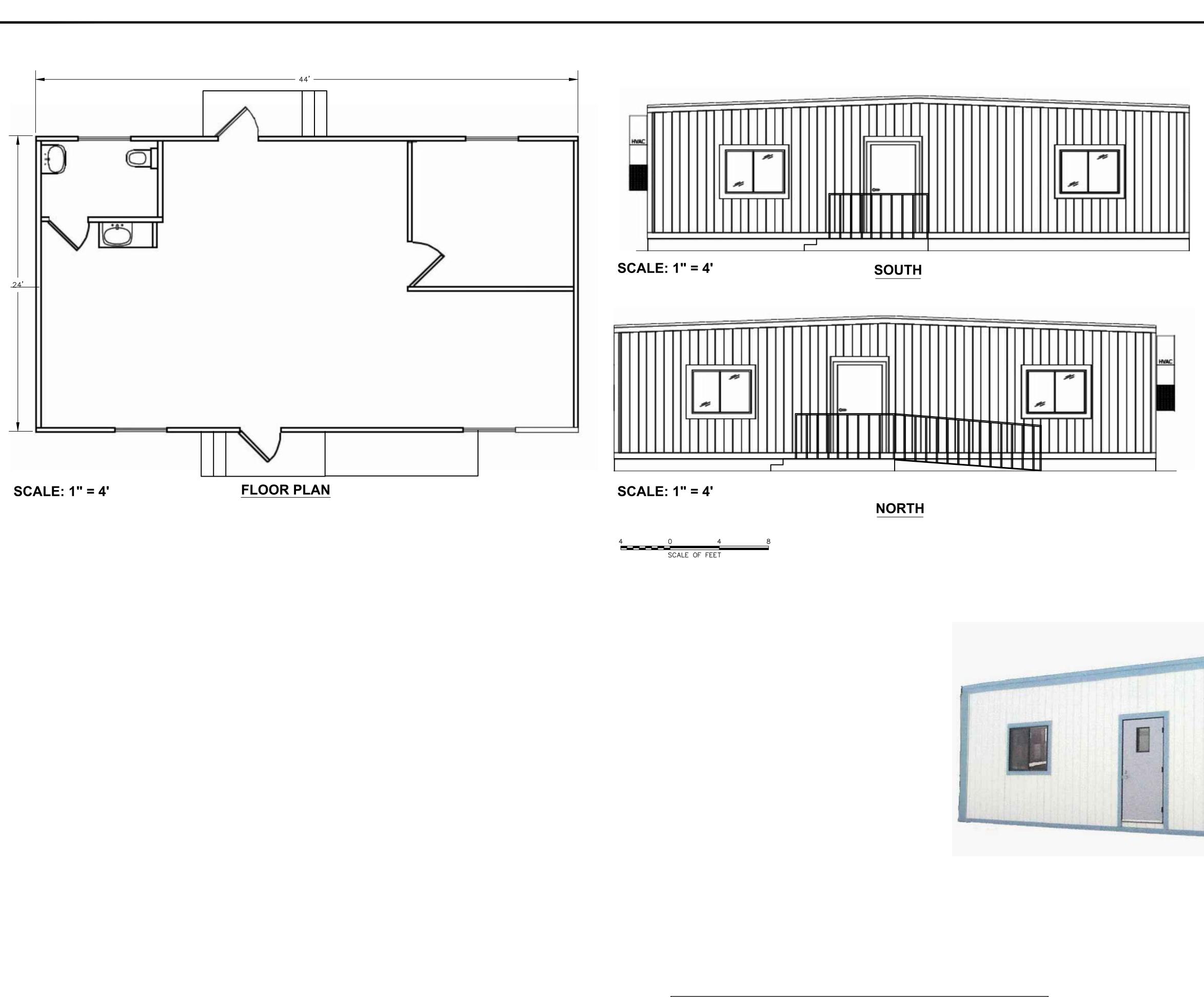


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Services, LLC.





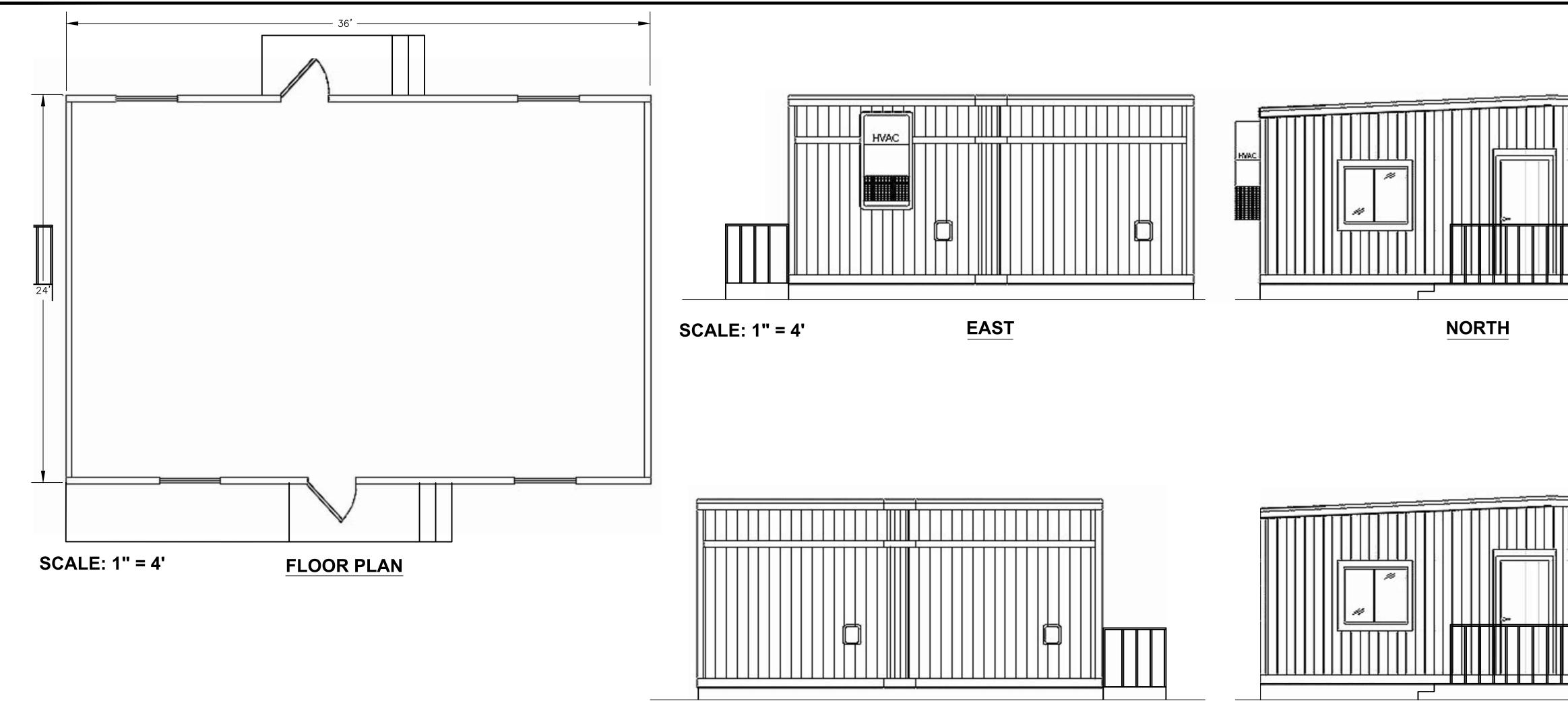


County of Ventura Initial Study PL15-0106 **Attachment 11 - Floor and Elevation** Plans Lab, Changing Room and Office

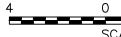


PROJECT SITE ADDRESS: 815 MISSION ROCK RD, SANTA PAULA, CA









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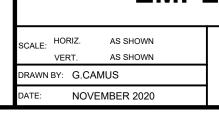
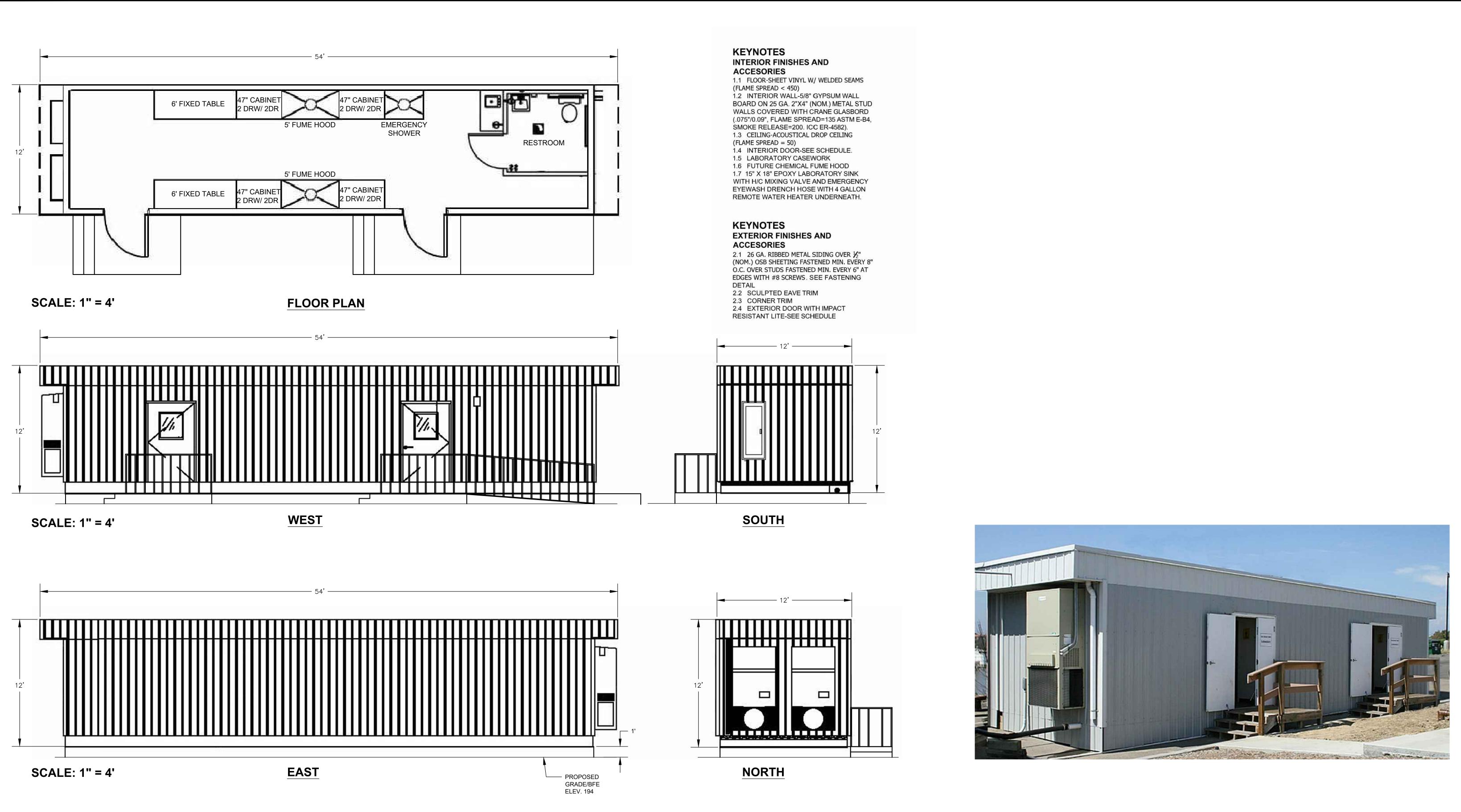




FIGURE NUMBER

# **RI-NU WASTE WATER** EMPLOYEE CHANGING ROOM

PROJECT SITE ADDRESS: 815 MISSION ROCK RD, SANTA PAULA, CA





PROJECT SITE ADDRESS: 815 MISSION ROCK RD, SANTA PAULA, CA





A Trinity Consultants Company

## **ON-SITE TRAFFIC ANALYSIS AND QUEUING PLAN**

**RI-NU Services, LLC** 

815 Mission Rock Road Santa Paula, CA 93060

May 2021

Prepared for:

RI-NU Services, LLC 15218 Summit Avenue, Suite 300 #601 Fontana, CA 92336

#### Prepared by:

Sespe Consulting, Inc. 374 Poli Street, Suite 200 Ventura, CA 93001 (805) 275-1515

RI NU_On Site Traffic Analysis_fnl-V2

County of Ventura Initial Study PL15-0106 Attachment 12 - On-Site Traffic and Queuing Plan

Sespe Consulting, Inc.



A Trinity Consultants Company

#### ON-SITE TRAFFIC ANALYSIS AND QUEUING PLAN

RI-NU Services, LLC Santa Paula, CA

May 2021

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#### **APPENDICES**

1. Operational Queuing Plan

### ON SITE TRAFFIC ANALYSIS AND QUEUING PLAN

RI-NU Services, LLC Santa Paula, CA

### 1.0 INTRODUCTION AND SUMMARY

Facility Name:	RI-NU Services, LLC
Facility Address:	815 Mission Rock Road Santa Paula, California 93060
Site Contact:	Timothy J. Koziol, (915) 323-7200
Type of Facility:	Non-Hazardous Waste Treatment Facility
Scale of Operation:	Approximately 6.6 acres

This analysis of expected on-site traffic for the proposed RI-NU services Facility is intended to evaluate expected traffic loading and develop appropriate traffic circulation patterns on the Facility to minimize potential for vehicle collisions and issues resulting from collisions.

### 1.1 Summary of On-site Operations

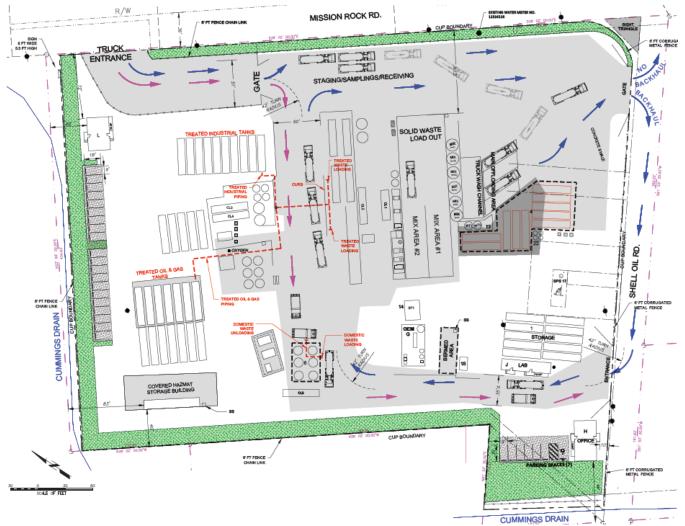
The proposed operations at the RI-NU Services, LLC (RI-NU) Facility (Facility) include: accepting, treating, and offsite disposal of various types of non-hazardous waste streams. Trucks from clients' waste producing operations transport non-hazardous waste to the Facility. The Facility accepts non-hazardous wastes which include domestic wastes, industrial wastewater, oily wastewater, and oilfield sludge wastes. The Facility pumps waste from incoming trucks into enclosed tanks for temporary storage before treatment. Semi-solid oilfield sludge wastes are transferred directly into the solid waste load out area for treatment. The Facility treats waste with equipment such as shakers, centrifuges, clarifiers, and screens. After treatment, the wastes are pumped into holding tanks and then loaded back into trucks for transportation to offsite disposal facilities. No treated waste will be transported via pipeline to an authorized disposal location.

There are two waste offloading areas:

- Domestic waste offloading is located on the west side of the Facility. As domestic waste trucks do not need to have their loads sampled, Facility personnel will direct domestic waste trucks to the offloading area when they arrive at the Facility.
- All other non-domestic waste trucks (industrial wastewater, oily wastewater, and oilfield sludge) will be staged at the east side of the Facility while their loads are inspected and sampled for laboratory analysis. Once approved, trucks will move to the main offloading areas located at the southeast side of the Facility.

There are two loading areas used to fill trucks with treated waste for offsite shipping:

- Domestic waste loading is located on the west side of the Facility next to the domestic offloading area.
- Treated non-domestic waste loading is located in the central portion of the Facility near the treated waste holding tanks. Please refer to Figure 1 for the location of the offloading and loading areas.



# Figure 1: Operational Queuing Plan.

## 1.2 On-site Traffic Activity

The project description proposed a daily average truck limit (all trucks) of 83.3 with a maximum daily total truck limit of 100 (this includes incoming waste trucks, outgoing waste trucks and other delivery trucks).

Please refer to Table 1 for the expected truck activity that was included in the most recent project description update. This truck activity estimate is based on the proposed daily average truck limit (all trucks) of 83.3 and optimistically assumes 50% of the trucks bringing non-domestic waste can be used to back haul treated waste off of the site.

### Table 1: Average Daily Truck Activity with 50% Backhaul

Proposed weekly truck limit: Ave. Daily Truck Limit:	500	trucks (1,000 t	rinc) Mon	·					
Ave. Daily Truck Limit:				bat.					
Ave. Daily Huck Lillit.	83.3								
Ave. Daily Waste Trucks:	80	assume ±3 tru	cks/day for s	upplies, other					
Inbound Waste Volume Allowed Within Truck Limit:	208,000	gal/day							
	INCOMING TRUCK SIZE	% of INCOMING WASTE	# of TRUCKS IN	DAILY INCOMING VOLUME	OUTGOING TRUCK SIZE	DAILY OUTGOING	# of TRUCKS OUT PER	% BACK HAUL	SUBTRACT BACK HAUL TRUCKS PER
WASTE STREAM	(gal)	VOLUME	PER DAY	(gal)	(gal)	VOLUME (gal)	DAY	TRUCKS	DAY
Oil & Gas Sludges (120 bbl trucks)	5,040	50%	20.6	104,000	5,040	104,000	20.6	50%	-10.3
Type A Wastes - Industrial Wastewater Containing Metals (120 bbl trucks)	5,040	10%	4.1	20,800	5,040	20,800	4.1	50%	-2.1
Type B Wastes - Oily Wastewater (120 bbl trucks)	5,040	20%	8.3	41,600	5,040	41,600	8.3	50%	-4.1
Type C Wastes - Industrial Wastewater Containing Organics (120 bbl trucks)	5,040	10%	4.1	20,800	5,040	20,800	4.1	50%	-2.1
Domestic (1,000 gal. in, 6,000 gal. out)	1,000	10%	20.8	20,800	6,000	20,800	3.5	0%	0.0
		100%	57.9	208,000		208,000	40.6		-18.6
	TOTAL TRU	CKS IN + OUT:	80.0						

The truck activity estimate in Table 2 is based on the proposed maximum daily truck limit (all trucks) of 100 and optimistically assumes 50% of the trucks bringing non-domestic waste can be used to back haul treated waste off of the site.

### Table 2: Maximum Daily Truck Activity with 50% Backhaul

Proposed weekly truck limit:	500	trucks (1,000 t	rips) Mon S	Sat.					
Ave. Daily Truck Limit:	83.3								
Ave. Daily Waste Trucks:	80	assume ±3 tru	cks/day for s	upplies, other					
Inbound Waste Volume Allowed Within Truck Limit:	252,200	gal/day							
	INCOMING TRUCK SIZE	% of INCOMING WASTE	# of TRUCKS IN	DAILY INCOMING VOLUME	OUTGOING TRUCK SIZE	DAILY OUTGOING	# of TRUCKS OUT PER	% BACK HAUL	SUBTRACT BACK HAUL TRUCKS PER
WASTE STREAM	(gal)	VOLUME	PER DAY	(gal)	(gal)	VOLUME (gal)	DAY	TRUCKS	DAY
Oil & Gas Sludges (120 bbl trucks)	5,040	50%	25.0	126,100	5,040	126,100	25.0	50%	-12.5
Type A Wastes - Industrial Wastewater Containing Metals (120 bbl trucks)	5,040	10%	5.0	25,220	5,040	25,220	5.0	50%	-2.5
Type B Wastes - Oily Wastewater (120 bbl trucks)	5,040	20%	10.0	50,440	5,040	50,440	10.0	50%	-5.0
Type C Wastes - Industrial Wastewater Containing Organics (120 bbl trucks)	5,040	10%	5.0	25,220	5,040	25,220	5.0	50%	-2.5
Domestic (1,000 gal. in, 6,000 gal. out)	1,000	10%	25.2	25,220	6,000	25,220	4.2	0%	0.0
		100%	70.3	252,200		252,200	49.2		-22.5
	TOTAL TRU	ICKS IN + OUT:	97.0						

Based on the calculations in these tables, it can be shown:

- The average number of incoming waste trucks plus outgoing waste trucks is expected to be approximately 80 trucks per day, and 3 trucks per day for other supply trucks. The maximum number of incoming waste trucks plus outgoing waste trucks is expected to be approximately 97 trucks per day, and 3 trucks per day for other supply trucks.
- Approximately 21 to 25 incoming trucks per day are expected to be hauling domestic waste into the site. These trucks are not required to be sampled to confirm load contents and can travel directly to the domestic waste offloading area. As the Facility proposes to accept waste loads 12 hours per day, this equates to roughly 2 domestic waste trucks per hour. Domestic waste will be bulked into larger trucks for offsite hauling. If the larger outbound domestic waste haul trucks are accounted for (3.5 to 4.2 trucks per day), the total becomes roughly 24.5 to 29.5 domestic trucks per day, which equates to roughly 2 to 2.5 trucks per hour.
- The remaining 37 to 45 incoming trucks hauling non-hazardous waste will be required to have their loads sampled and analyzed to confirm their contents. As the Facility propose to accept waste loads 12 hours per day, this equates to roughly 3.1 to 3.75 trucks per hour that will be staged for sampling. The

on-site lab will be capable of conducting multiple analyses in parallel, so the time to finalize the analyses and approve these loads can be completed in well under an hour. These trucks will be unloading in one of the 4 available offloading bays before or soon after the next waste trucks arrive at the Facility.

• Continuing the calculations from above, 37 to 45 outbound waste trucks per day will be required to remove treated non-hazardous waste from the site. This equates to roughly 3.1 to 3.75 trucks per hour that will be entering the southern entrance on Shell Oil Road and going to the center of the site to load treated non-hazardous waste for hauling offsite. As these trucks are not waiting to have loads sampled and analyzed (wastes will have had lab analysis post treatment) and there are two non-hazardous waste loading points in the area, loading of these waste trucks is expected to take well under an hour.

In summary, during any maximum operating hour there is expected to be on-site:

- Roughly 3 to 4 industrial waste trucks staged by the entrance gate awaiting load sampling and verification;
- 2 to 3 trucks unloading waste at the main offloading area;
- Roughly 3 to 4 industrial waste trucks loading treated industrial waste at the central area of the Facility; and
- Roughly 2 to 3 trucks either loading or unloading domestic waste.

As demonstrated in the operational queuing plan (Figure 1), the narrowest driveway is located near the southern entrance, is approximately 35 feet wide, and is large enough to safely accommodate the proposed traffic activity without lane markings. Please refer to Appendix 1 for the full-size operational queuing plan that shows a number of trucks in line with the estimates discussed above with extra trucks to demonstrate additional queuing capacity.

## 1.3 Safety Measures, Risk, and Outcome

The Facility will employ the following safety measures to reduce the likelihood and/or severity of traffic related risk factors:

- Use of a strict 5 mile per hour speed limit on-site for all vehicles;
- Allowing trucks to use the southern Facility entrance along Shell Oil Road to negate the need for U-turns on-site;
- Use of incoming industrial waste trucks for backhauling of treated industrial waste to reduce the total truck activity on surrounding private roads;
- Use of larger vacuum trucks to ship consolidated domestic waste offsite and reduce the total truck activity;
- Use of a treated waste loading manifold to allow single file loading of up to two industrial waste trucks at one time and maximize available driveway space;
- Use of a Receiving Manager to facilitate truck activity on-site;
- Installation of informational signage on-site to guide traffic patterns and identify loading infrastructure and procedures;
- Scheduling of incoming waste deliveries to prevent excess trucks on-site and queuing on Mission Rock Road. Trucks will be required to arrive at the Facility at their schedule times. Trucks that arrive prior to truck delivery hours (7:00AM Monday to Friday; 8:00AM Saturday) will be allowed to queue inside the front gate, but will be provided a warning to arrive only during truck delivery hours. If warned again, the Truck will no longer be allowed to use the Facility for waste disposal;
- Hazardous materials would be stored in a covered storage area away from virtually all on-site traffic

activity;

- All on-site traffic activity will be ceased during the scheduled hazardous materials deliveries to minimize the risk of potential vehicle collisions with the hazardous materials delivery truck; and
- Use of active, on-site guidance of incoming and outgoing waste deliveries throughout the site to minimize the likelihood of a collision.

The implementation of the above safety measures and use of the existing driveways with adequate widths to accommodate the proposed truck turning radii and activity will reduce the likelihood of traffic collision to minimal levels. Furthermore, the health and environmental severity of a traffic collision on-site would be low due to the low collision speed, non-hazardous nature of waste materials, and existing drainage control features that would contain a potential spill. As a result, the risk level of traffic activity on-site is considered minimal.

# 2.0 INDUSTRIAL AND OILFIELD WASTE

Non-hazardous industrial waste and oilfield waste generators will use the proposed Facility for treatment and disposal of various non-hazardous wastes. For the purposes of this document, both industrial waste and oilfield waste are herein referred to as "industrial waste". To summarize, incoming industrial waste generators will be staged at the front of the site, sampled for laboratory waste verification, and directed to the main offloading area for off-loading of wastes. Off-loaded industrial waste trucks will then either leave the Facility or serve as a back haul truck for transportation of treated industrial waste to an off-site, authorized disposal Facility. Off-site shipping trucks will enter the Facility at the southern entrance along Shell Oil Road, and load treated wastes in the central area of the Facility for disposal off-site. The typical incoming and outgoing liquid industrial waste trucks are summarized in Figure 2. Incoming industrial waste deliveries and outgoing treated industrial waste shipment and back hauling are further discussed in Sections 2.1 and 2.2 below.



**Figure 2: Typical Industrial Waste Trucks** – Typical Incoming and Outgoing Liquid Industrial Waste Truck (5,000-Gallon Vacuum Truck; Left); Typical Incoming Solid Industrial Waste Truck (20-40 Cubic Yard Roll Off Truck; Right); and Typical Outgoing Solid Industrial Waste Truck (25-ton Dump Truck; Bottom).

## 2.1 Industrial and Oilfield Waste Deliveries

Industrial waste generators (i.e., the Facility's customers), including liquid and semi-solid industrial waste, will be required to submit a laboratory profile of their waste streams to ensure the waste is non-hazardous prior to sending it to the Facility for treatment. Preliminarily approved incoming industrial waste will be scheduled with a delivery appointment to prevent truck queuing along Mission Rock Road. The Facility has the capacity to stage up to ten incoming waste delivery trucks at one time; however, as discussed in Sections 1.2 and 2.2, it is expected that only three to four trucks will be staged at one time.

When the incoming waste truck arrives at the Facility at their scheduled time, the truck will be directed to the staging and sampling area at the front of the Facility inside the gate. Signage will be posted to describe the Facility's staging and sampling procedures. A receiving manager will verify the incoming trucks' delivery details, and a waste stream sample will be obtained and analyzed at the proposed in-house laboratory for comparison to the waste profile submitted by the waste generator. The incoming waste will be approved for disposal if the in-house laboratory analysis matches the waste profile submitted by the waste generator.

Once the waste is approved for disposal, the truck will pull forward then back into the main off-loading area in

the southern side of the Facility. The trucks will unload via a hose connected to a piping manifold that leads to waste receiving tanks, as instructed by the receiving manager. Up to four trucks may unload at the main offloading area at one time. If desired by the waste hauler and after unloading, the truck will pull forward then back into the truck wash channel to wash out residual contents with high-pressure water. After washout and if no back hauling is scheduled, the truck will exit the Facility via the southeastern gate along Shell Oil Road and turn left onto Mission Rock Road for departure. Back hauling procedures are discussed in Section 2.2 below.

If the truck is offloading semi-solid industrial waste (e.g., drilling muds and cuttings), it will pull forward from the staging and sampling area then back into the solid waste load out area in the central portion of the Facility. The trucks will unload by dumping their contents into the solid waste load out area, as instructed by the Receiving Manager. If desired by the waste hauler and after unloading, the truck will pull forward then back into the truck wash channel to wash out residual contents with high-pressure water. Then, the truck will pull forward and exit the Facility via the southeastern gate along Shell Oil Road and turn left onto Mission Rock Road for departure.

The industrial waste traffic pattern within the Facility is designed to prevent U-turns on-site. Please refer to Figure 3 for the location of the staging and sampling area, main off-loading area, solid waste load out area, truck wash channel, and industrial waste traffic pattern including the trucks' approximate turning radii. As depicted in the Figure 3, there is ample room for the trucks to navigate within the Facility without risk of collision with stationary equipment or other trucks on-site.

# 2.2 Industrial and Oilfield Waste Off-site Shipping and Back Hauling

Treated, non-hazardous industrial waste will be shipped off-site in both non-back haul trucks and back haul trucks to other offsite disposal facilities. Off-site shipping trucks will enter the Facility at the southern entrance along Shell Oil Road, and load treated wastes in the central area of the Facility for disposal off-site. The trucks will load via a hose connected to a manifold that is hard piped to the treated waste storage tanks; the connection between the loading manifold and waste storage tanks will be run through an existing, below grade channel across the driveway. Please refer to Figure 3 for the location of the industrial waste loading area and loading infrastructure. The loading manifold will allow loading of up to two trucks at once in a single file line; trucks will not be loaded side by side. After loading treated industrial waste, the trucks will pull forward, turn right and exit the Facility at the southeastern gate along Shell Oil Road, then turn left to Mission Rock Road for departure. Please refer to Figure 3 for the traffic pattern for industrial waste shipment trucks.

A back haul truck is an incoming industrial waste truck that offloads its contents as discussed in Section 2.1, and immediately returns to load treated industrial waste on-site for disposal at an off-site disposal Facility. Depending on the need for additional trucks to ship treated industrial waste off-site, the receiving manager will schedule a back haul with an incoming industrial waste truck (i.e., independent contractor) when the waste delivery is scheduled. The back haul operators will not be owned by the applicant in most cases. The receiving manager will coordinate with the waste transporter to identify all back haul trucks.

After unloading the incoming industrial waste, the back haul truck will pull forward, then, if necessary, back into the truck wash channel to wash out residual contents with high-pressure water. The back haul truck will then pull forward and exit the Facility at the southeastern gate along Shell Oil Road, turn right onto Shell Oil Road, then turn right to enter the Facility at the southern gate along Shell Oil Road. The back haul trucks will then load treated industrial waste and exit the Facility as described above. Please refer to Figure 3 for the traffic pattern for industrial waste back haul trucks transporting waste off site (same traffic pattern as non-back haul trucks).

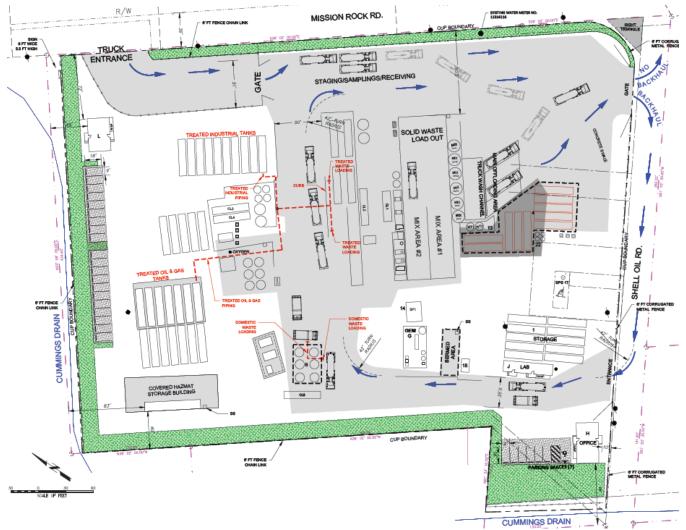


Figure 3: Industrial Waste Queuing Plan

## 3.0 DOMESTIC WASTE

Domestic waste generators will use the proposed Facility for disposal of domestic wastes from septic tanks, portable toilets, etc. To summarize, incoming domestic waste generators will enter the Facility at the northern gate and be directed to the domestic waste loading area for off-loading. Off-loaded domestic waste trucks will then exit the Facility via the southern gate along Shell Oil Road. Please refer to Figure 4 for the typical domestic waste haul trucks. Incoming domestic waste deliveries and outgoing, consolidated domestic waste shipment are further discussed in Sections 3.1 and 3.2 below.



**Figure 4: Typical Domestic Waste Trucks** – Typical Incoming Liquid Domestic Waste Truck (1,200 to 2,000-Gallon) (Left); and Typical Outgoing Liquid Domestic Waste Truck (6,000-Gallon) (Right).

### 3.1 Domestic Waste Deliveries

Incoming domestic waste will be scheduled with a delivery appointment slot to prevent truck queuing along Mission Rock Road. The incoming domestic waste truck will be verified by the Receiving Manager when it arrives at the Facility. The domestic waste generators will not be required to submit a laboratory profile of their waste stream or be sampled for laboratory analysis on-site; thus, domestic waste trucks will be able to off-load in less time than industrial waste trucks. Once the truck is verified, the truck will turn right and proceed towards the domestic waste loading area for off-loading. The trucks will unload their domestic waste via a hose connected to the domestic waste receiving tanks, as instructed by the receiving manager. Domestic waste trucks will not use the truck wash channel. After off-loading, the truck will pull forward and exit the Facility via the southern gate along Shell Oil Road, then turn left onto Mission Rock Road for departure. Please refer to Figure 5 for the location of the domestic waste off-loading area and domestic waste traffic pattern.

## 3.2 Domestic Waste Consolidation and Off-site Shipping

Consolidated domestic waste will be shipped off-site in 6,000-gallon vacuum trucks to other offsite disposal facilities. The domestic waste shipping trucks will have considerably larger tank capacity that the incoming trucks; thus, the domestic truck activity will be considerably reduced. Off-site domestic waste shipping trucks will enter the Facility at the front entrance along Mission Rock Road, and load consolidated domestic waste in the domestic waste loading area of the Facility for disposal off-site. The trucks will load via a hose connected to the domestic waste receiving tanks. After loading consolidated domestic waste, the trucks will turn left and exit the Facility at the southern gate along Shell Oil Road, then turn left to Mission Rock Road for departure. Please refer to Figure 5 for the location of the domestic waste off-loading area and domestic waste traffic pattern.



# Figure 5: Domestic Waste Queuing Plan

# 4.0 HAZARDOUS MATERIALS DEILVERIES

The Facility uses a variety of hazardous materials (chemicals) in the waste treatment process. Hazardous materials will be safely stored in the covered hazardous materials storage building in the northwest corner of the site. A number of the hazardous materials are consumed during the waste treatment process and must be replenished on a monthly basis.

Hazardous material deliveries will occur approximately two to three times per month, and will occur during normal truck delivery hours (Monday through Friday, 7:00 a.m. to 7:00 p.m.; Saturday, 8:00 a.m. to 3:00 p.m.). All on-site traffic activity will be ceased during the scheduled hazardous materials deliveries to minimize the risk of potential vehicle collisions with the hazardous materials delivery truck. The Receiving Manager will guide the hazardous materials truck throughout the site to minimize the likelihood of a collision. The hazardous material delivery truck will enter the Facility at the main entrance, turn right, and navigate to the hazardous materials storage building for offloading. After offloading, the truck will turn left pull forward and exit the Facility at the southern gate along Shell Oil Road, then turn left to Mission Rock Road for departure. Please refer to Figure 6 for the location of the hazardous materials storage building and hazardous material delivery traffic route.

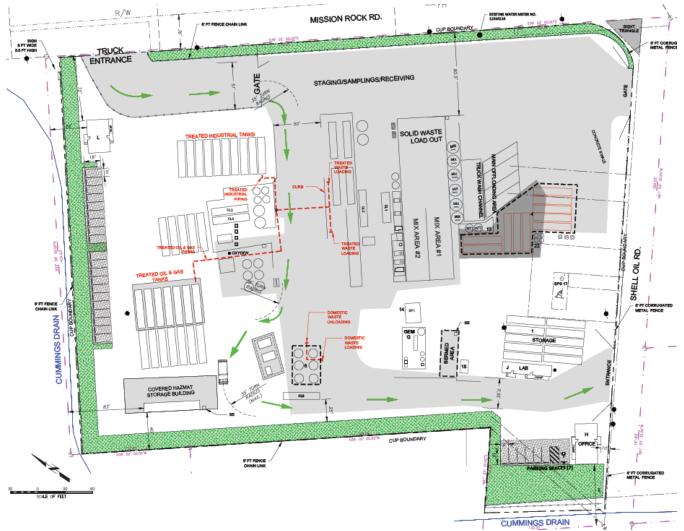
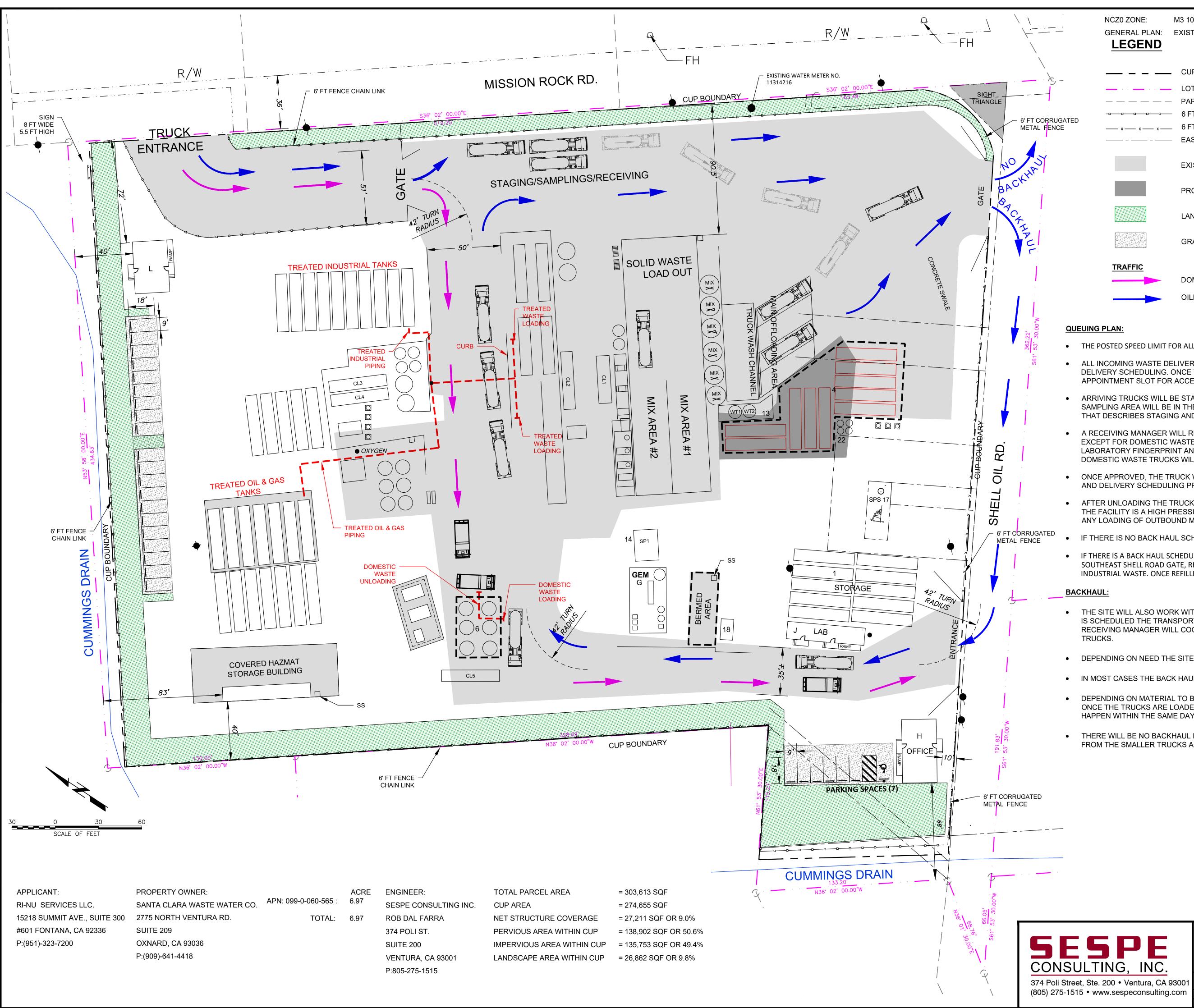


Figure 6: Hazardous Materials Queuing Plan

# **APPENDIX 1**

# **Operational Queuing Plan**



S: \GR10 - Green Compass \CUP Application 2016 - SCWW \CAD \Site Plan \GR10 -RI-NU-Site-Plan-05-12-21_Transportation.dwg May 12, 2021, 3: 36pm GJC

		M3 10,000 SQ. FT. EXISTING COMMUNITY		
<u>}_</u>		CUP BOUNDARY 6.3 ACRE ±	0	FIRE HYDRANT (FH)
^5, -	· · · · · · ·	LOT LINE	-•-	EDISON POWER POLE
-		PARCEL LINE 6 FT HIGH CHAINLINK FENCE		BERM
RUGATED	x x x	6 FT HIGH CORRUGATED METAL FENCE EASEMENTS		"DAY TANK" IN USE CHEMICAL ON CONTAINMENT
			٠	COMPRESSED GAS CYLINDER
		EXISTING AC./CONCRETE	•	ABANDONED OIL WELL
		PROPOSED AC./CONCRETE	$\odot$	ACTIVE OIL WELL
			SS 🗆	SAFETY SHOWER/EYEWASH
		LANDSCAPE AREA		SEWER LINE TO OXNARD
		GRAVEL SURFACE		
	TRAFFIC			
		DOMESTIC TRAFFIC		
		OILFIELD/INDUSTRIAL TRAFFIC		

- THE POSTED SPEED LIMIT FOR ALL TRAFFIC ON SITE WILL BE A MAXIMUM OF 5 MPH.
- ALL INCOMING WASTE DELIVERY TRUCKS WILL BE PRE-APPROVED BASED OFF A PROFILE SUBMITTED PRIOR TO DELIVERY SCHEDULING. ONCE THE PROFILE IS APPROVED, THE MATERIAL WILL BE GIVEN A DELIVERY APPOINTMENT SLOT FOR ACCEPTANCE INTO THE FACILITY.
- ARRIVING TRUCKS WILL BE STAGED AT THE FRONT OF THE FACILITY INSIDE THE GATE. THE TRUCK STAGING AND SAMPLING AREA WILL BE IN THE FRONT OF THE FACILITY INSIDE THE GATE, AND WILL BE MARKED BY SIGNAGE THAT DESCRIBES STAGING AND SAMPLING PROCEDURES.
- A RECEIVING MANAGER WILL REVIEW THE ARRIVING TRUCKS' PAPERWORK TO VERIFY DELIVERY DETAILS. EXCEPT FOR DOMESTIC WASTE TRUCKS, THE ARRIVING TRUCKS' WASTE MATERIAL WILL BE SAMPLED FOR LABORATORY FINGERPRINT ANALYSIS TO VERIFY THE INCOMING WASTE MATCHES THE PRE-APPROVED PROFILE DOMESTIC WASTE TRUCKS WILL BE SENT TO THE DOMESTIC OFFLOADING AREA.
- ONCE APPROVED, THE TRUCK WILL BE DIRECTED TO ITS APPROPRIATE OFF-LOADING AREA. THE PRE-APPROVAL AND DELIVERY SCHEDULING PROCEDURES WILL PREVENT TRUCK QUEUING ON MISSION ROCK ROAD.
- AFTER UNLOADING THE TRUCK WILL BE WASHED OUT IN THE TRUCK WASHOUT CHANNEL. THE WASH OUT AT THE FACILITY IS A HIGH PRESSURE WATER WASH THAT WILL REMOVE ALL THE INCOMING MATERIAL PRIOR TO ANY LOADING OF OUTBOUND MATERIAL.
- IF THERE IS NO BACK HAUL SCHEDULED IT WILL LEAVE THE SITE THROUGH THE SIDE GATE ON SHELL OIL RD.
- IF THERE IS A BACK HAUL SCHEDULED THE TRUCK WILL LEAVE THE OFF LOAD/WASHOUT AREA, EXIT AT THE NEARBY SOUTHEAST SHELL ROAD GATE, RE-ENTER AT SOUTHWEST GATE & MOVE TO THE LOADING AREAS FOR O&G OR INDUSTRIAL WASTE. ONCE REFILLED, TRUCKS WILL LEAVE OUT THE SOUTHEAST GATE ON SHELL OIL RD.

- THE SITE WILL ALSO WORK WITH INDEPENDENT CONTRACTORS FOR BACK-HAULING. WHEN THE INCOMING LOAD IS SCHEDULED THE TRANSPORTER WILL ALSO BE IDENTIFIED AS A POTENTIAL BACK HAUL OPPORTUNITY. THE RECEIVING MANAGER WILL COORDINATE WITH THE TRANSPORTER AND THE SITE TO IDENTIFY ALL BACK HAUL
- DEPENDING ON NEED THE SITE WILL SCHEDULE A BACK HAUL AFTER THE LOAD IS RECEIVED AND WASHED OUT.
- IN MOST CASES THE BACK HAUL OPERATORS WILL NOT BE OWNED BY THE APPLICANT.

CALE: HORIZ. AS SHOWN

03/29/2021

WN BY: G.CAMUS

VERT. AS SHOWN

- DEPENDING ON MATERIAL TO BE BACKED HAULED THE LOADING STATIONS ARE IDENTIFIED ON THE SITE PLAN. ONCE THE TRUCKS ARE LOADED THEY WILL BE SCHEDULED TO OUT BOUND FACILITY, TYPICALLY THIS WILL HAPPEN WITHIN THE SAME DAY.
- THERE WILL BE NO BACKHAUL FOR THE DOMESTIC LOADS COMING IN, THIS MATERIAL WILL BE CONSOLIDATED FROM THE SMALLER TRUCKS AND SENT OUT IN A LARGER TANKER TRUCK.

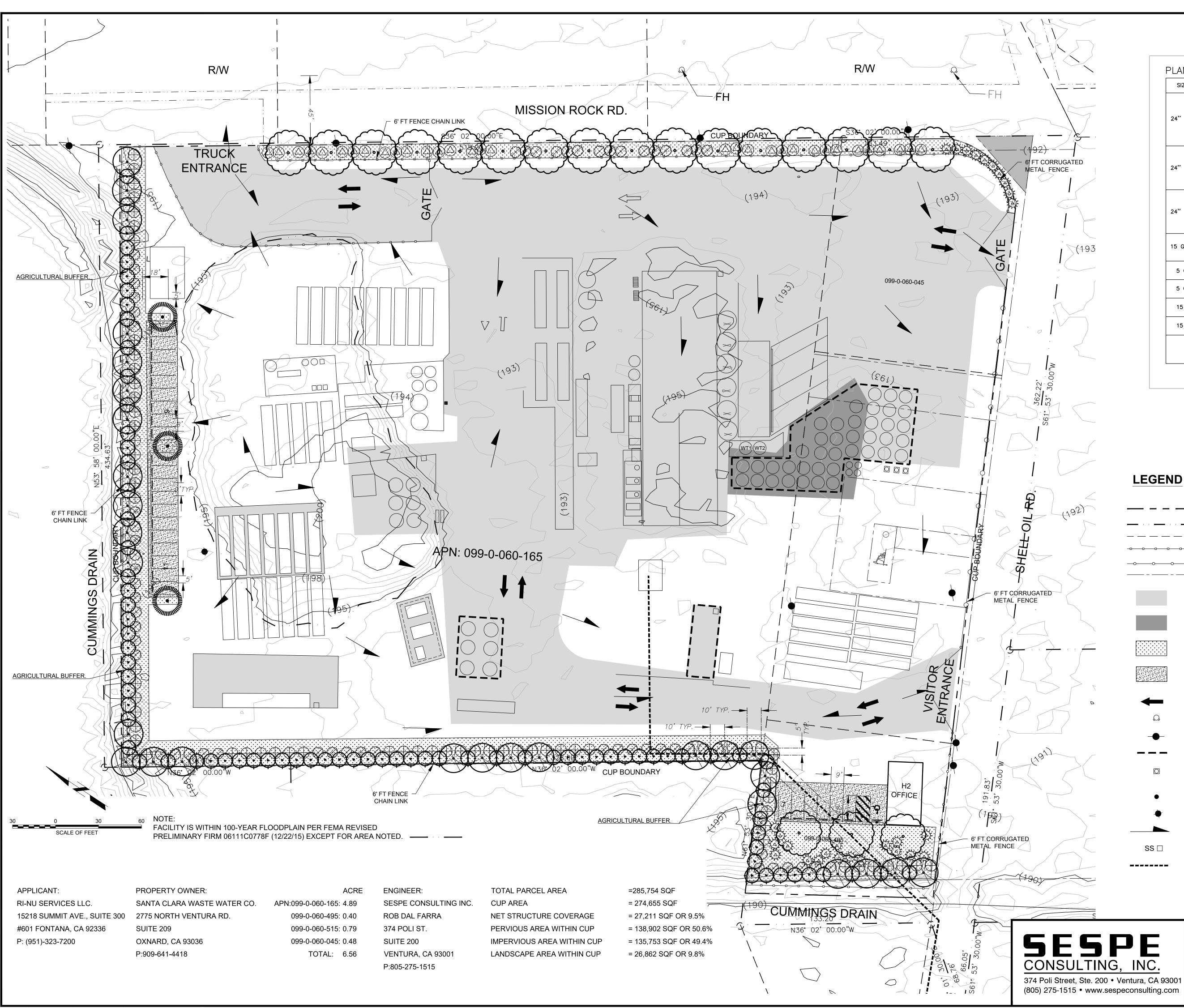
PROJECT SITE ADDRESS: 815 MISSION ROCK RD, SANTA PAULA, CA

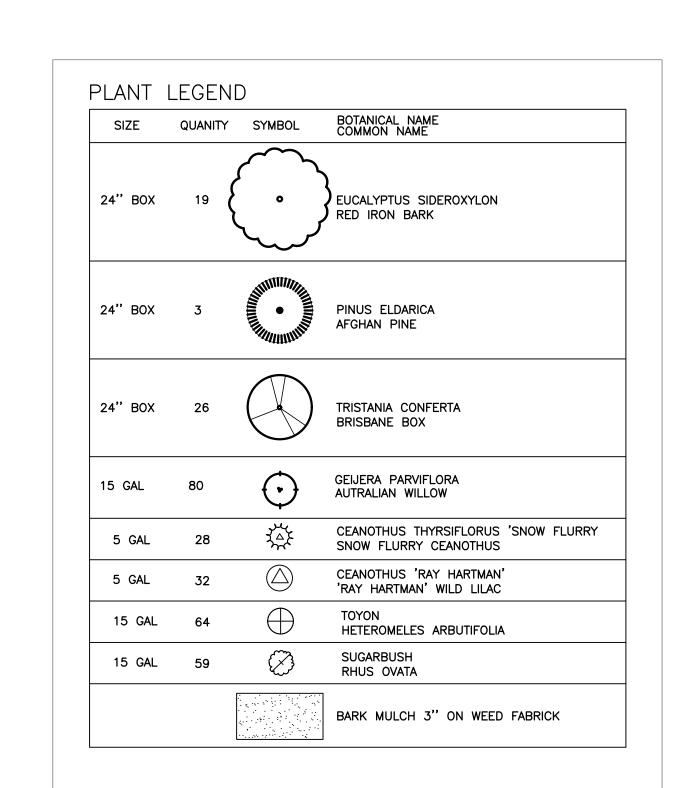
# **RI-NU WASTE WATER** TREATMENT FACILITY **QUEUING PLAN**

ri→nu

Services, LLC.

FIGURE NUMBER





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ri→nu

Environmental Service

# LEGEND

(193

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METAL FENCE

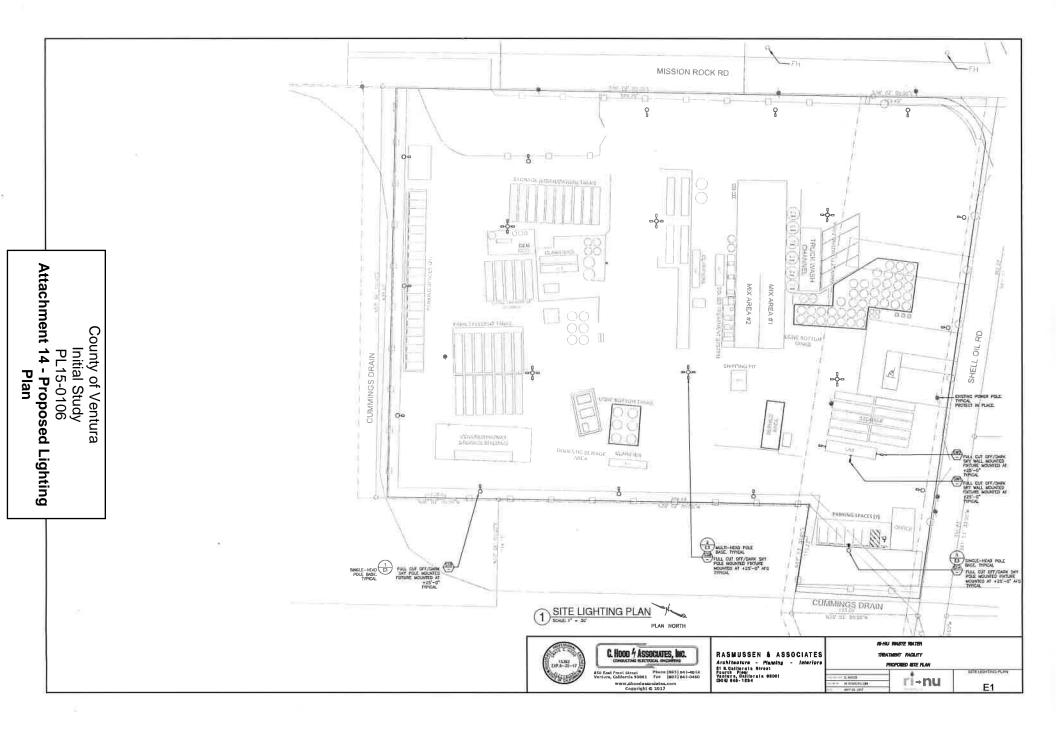
36. 53

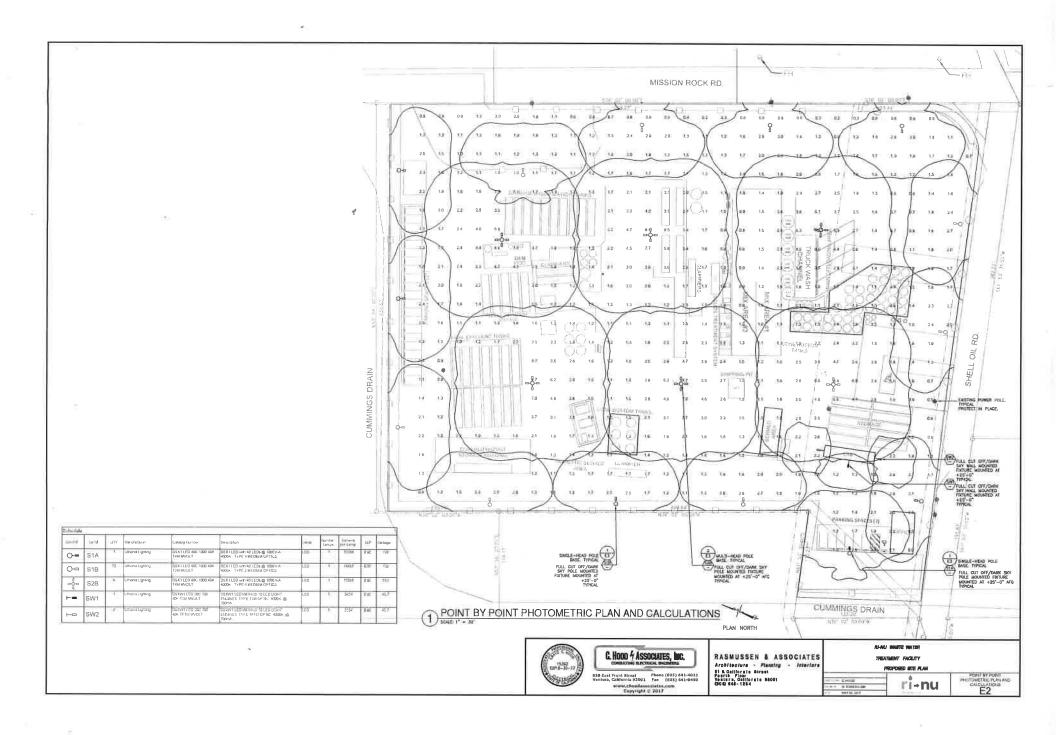
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SHELFOIL		<ul> <li>LOT LINE</li> <li>PARCEL LINE</li> <li>6 FT HIGH CHAINLINK FENCE</li> <li>6 FT HIGH CORRUGATED METAL F</li> <li>EASEMENTS</li> </ul>	FENCE	unty of Ver Initial Stud PL15-010( - Concep
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		PROPOSED AC./CONCRETE		Attachmen
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		GRAVEL SURFACE		Ati
	-	TRAFFIC ARROW		
	$\bigcirc$	FIRE HYDRANT (FH)		
		EDISON POWER POLE		
(191)		BERM		
	$\bigcirc$	"DAY TANK" IN USE CHEMICAL ON CONTAINMENT		
	•	COMPRESSED GAS CYLINDER		
	•	ABANDONED OIL WELL		
		DRAINAGE DIRECTION	JORDAN.	GILBERT & BAIN
ATED	SS 🗆	SAFETY SHOWER/EYEWASH		PE ARCHITECTS, INC.
×190)		SEWER LINE TO OXNARD N = NEW E = EXISTING		ITURA AVE., VENTURA CA 93001 641 FAX (805) 653—7874
			Jordan, Gilbert & Bo	ain Landscape Architects, Inc. 🔘 2016
S		PROJECT SITE ADD	RESS: 815 MISSION	N ROCK RD, SANTA PAULA, CA
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	, IIV.	HORIZ. AS SHOWN	•	FIGURE NUMBER

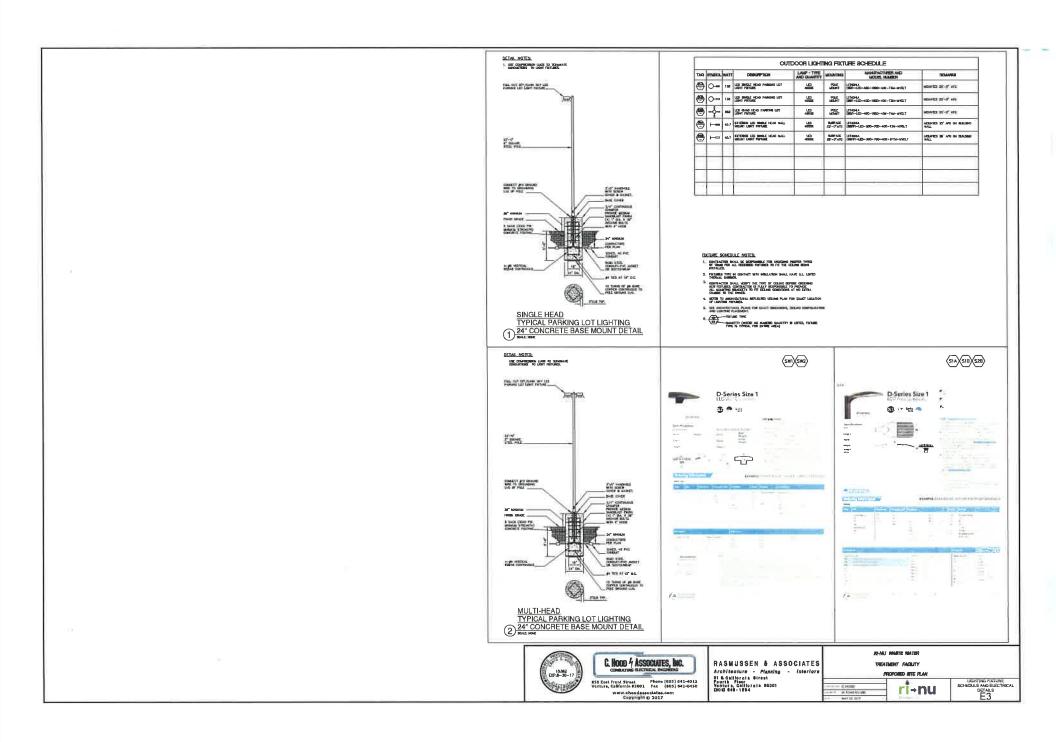
SCALE: HORIZ. AS SHOWN VERT. AS SHOWN

WN BY: T. CHANDLER

November 27, 2018









**Sign Plan Summary** 

Ri-Nu Services, LLC 815 Mission Rock Road Santa Paula, CA 93060

March 2018

Ri-Nu_2018_Sign Plan-fnl.docx

County of Ventura Initial Study PL15-0106 Attachment 15 - Sign Plan and Summary Sespe Consulting, Inc.



# Map Reference #1: Main Facility Sign



Photo taken 1/13/2017. Note: Sign shown above is a mock-up created in Photoshop. Current sign shows "Green Compass".

Dimensions:	3' x 8'	
Height Above Ground:	2' 3"	
Materials:	Plastic sign with wooden 6" diameter posts	
Description:	This sign is facing north adjacent to the main facility entrance along Mission Rock Road (Map Reference #1). The sign curr reads "Green Compass" but will be changed to "Ri-Nu Service LLC" following project approval.	rently

March 2018

# Map Reference #2: Northeast Corner of Site



Dimensions:	1'6" x 2'
Materials:	Metal
Description:	Three (3) identical versions of this sign are posted at the facility, specifically at the main facility entrance (shown above), the back gate, and the front gate. The sign shown above is facing east adjacent to the main facility entrance along Mission Rock Road (Map Reference #2).

Ri-Nu Services, LLC Sign Plan

# Map Reference #2: Northeast Corner of Site



Photo taken 1/13/2017

Dimensions:	10" x 7"
Materials:	Plastic
Description:	Three (3) identical versions of this sign are posted at the facility, specifically at the main facility entrance (shown above), the back gate, and the front gate. The sign shown above is facing east adjacent to the main facility entrance along Mission Rock Road (Map Reference #2).

# Map Reference #3: Facility Entrance Gate



Dimensions:	2' x 1'6"
Materials:	Metal
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

Ri-Nu Services, LLC Sign Plan

# Map Reference #3: Facility Entrance Gate



Dimensions:	10" x 1'2"
Materials:	Metal
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3). Please note, the sign currently reads "SCWW" but will be changed to "Ri-Nu" following project approval.

Ri-Nu Services, LLC Sign Plan

# Map Reference #3: Facility Entrance Gate



Photo taken 1/13/2017

Dimensions:	11" x 8 ½"
Materials:	Metal
Description:	Four (4) identical versions of this sign are posted in various places around the perimeter of the facility. The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

Ri-Nu Services, LLC Sign Plan

# Map Reference #3: Facility Entrance Gate



Dimensions:	10" x 1'2"
Materials:	Metal
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

March 2018

# Map Reference #3: Facility Entrance Gate



Photo taken 1/13/2017

Dimensions:	9 ¼" x 1'2"
Materials:	Metal
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

# Map Reference #3: Facility Entrance Gate



Photo taken 1/13/2017.

Dimensions:	3′ x 12 ¾″
Materials:	Plastic
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

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March 2018

# Map Reference #3: Facility Entrance Gate



Dimensions:	2' x 2'
Materials:	Plastic
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

Ri-Nu Services, LLC Sign Plan

# Map Reference #3: Facility Entrance Gate



Dimensions:	2' x 2'
Materials:	Metal
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

## Map Reference #3: Facility Entrance Gate



Photo taken 1/13/2017,

Dimensions: Materials: Description: 1' x 2'6"

Plastic

The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

Ri-Nu Services, LLC Sign Plan

# Map Reference #3: Facility Entrance Gate



Dimensions:	1' x 2'6"
Materials:	Plastic
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).

Ri-Nu Services, LLC Sign Plan

# Map Reference #3: Facility Entrance Gate

HARD HAT, STEEL TOE BOOTS & SAFET 310

Dimensions:	1' x 8'
Materials:	Plastic
Description:	The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3). Please note, the sign currently reads "SCWW" but will be changed to "Ri-Nu" following project approval.

Ri-Nu Services, LLC Sign Plan

### Map Reference #3: Facility Entrance Gate



Photo taken 1/13/2017.

Dimensions:10" x 1'2"Materials:PlasticDescription:The sign showMaterials:Description:

The sign shown above is posted on the facility entrance gate, off Mission Rock Road (Map Reference #3).