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Waste Management Plan

This section discusses the potential effect on human health and the environment from existing site conditions as well as nonhazardous and hazardous waste generated during construction and operation at the Soda Mountain Solar Project (Project). Section 1.1 describes the environmental setting, site investigations that have been completed at the Project site, and waste that would be generated by the Project. Section 1.2 describes the Regulatory Setting of the Project in terms of waste management. Section 1.3 presents the impact analysis and Section 1.4 presents the cumulative impacts of the project with respect to waste management. Section 1.5 describes the Laws, Ordinances, Regulations, and Standards (LORS) applicable to waste management for the Project. Section 1.6 presents the agencies that have authority over the waste generated at the Project site and specifies the contact at each agency. Section 1.7 describes the permits required for waste generated at the Project site and a schedule for obtaining the permits. Section 1.8 provides the references used to prepare this section.

1.1 Environmental Setting

This subsection summarizes the environmental condition of the Project site. In addition, this subsection describes nonhazardous and hazardous waste streams associated with construction and operation of the Project, along with proximal solid waste disposal facilities and hazardous waste disposal facilities for nonhazardous and hazardous waste, respectively. The following existing conditions are described:

- Results of a Phase I Environmental Site Assessments (ESAs), which were completed for the Project in June 2023, using methods prescribed by the American Society for Testing and Materials (ASTM) document E2247-16 entitled "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property" (ASTM 2016) (see Section 1.1.1).
- A description of each waste stream estimated to be generated during Project construction and operation, including origin, anticipated hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation (see Section 1.1.2).
- A description of waste disposal sites which may feasibly be used for disposal of Project wastes, including the name, location, classification under Title 23, California Code of Regulations, § 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site (see Section 1.1.3).

1.1.1 Site Investigation

1.1.1.1 2023 Phase I ESA Update, Soda Mountain Solar Project, LLC

SWCA Environmental Consultants (SWCA) conducted a Phase I Environmental Site Assessment (ESA) for the Project that focused on 2670-acre property along the east of Interstate 15 (I-15) administered by the Bureau of Land Management in unincorporated San Bernardino County, approximately 6 miles southwest of the town of Baker, California. It is largely vacant desert land accessible by some unimproved roadways and is the proposed site for development of the Soda Mountain Solar Project, LLC. The Phase I ESAs were conducted in general conformance with the requirements of ASTM International Standard *E2247-16 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property* (ASTM, 2016). The phase I ESA identifies the following findings that pertain to waste management:

- SWCA reviewed historical aerial photographs and topographic maps and found that the subject property was vacant desert land throughout the time frame reviewed, from 1933 to 2022. In 1978, a borrow pit is visible in the southwest corner of the subject property. By 1983, the borrow pit appears to be inactive; a gasoline service station is visible southwest of the subject property, but the remaining surrounding properties are vacant desert land. No RECs were identified during the historic review.
- SWCA spoke with Jeffery Childers, Associate Field Manager of the BLM Barstow Field Office, on June 16, 2023, for the current reporting effort. He stated that the subject property is entirely vacant land with no tanks or known releases. He stated that at one point, there were grazing leases on the subject property, but that it had not been grazed in over 10 years.
- Ziad Alaywan, P.E., Project Manager for Soda Mountain Solar Project, LLC, completed a Phase I ESA User Questionnaire regarding the subject property on June 15, 2023. He was not aware of any past uses of the subject property other than desert land. He is unaware of any spills or environmental cleanups that have taken place at the subject property.
- SWCA's review of a June 15, 2023, EDR database search report and supplemental records from federal and state regulatory databases found the following:
    - The subject property was not identified in any relevant listings.
    - Rasor Road Service, Inc., mapped on the subject property by EDR but physically adjoining the west side of the subject property at 66150 Rasor Road, is listed on the following databases: HWTS, USTs, CERS HAZ WASTE, CERS TANKS, EMI, San Bernardino County Permits, and CERS. The HWTS database indicates the site is designated as an inactive, permanent gasoline service station. The facility contains an unspecified number of USTs associated with a gasoline service station. No leaking USTs have been reported at this facility. The CERS database identifies this facility as a chemical storage facility. Multiple CERS violations are noted at this facility, including failure to test leak detection equipment every 12 months, failure to obtain a UST construction permit and plan approval, failure to maintain UST records, failure to comply with any of the applicable requirements of the permit, failure to maintain secondary containment, among others. All violations except one are noted as returned to compliance. The most recent violation was issued on March 4, 2022, during secondary containment certification for fill sump failure during testing. The facility is required to submit a scope of work for the repairs for

all failures that were recorded during the certification. Because of the location with respect to the subject property and the status of the listings, and because testing as recently as March 2022 would have likely identified potential leaks, this is not considered a REC for the subject property.

- No gas transmission pipelines are mapped on or near the subject property. One hazardous liquid pipeline that possibly will be crossed by the proposed generation-tie line is mapped west of I-15. No pipeline incidents (gas) or accidents (liquid) are reported on or near the subject property.

The findings of the Phase I ESA indicate that there are no reasons to suspect that contamination of soil on Project site has occurred, and therefore, soil excavated during construction of the Project has been classified as nonhazardous in Table A: Potential Waste Streams Generated During Construction.

1.1.2 Project Waste Generation

This section identifies nonhazardous waste, hazardous waste, and wastewater that would be generated at the Project site during construction and operation activities.

A majority of the waste that is expected to be generated during both construction activities and operational activities associated with the Project would be classified as nonhazardous waste; however, it is anticipated that some hazardous waste would be generated. The types of construction waste and their estimated quantities are presented in Table A on the following pages. The types of operational waste and their estimated quantities are presented in Table B in the following pages.

Table A: Potential Waste Streams Generated During Construction

Waste Stream	Origin	Classification	Chemical Composition	Est. Quantity Generated	Frequency	Max Quantity Stored at Given Time	Disposal Method
Concrete	General Construction	Nonhazardous	Concrete	< 16 tons	Total Project Construction Duration = TPCD (18 months)	< 1 ton	Recycle or Class II/III landfill
Excavated soil	Excavation, trenching	Nonhazardous	Soils	449,900 cubic yards (CYs)	TPCD	< 25,000 CYs	On-site re-use or Class II/III landfill
Scrap metal	Construction of infrastructure	Nonhazardous	Metal	< 65 tons	TPCD	< 4 tons	Recycle or Class II/III landfill
Cardboard	Packaging	Nonhazardous	Paper	337 tons	TBD	< 19 tons	Recycle or Class II/III landfill
Office waste	Administrative work	Nonhazardous	Paper, plastic	108 tons	TPCD	< 6 tons	Recycle or Class II/III landfill
Solar panel waste [(1)] (Qcell or equivalent)	Construction of solar arrays	Hazardous	Glass, plastic, metal, lead	< 2 tons	TPCD	< 0.2 tons	Recycle or disposal by certified contractor
Battery Energy Storage System Waste	Faulty or damaged lithium batteries	Hazardous	Metal, plastic, lithium	< 2 tons	TPCD	< 0.2 tons	Recycle or disposal by certified contractor
Sanitary waste	Portable restrooms, handwashing	Nonhazardous	Biological liquid/solid	27 tons	TPCD	< 1.5 tons	Off-site treatment/disposal by contractor
Process Water	Washing of equipment, dust suppression	Nonhazardous	Water, dirt	< 300,000 gal	TPCD	< 17,000 gal	Evaporation
Waste oil	Heavy equipment maintenance	Hazardous	Hydrocarbon	< 500 gal	TPCD	< 28 gal	Recycle/disposal by certified contractor
Miscellaneous solvents (paint, adhesives)	Equipment maintenance	Hazardous	Water, organics, inorganics	< 100 lbs.	TBD	< 6 lbs.	Recycle or disposal by certified contractor

Table A: Potential Waste Streams Generated During Construction

Waste Stream	Origin	Classification	Chemical Composition	Est. Quantity Generated	Frequency	Max Quantity Stored at Given Time	Disposal Method
Fuels	Vehicles, generators, heavy equipment	Hazardous	Hydrocarbon	< 50 gal	TPCD	< 3 gal	Recycle
Oil filters	Vehicles, generators, heavy equipment	Hazardous	Hydrocarbons, cellulose, glass, polyester	< 800 lbs.	TPCD	< 50 lbs.	Recycle or disposal by certified contractor
Oily rags/sorbents	Spill cleanup	Hazardous	Hydrocarbons,peat, clay,cotton	< 1000 lbs.	TPCD	< 60 lbs.	Recycle or disposal bycertified contractor
Spent lead acid batteries	Battery operated equipment	Hazardous	Heavy metal	< 1000 lbs.	TBD	< 60 lbs.	Recycle or disposal by certified contractor
Spent alkaline batteries	Battery operated equipment	Hazardous	Metals	< 300 lbs.	TPCD	< 20 lbs.	Recycle or disposal at universal waste facility
Aerosol cans	Equipment maintenance	Hazardous	Hydrocarbons	< 500 lbs.	TPCD	< 30 lbs.	Recycle or disposal by certified contractor

1) Solar cell designation as a hazard material determined by Qcell (current anticipated solar panel to be installed) SDS which states product has a 1% lead content, which is equivalent to 10,000 PPM. According to DTSC, total threshold limit for lead is 1,000 PPM. The exact model solar cell to be installed could change as needed to a panel of equivalent construction and function.

Table B: Potential Waste Streams Generated During Operation

Waste Stream	Origin	Classification	Chemical Composition	Est. Quantity Generated Annually	Frequency	Max Quantity Stored at Given Time	Disposal Method
Scrap metal	Miscellaneous O&M projects	Nonhazardous	Metal	< 500 lbs.	Annually	< 30 lbs.	Recycle or Class II/III landfill
Office waste	Administrative work	Nonhazardous	Paper, plastic	< 30,000 lbs.	Annually	< 2000 lbs.	Recycle or Class II/III landfill
Solar panel waste (Qcell or equivalent)	Solar array operation and maintenance	Hazardous	Glass, plastic, metal, lead	< 500 lbs. (< 6 solar panel failures)	Annually	< 30 lbs.	Recycle or disposal by certified contractor
Battery Energy Storage System Waste	Spent lithium batteries	Hazardous	Metal, plastic, lithium	< 1000 lbs.	Annually	< 60 lbs.	Recycle or disposal by certified contractor
Substation waste	Transformer maintenance	Hazardous	Metal, oil	< 500 lbs.	Annually	< 30 lbs.	Recycle or disposal by certified contractor
Switchyard waste	Switchyard maintenance	Hazardous	Metals	< 500 lbs.	Annually	< 30 lbs.	Recycle or disposal by certified contractor
Sanitary waste and wastewater	Sinks, toilets	Nonhazardous	Water	< 8000 lbs.	Annually	< 500 lbs.	Septic system
Panel washing water	Washing of array panels	Nonhazardous	Water, dirt	750,000 gal	Annually	< 45,000 gal	Evaporation
Waste oil	Heavy equipment maintenance, dielectric fluid	Hazardous	Hydrocarbon	100 gal	Annually	< 6 gal	Recycle or disposal by certified contractor
Miscellaneous solvents (paint, adhesives)	Equipment maintenance	Hazardous	Water, organics, inorganics	< 25 gallons	Annually	< 2 gal	Recycle or disposal by certified contractor
Welding materials	Infrastructure maintenance	Hazardous	Metal	< 250 lbs.	Annually	< 20 lbs.	Recycle or disposed of in class I landfill

Table B: Potential Waste Streams Generated During Operation

Waste Stream	Origin	Classification	Chemical Composition	Est. Quantity Generated Annually	Frequency	Max Quantity Stored at Given Time	Disposal Method
Oil filters	Vehicles, equipment	Hazardous	Hydrocarbons, cellulose, glass, polyester	< 50 lbs.	Annually	< 3 lbs.	Recycle or disposal by certified contractor
Oily rags/sorbents	Spill cleanup	Hazardous	Hydrocarbons, peat, clay, cotton	< 100 lbs.	Annually	< 6 lbs.	Recycle or disposal by certified contractor
Spent lead acid batteries	Battery operated equipment	Hazardous	Heavy metal	< 200 lbs.	Annually	< 12 lbs.	Recycle or disposal by certified contractor
Spent alkaline batteries	Battery operated equipment	Hazardous	Metals	< 25 lbs.	Annually	< 2 lbs.	Recycle or disposal at universal waste facility
Aerosol cans	Equipment maintenance	Hazardous	Hydrocarbons	< 10 lbs.	Annually	< 1 lb.	Recycle or disposal by certified contractor

Sources: CATL (n.d.), Qcells North America (n.d.)

1.1.3 Waste Disposal

This section describes the waste disposal facilities that may feasibly be used for disposal and recycling of waste generated by the Project.

1.1.3.1 Solid Waste Disposal

Nonhazardous solid waste would generally be recycled or disposed of at a Class II/III landfill. The Project would employ third parties to manage appropriate handling and disposal of nonhazardous solid waste. Table C on the following page summarizes the 3 active permitted class III solid waste disposal facilities within a 100 mile radius of the Project site that accept construction/demolition solid waste and/or soil waste. The table includes data on daily throughput, permit capacity, remaining capacity, and total number of enforcement actions from state or local agencies on record.

It should be noted the disposal facility list excludes four disposal facilities that are within the stated radius to Project site. One facility, Wells Cargo landfill in Clark County NV, was excluded from this list despite proximity to Project site, as information regarding the landfill's throughput was unavailable online and the facility did not respond to a request for permit information on accepting out of county/state waste. Two disposal facilities, Landers Landfill and San Timoteo Landfill, were excluded as according to the San Bernardino County Department of Public Works (SBCDPW), the facilities do not accept either C&D or soil waste. The California Street Landfill is excluded from this list as this facility is not managed by San Bernardino County, and confirmation regarding waste categories received was not received.

Barstow Sanitary Landfill is an approximately 645-acre active solid waste disposal facility that accepts Class III waste, including biosolids, mixed municipal, industrial, construction/demolition, and agricultural wastes. According to the SBCDPW, the Barstow Sanitary Landfill does not accept soil. Currently, only 331 acres of the land are permitted for solid waste management. The permit capacity for the facility is 80,354,500 cubic yards (CYD), and as of May 2024, the facility has approximately 71,481,660 CYD of remaining capacity. The max permitted throughput for the facility is 1,500 tons per day (TPD). The facility has three recorded violations of minimum state standards, which are noted in Table D on the following pages.

Victorville Sanitary Landfill is an approximately 491-acre active solid waste disposal facility that accepts Class III waste, including wood waste, tires, biosolids, mixed municipal, industrial, construction/demolition, and agricultural wastes. According to the SBCDPW, the Victorville Sanitary Landfill does accept soil. Currently, only 331 acres of the land are permitted for solid waste management. The permit capacity for the facility is 93,400,000 CYD, and as of May 2024, the facility has approximately 79,400,000 CYD of remaining capacity. The max permitted throughput for the facility is 3,000 TPD. The facility has four recorded enforcement actions by state and local regulatory agencies, which are noted in Table D on the following pages.

Mid-Valley Sanitary Landfill is an approximately 498-acre active solid waste disposal facility that accepts Class III waste, including wood waste, tires, mixed municipal, inert, industrial, green material, dead animal, contaminated soil, construction/demolition, and agricultural wastes. According to the SBCDPW, the Mid-Valley Sanitary Landfill does accept soil. Currently, 408 acres of the land are permitted for solid waste management. The permit capacity for the facility is 101,300,000 CYD, and as of May 2024, the facility has approximately 54,219,377 CYD of remaining capacity. The max permitted throughput for the facility is 1,750 TPD. The facility has five recorded enforcement actions by state and local regulatory agencies, which are noted in Table D on the following pages.

All of the aforementioned recommended solid waste disposal facilities are under the jurisdiction of San Bernardino County Solid Waste Management Division. The bulk of nonhazardous waste to be disposed of as part of Project development is anticipated to be soil. The following table and information were provided by the San Bernardino County Solid Waste Management Division detailing sampling and analysis that must occur prior to transport and disposal of soil from Project site to any landfill in county.

Soil Disposal Sampling Requirements

Cubic Yards (CY) of Soil	Number of Samples
Less than 20	1*
20 to 100	2
101 to 500	4
501 to 2,500	6
2,500 to 20,000	1 additional sample for every 500 CY over 2,500 CY
Greater than 20,000	1 additional sample for every 2,000 CY over 20,000 CY

For quantities greater than 20 CY, at least ten percent of soil samples shall be collected and analyzed for the following:

- TPH as C_4-C_{12}, TPH as C_{13}-C_{22}, and TPH as C_{23}-C_{40} (EPA Method 418.1)
- CAM 17 Metals (SW846-6010)
- VOCs (EPA 8260) and SVOCs (EPA8270)
- pH (EPA 9045C)
- Chlorinated Herbicides (EPA 8150)
- Organochlorine Pesticides (EPA 8081) and PCBs (EPA 8082)
- pH (EPA 9045C)

Table C: Solid Waste Disposal Facilities Proximal to Project Site

Facility	Location	Class	Permitted Capacity (CYD)	Remaining Capacity (CYD)	Permitted Throughput (TPD)	Estimated Closure Date	Enforcement Actions Noted	Accepts C&D Waste	Accepts Soil
Barstow Landfill	32553 Barstow Rd. Barstow, CA 92311	III	80,354,500	71,481,660.00	1,500.00	5/1/2071	3	Yes	No
Victorville Landfill	18600 Stoddard Wells Road Victorville, CA 92307	III	93,400,000	79,400,000.00	3,000.00	10/1/2047	4	Yes	Yes
Mid-Valley Landfill	2390 N. Alder Avenue Rialto, CA 92377	III	101,300,000.00	54,219,377.00	7,500.00	4/1/2045	5	Yes	Yes

Source: Department of Public Works San Bernardino County and CalRecycle Solid Waste Information System (SWIS) database
https://www2.calrecycle.ca.gov/SolidWaste/Site/Search
CYD = cubic yards

TPD = tons per day

Table D: Summary of Solid Waste Disposal Facility Enforcement Actions

Facility	Enforcement Action Number	Program	Regulation Number	Regulation Title	Issued	Final Compliance
Barstow Landfill	2009-011655-NOI	State	20921	Gas Monitoring and Control	8/5/2009	12/3/2009
	1996-000264-NOI	State	17535	Litter Control	4/24/1996	5/17/1996
	1994-000164-NAO	LEA	44004	Significant Change	11/15/1994	5/12/1995
Victorville Landfill	2010-011686-NOI	State	20921	Gas Monitoring and Control	1/13/2010	1/14/2010
	1997-000674-NAO	LEA	44004	Significant Change	10/3/1997	8/13/1998
	1997-000646-NAO	LEA	44004	Significant Change	6/11/1997	9/3/1997
	1994-000172-NAO	LEA	44004	Significant Change	11/15/1994	5/11/1995
Mid-Valley Landfill	1997-000650-NAO	LEA	44004	Significant Change	10/24/1997	11/3/1997
	1997-000491-NOI	State	17711	Litter Control	1/17/1997	2/4/1997
	1996-000429-NOI	State	17676	Confined Unloading	8/26/1996	9/19/1996
	1996-000346-NAO	LEA	44004	Significant Change	6/18/1996	11/3/1997
			18255	Submittal of Plans		
	1994-000165-NAO	LEA	44004	Significant Change	11/15/1994	3/1/1995

Source: CalRecycle Solid Waste Information System (SWIS) database
https://www2.calrecycle.ca.gov/SolidWaste/Site/Search

1.1.3.2 Hazardous Waste Disposal

Hazardous waste generated at the Project site would be stored on-site in accordance with the accumulation limits detailed in Title 22, CCR, section 66262.34 and would be transported to a treatment, storage, and disposal facility (TSDF) by a licensed hazardous waste transporter. According to California's Department of Toxic Substances Control (DTSC), 70 facilities in California accept wastes such as batteries, used oil, solvents, and other hazardous wastes, for treatment, recycling, or disposal (DTSC, n.d. -d). California has two active hazardous waste (Class I) landfills for permanent disposal: 1) Chemical Waste Management, Inc. Kettleman Hills Facility, and (2) Clean Harbors Buttonwillow Landfill.

Chemical Waste Management, Inc. Kettleman Hills Facility is an approximately 1,600-acre hazardous waste TSDF that accepts Class I and II waste, with the exception of radioactive materials, medical waste, compressed gas cylinders, and explosives. Currently, 695 acres of land are available and permitted for waste management activities (Waste Management, Inc, n.d.). The B-18 hazardous waste landfill is planned for expansion. A new hazardous waste landfill (B-20) is planned to open after B-18 reaches capacity and will operate for approximately 24 years. As of February May 20th, 2024, B-18 (Class I/II) has a permitted capacity of 10.7 million cubic yards and a total remaining capacity of 15.6 million cubic yards (CalRecycle, n.d. -d). It is anticipated that hazardous waste generated at the Project site would be accepted at the Kettleman facility.

Clean Harbors Buttonwillow is a 320-acre facility with an operating area of 160-acres and is permitted to accept waste until 2040 (CalRecycle, n.d. -d). The Buttonwillow facility has a permitted capacity of 13.25 million cubic yards and can accept up to 10,500 tons per day (CalRecycle, n.d. -d). The remaining capacity at the Buttonwillow facility is not publicly available. Buttonwillow is permitted to manage Resource Conservation and Recovery Act (RCRA) hazardous waste, California hazardous waste, and nonhazardous waste for stabilization treatment, solidification, and landfill. The landfill accepts waste in bulk (solids and liquids) and in containers.

Typical waste streams include nonhazardous soil, California hazardous soil, hazardous soil for direct landfill, hazardous waste for treatment of metals, plating waste, hazardous and nonhazardous liquid, and debris for microencapsulation (CalRecycle, n.d. -d, DTSC, n.d. - b). It is anticipated that hazardous waste generated at the Project site would be accepted at the Buttonwillow facility.

1.2 Regulatory Setting

A review of existing relevant laws, ordinances, regulations, and standards (LORS) was conducted to understand the regulatory context regarding waste management for the Project. This review of applicable federal, state, and local policies and regulations includes the RCRA, the Clean Water Act, California Environmental Quality Act (CEQA), San Bernadino County's General Plan, San Bernadino County Code of Ordinances, and the San Bernadino County Multi- Jurisdictional Hazard Mitigation Plan. These are detailed in Section 1.5.

1.3 Impact Analysis

The following subsections discuss the potential direct and indirect impacts related to waste management from construction and operation (including maintenance) of the Project.

1.3.1 Methodology

To identify and assess potential impacts related to waste management, Michael Baker International Inc. reviewed the Phase I ESA, as well as publicly available information, including the:

- DTSC EnviroStor
- List of "active" Cease and Desist Orders and Cleanup Abatement Orders
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.
- Location of schools, public airports, private airstrips, residential neighborhoods, and commercial entities that are nearest to the Project site and closest incorporated area (Baker, CA).
- Federal, state, and local regulations related to hazardous materials storage, transport, and disposal that the Project would have to comply with in order to confirm the feasibility of those regulations.

1.3.2 Impact Evaluation Criteria

The potential for impacts to waste management was evaluated using the criteria described in Appendix G of the California Environmental Quality Act (CEQA) Guidelines (California Natural Resources Agency, 2016). Appendix G Section 8 Hazards and Hazardous Materials poses 8 questions meant to encourage thoughtful assessment of impacts from a project which are presented below, which have been used criteria for determination of environmental impact.

Impact WM-1

Threshold:	a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? **The Project would require the transport, use, and disposal of hazardous materials, and would follow all applicable laws, ordinances, regulations, and standards required for hazardous waste related activities, and therefore, is anticipated that the Project would have a less than significant impact with respect to this criterion. This criterion is addressed in detail in the following subsections 1.3.2.1 - 1.3.2.4.**

Impact WM-2

Threshold:	b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? T**his criterion is applicable to this impact analysis as hazardous waste materials will be handled, transported, and disposed of on-site. The Project would take measures to reduce/eliminate the risk of accident conditions resulting in a release of hazardous materials into the environment, and therefore, it is anticipated that the Project would have a less than significant impact with respect to this criterion. This criterion is addressed in detail in the following subsections 1.3.2.1 - 1.3.2.4.**

Impact WM-3

Threshold:	c) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? **The Project site would not be located within one-quarter mile of an existing or proposed school and therefore, there is no impact with respect to this impact criterion.**

Impact WM-4

Threshold:	d) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? **The Project site would not be located on a site which is included on a list of hazardous materials sites, and therefore, there is no impact with respect to this impact criterion.**

Impact WM-5

Threshold:	e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the project area? **The Project site would not be located within an airport land use plan or within two miles of a public airport/public use airport, and therefore, there is no impact with respect to this impact criterion.**

Impact WM-6

Threshold:	

	f) For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the project area? **The Project site would not be located within the vicinity of a private airstrip, and therefore, there is no impact with respect to this impact criterion.**

Impact WM-7

Threshold:	g) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? **The land proposed for Project development is undeveloped and not proximal to any major developments. It is anticipated that the Project would have no impact with respect to this impact criterion.**

Impact WM-8

Threshold:	h) Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? **The Project site is undeveloped and not proximal to any residential dwellings. It is anticipated that the Project would have no impact with respect to this impact criterion.**

The Project would implement the following measures related to hazardous waste storage, collection, and disposal, and waste minimization during both construction and operation of the Project.

- A site-specific United States Environmental Protection Agency (USEPA) identification number and hazardous waste generator classification would be obtained for the Soda Mountain Solar Project. Hazardous waste generated at the Project site would be stored on-site in accordance with accumulation time limits detailed in Title 22, CCR, section 66262.34 before off-site disposal, treatment, or recycling. The hazardous waste storage time limit for large quantity generators (LQGs) is 90 days starting from the first day that waste is generated.
- Tables A and B in section 1.1.2 Project Waste Generation detail management and disposal methods, as well opportunities for re-use and recycling, of each proposed waste stream for the construction and O&M phases of the Project.
- Hazardous wastes would be accumulated at the Project site according to the Title 22 California Code of Regulations (CCR) requirements for satellite waste accumulation. Hazardous wastes would not be stored off-site. All hazardous wastes would be transferred directly from on-site storage to certified hazardous waste disposal sites proximal to Project site.
- Hazardous wastes would be stored in appropriately segregated storage areas surrounded by berms to contain leaks and spills. The bermed areas would be sized to hold the full contents of the largest single container and, if outdoors and not roofed, would be sized for an additional volume for the rainfall associated with a 25-year, 24-hour storm event. If indoors, the containment would be sized for an additional volume equivalent to 20 minutes of the design flow of any fire protection water. These areas would be inspected weekly.
- Hazardous wastes would be collected by a licensed hazardous waste hauler using a hazardous waste manifest. Wastes would be transported to authorized hazardous waste management

facilities. Copies of manifests, reports, waste analyses, and other documents would be kept on-site and would remain accessible for inspection for at least 3 years.

- Employees would be trained in hazardous waste procedures, spill contingencies, and waste minimization. All contractors and workers would be educated about waste sorting, appropriate recycling storage areas, and how to reduce landfill waste.
- Procedures would be developed to reduce the quantity of hazardous waste generated. Some examples of general methods/procedures that would be used to minimize hazardous and nonhazardous waste generation include the following:
    - Procedures for identifying nonhazardous alternatives for materials necessary for the Project. Nonhazardous materials would be used instead of hazardous materials whenever practical, and those nonhazardous wastes would be recycled whenever practical.
    - Procedures to ensure adequate training and performance by labor force would be developed to help minimize errors during waste generating construction and O&M activities, thus minimizing waste generated by for the Project overall.
    - Procedures around ensuring orders of materials are the correct size, type, and amount for the purposes of the Project. In the event that the incorrect materials are purchased, or materials are purchased in excess of Project needs, procedures would be in place to identify materials that can be returned or repurposed.
    - Procedures around proper storage of materials on-site so as to minimize risk of damage, volatilization, degradation, precipitation, cutting, splitting, spilling, or any other physical or chemical processes that would otherwise render the materials unsuitable for purposes of the Project.
    - Procedures to allow for selection of preferred vendors with policies in place to minimize waste generation, including transport of materials on reusable or recyclable pallets and selection of products with minimal waste packaging,
- Construction materials would be sorted on-site throughout construction and transported to appropriate waste management facilities. Recyclable materials would be separated from non-recyclable items and stored until they could be transported to a designated recycling facility. Recycling would be in accordance with applicable California state requirements. Wooden construction waste (such as wood from wood pallets) would be sold, recycled, or chipped and composted. Other compostable materials, such as vegetation, may also be composted off-site.
- No waste treatment is expected to occur on-site during the construction phase of the project. A small septic system would be installed and used for treatment of any wastewater generated from support infrastructure, which should largely include sanitary waste. Any wastewater that cannot be treated adequately by the septic system would be collected and treated or disposed of off-site by a qualified contractor.

The following subsections describe the Project's impacts regarding construction and operational hazardous and nonhazardous waste generation.

1.3.2.1 Solar Facility, Step-Up Substation, and Gen-Tie Line

Construction

Less than Significant Impact. As indicated in Table A, construction of the solar facility, step-up substation, and generation tie in (Gen-Tie) line components would generate both hazardous and nonhazardous construction waste. Hazardous construction waste would be stored on-site for less than 90 days and would be transported to a TSDF by a licensed hazardous waste transporter. Hazardous construction waste is anticipated to be accepted by Chemical Waste Management, Inc. Kettleman Hills Facility and/or Clean Harbors Buttonwillow Landfill. Nonhazardous construction waste would be recycled or disposed of at a Class II/III landfill, 6 of which exist within a 100-mile radius of the Project site. The Project would employ third parties to manage appropriate handling and disposal of nonhazardous solid waste. Considering there are multiple locations that would accept anticipated construction waste streams, and the solid waste landfills listed in Table C would have a collective remaining capacity of over 228 million cubic yards, waste generated from construction of the solar facility, step-up substation, and gen-tie line components would not exceed the capacity of surrounding accepting facilities. Therefore, Project construction would have a less than significant impact involving solid waste recycling, disposal capacity, and impaired attainment of solid waste reduction goals.

Operation

Less than Significant Impact. As indicated in Table B, operation of the solar facility, substation, and gen-tie line components would generate both hazardous and nonhazardous waste. Hazardous operational waste would be stored on-site for less than 90 days and would be transported to a TSDF by a licensed hazardous waste transporter. Hazardous operational waste is anticipated to be accepted by Chemical Waste Management, Inc. Kettleman Hills Facility and/or Clean Harbors Buttonwillow Landfill. Nonhazardous operational waste would be recycled or disposed of at a Class II/III landfill, 6 of which exist within a 100-mile radius of the Project site. The Project would employ third parties to manage appropriate handling and disposal of nonhazardous solid waste. Considering there are multiple locations that would accept anticipated operational waste streams, and the solid waste landfills listed in Table C have a collective remaining capacity of over 228 million cubic yards, waste generated from operation of the solar facility, step-up substation, and gen-tie line components would not exceed the capacity of surrounding accepting facilities. Therefore, Project operation would have a less than significant impact involving solid waste recycling, disposal capacity, and impaired attainment of solid waste reduction goals.

1.3.2.2 Battery Energy Storage System (BESS)

Construction

Less than Significant Impact. As indicated in Table A, construction of the Battery Energy Storage System (BESS) component would generate both hazardous and nonhazardous construction waste. Hazardous construction waste would be stored on-site for less than 90 days and would be transported to a TSDF by a licensed hazardous waste transporter. Hazardous construction waste is anticipated to be accepted by Chemical Waste Management, Inc. Kettleman Hills Facility and/or Clean Harbors Buttonwillow Landfill. Nonhazardous construction waste would be recycled or disposed of at a Class II/III landfill, 6 of which exist within a 100-mile radius of the Project site. The Project would employ third parties to manage appropriate handling and disposal of nonhazardous solid waste. Considering there are multiple locations that would accept anticipated construction waste streams, and the solid waste landfills listed in Table C have a collective remaining capacity of

over 228 million cubic yards, waste generated from construction of the BESS component would not exceed the capacity of surrounding accepting facilities. Therefore, Project construction would have a less than significant impact involving solid waste recycling, disposal capacity, and impaired attainment of solid waste reduction goals.

Operation

Less than Significant Impact. As indicated in Table B, operation of the BESS component would generate both hazardous and nonhazardous waste. Hazardous operational waste would be stored on-site for less than 90 days and would be transported to a TSDF by a licensed hazardous waste transporter. Hazardous operational waste is anticipated to be accepted by Chemical Waste Management, Inc. Kettleman Hills Facility and/or Clean Harbors Buttonwillow Landfill. Nonhazardous operational waste would be recycled or disposed of at a Class II/III landfill, 6 of which exist within a 100-mile radius of the Project site. The Project would employ third parties to manage appropriate handling and disposal of nonhazardous solid waste. Considering there are multiple locations that would accept anticipated operational waste streams, and the solid waste landfills listed in Table C have a collective remaining capacity of over 228 million cubic yards, waste generated from operation of the BESS component would not exceed the capacity of surrounding accepting facilities. Therefore, Project operation would have a less than significant impact involving solid waste recycling, disposal capacity, and impaired attainment of solid waste reduction goals.

1.3.2.3 Utility Switchyard

Construction

Less than Significant Impact. As indicated in Table A, construction of the utility switchyard would generate both hazardous and nonhazardous construction waste. Hazardous construction waste would be stored on-site for less than 90 days and would be transported to a TSDF by a licensed hazardous waste transporter. Hazardous construction waste is anticipated to be accepted by Chemical Waste Management, Inc. Kettleman Hills Facility and/or Clean Harbors Buttonwillow Landfill. Nonhazardous construction waste would be recycled or disposed of at a Class II/III landfill, 6 of which exist within a 100-mile radius of the Project site. The Project would employ third parties to manage appropriate handling and disposal of nonhazardous solid waste. Considering there are multiple locations that would accept anticipated construction waste streams, and the solid waste landfills listed in Table C have a collective remaining capacity of over 228 million cubic yards, waste generated from construction of the utility switchyard would not exceed the capacity of surrounding accepting facilities. Therefore, Project construction would have a less than significant impact involving solid waste recycling, disposal capacity, and impaired attainment of solid waste reduction goals.

Operation

Less than Significant Impact. As indicated in Table B, operation of the utility switchyard would generate both hazardous and nonhazardous waste. Hazardous operational waste would be stored on-site for less than 90 days and would be transported to a TSDF by a licensed hazardous waste transporter. Hazardous operational waste is anticipated to be accepted by Chemical Waste Management, Inc. Kettleman Hills Facility and/or Clean Harbors Buttonwillow Landfill. Nonhazardous operational waste would be recycled or disposed of at a Class II/III landfill, 6 of which exist within a 100-mile radius of the Project site. The Project would employ third parties to manage appropriate handling and disposal of nonhazardous solid waste. Considering there are multiple locations that would accept anticipated operational waste streams, and the solid waste landfills listed in Table C have a collective remaining capacity of over 228 million cubic

yards, waste generated from operation of the utility switchyard would not exceed the capacity of surrounding accepting facilities. Therefore, Project operation would have a less than significant impact involving solid waste recycling, disposal capacity, and impaired attainment of solid waste reduction goals.

1.3.2.4 Overall Project

Less than Significant Impact. The overall Project would generate both hazardous and nonhazardous construction and operational waste. As detailed above, multiple waste facilities would have the capacity to accommodate both construction and operational hazardous and nonhazardous waste. The Project would use third parties to manage the transportation of both hazardous and nonhazardous waste. Therefore, impacts involving the generation of solid waste that would exceed the capacity of local infrastructure would be less than significant, and no mitigation is required.

1.4 Cumulative Impacts

Impacts of the Project would be considered cumulatively considerable if they would have the potential to combine with other past, present, or reasonably foreseeable projects to become significant.

1.4.1 Overall Project

As described above, solid waste disposal facilities report substantial remaining capacity to serve the Project and cumulative projects. Similar to the Project, cumulative projects would be subject to applicable construction and operational solid waste diversion regulations. Therefore, the Project would not result in a cumulatively considerable impact related to generation of solid waste in excess of state or local standards or the capacity of local infrastructure.

1.4.2 Utility Switchyard

Construction and operation of the utility switchyard is considered in the cumulative impact analysis of the overall Project discussed above; therefore, similar to the overall Project, cumulative impacts related to waste management would be less than significant.

1.5 Laws, Ordinances, Regulations, and Standards (LORS)

Nonhazardous and hazardous waste handling for the Project would be governed by federal, state, and local laws. Applicable laws and regulations address proper waste handling, storage, and disposal practices to protect the environment from contamination and to protect facility workers and the surrounding community from exposure to nonhazardous and hazardous waste. Table E on the following pages presents a summary of the LORS applicable to waste handling at the Project site.

Table E: LORS Applicable to Waste Management Plan

Jurisdiction	LORS	Applicability	Project Conformity
Federal	RCRA 42 United States Code 6901, Subtitle D	Sets national standards for the management of solid waste.	Solid waste generated by the Project would be collected and disposed of in accordance with Subtitle D.
Federal	RCRA 42 United States Code 6901, Subtitle C	Sets national standards for hazardous waste management	Hazardous waste generated by the Project would be handled and disposed in conformance with Subtitle C.
State	CEQA	Requires state and local government agencies to inform decision makers and the public about the potential environmental impacts of the Project and to reduce environmental impacts to the extent feasible.	The Project would conform with CEQA, as required by the California Energy Commission's Opt-In Application process.
State	California Green Building Standards Code	Provides mandatory recycling requirements.	Project-generated solid waste would be recycled in accordance with CALGreen requirements for recycling percentages.
State	California Integrated Waste Management Act (CIWMA)	Controls solid waste collectors, recyclers, and depositors.	Solid waste generated by the Project would be collected and disposed by a collection firm in conformance with CIWMA
State	Assembly Bill 341	Requires commercial businesses that generate 4 cubic yards or greater of solid waste to recycle.	The Project would recycle solid waste as able, in accordance with Assembly Bill 341.

Table E: LORS Applicable to Waste Management Plan

Jurisdiction	LORS	Applicability	Project Conformity
State	CCR Title 22, Division 4.5	Regulations regarding environmental health standards for the management of hazardous waste and universal waste.	Hazardous waste generated by the Project would be managed in conformance with CCR Title 22, Division 4.5
State	2018 CA State Hazard Mitigation Plan	Provides an updated and comprehensive description of California's historical and current hazard analysis, mitigation strategies, goals, and objectives.	The Project would comply with all mitigation strategies necessary to reduce/eliminate the risk of hazardous waste materials becoming or contributing to a natural hazard.
State	Hazardous Waste Control Act, Health and Safety Code, Division 20, Chapter 6.5, Article 2, Section 25100, et seq	Authorizes the DTSC and local certified unified program agencies (CUPAs) to regulate facilities that generate hazardous waste.	Hazardous waste generated by the Project would be in conformance with the Hazardous Waste Control Act.
Local	San Bernardino County General Plan: 1) Policy Plan Goal HZ-2 Policy HZ-2.4 2) Policy Plan Goal IU-4 Solid Waste	1) Describes truck routes for hazardous materials 2) Describes Countywide Plan policies taken to progress toward achieving the Countywide Plan goals.	Project would ensure all hazardous wastes transported off-site comply with established Truck Routes for Hazardous Materials set by the county. Project would not negatively impact Countywide Plan policy goals with respect to solid waste management (IU-4) as all waste would be properly recycled/disposed

Table E: LORS Applicable to Waste Management Plan

Jurisdiction	LORS	Applicability	Project Conformity
Local	San Bernardino County Code of Ordinances: Title 4, Division 3, Chapter 3	Authorizes Chief of County Fire Department (CFD), Chief of the Division of Environmental Health Services (DEHS) or public health department, and their enforcement officers to enforce provisions of the Public Nuisance Abatement Chapter, which includes accumulations of waste and hazardous materials.	The Project would take necessary steps to ensure no storage of wastes reaches quantities sufficient to warrant classification as a public nuisance and would allow for any necessary inspections of site deemed necessary by the CFD, DEHS, or public health department.
Local	San Bernardino County Code of Ordinances: Title 4, Division 3, Chapter 8	Establishes minimum standards for the storage of nonhazardous wastes within the unincorporated area of the County of San Bernadino.	The Project will comply with Chapter 8 to ensure storage of nonhazardous wastes meet standards for the storage of nonhazardous wastes in unincorporated San Bernardino County.
Local	San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP)	Outlines plan for reducing and/or eliminating risk in unincorporated area of the County and within areas overseen/managed by Flood Control District, Fire District, and Special Districts Department.	Plan does not have any regulations specific to hazardous wastes, as outlined in Table 7 of the MJHMP, but the Project would consider ways that the activities on site could increase likelihood of or worsen an identified hazard on the MJHMP and reduce/eliminate the risk accordingly, and would comply with the State Hazard Mitigation Plan.

Table E: LORS Applicable to Waste Management Plan

Jurisdiction	LORS	Applicability	Project Conformity
Local	San Bernardino County Division of Environmental Health Services, Solid Waste Local Enforcement Agency (LEA)	Ensures proper storage and disposal of solid waste, minimizes the presence of vectors related to solid waste handling and disposal methods and respond to public complaints relating to solid waste in San Bernardino County.	The Project would conform to the requirements of the San Bernardino County Solid Waste LEA.

Sources: US EPA (2024), CalRecycle (n.d.-a, -b, -c), San Bernardino County (n.d.-a, -b,-c,-d, 2022), California OPR (n.d.), California OES (n.d.)

OES: Office of Emergency Services

OPR: Governor's Office of Planning and Research

1.5.1 Federal LORS

1.5.1.1 Resource Conservation and Recovery Act

Nonhazardous Solid Waste

The State hazardous waste regulatory agency or the USEPA enforces hazardous waste laws. RCRA 42 United States Code 6901 Subtitle D assigns responsibility for the regulation of nonhazardous waste to the states (USEPA 2024).

Hazardous Waste

RCRA 42 United States Code 6901 Subtitle C establishes a "cradle to grave" system hazardous waste management by instituting controls for generation, transportation, treatment, storage, and disposal of hazardous waste. Above certain levels of hazardous waste generated, Subtitle C applies to all states and hazardous waste generators. RCRA also establishes regulations for the generation of energetic waste (explosives) in 40 CFR Part 266, Subpart M (USEPA 2024).

1.5.2 State LORS

1.5.2.1 CEQA

CEQA requires state and local government agencies to inform decision makers and the public about the potential environmental impacts of the Project and to reduce environmental impacts to the extent feasible. Appendix G of the CEQA Guidelines includes criteria for evaluating potential impacts related to soils.

1.5.2.2 California Green Building Standards Code

The California Green Building Standards Code, also known as CALGreen, includes mandatory recycling. Code Section 5.408 requires that 65 percent of the nonhazardous waste be recycled or salvaged for reuse. Code Section 5.408.3 (Excavated soil and land clearing debris) requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting from land clearing shall be reused or recycled.

1.5.2.3 California Integrated Waste Management Act

The California Integrated Waste Management Act (Assembly Bill [AB] 939, Sher, Chapter 1095, Statutes of 1989 as amended [IWMA]) made all California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 25 percent of their solid waste by 1995 and 50 percent by year 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year. The California Department of Resources Recycling and Recovery (CalRecycle) oversees and provides assistance to local governments as they develop and implement plans to meet the mandates of the IWMA and subsequent legislation (CalRecycle, n.d.-a).

1.5.2.4 Assembly Bill 341/Senate Bill 1018 Mandatory Commercial Recycling

Mandatory Commercial Recycling was one of the measures adopted in the AB 32 Scoping Plan by the California Air Resources Board (CARB) pursuant to the California Global Warming Solutions Act (Chapter 488, Statutes of 2006). The Mandatory Commercial Recycling Measure focuses on

increased commercial waste diversion as a method to reduce greenhouse gas (GHG) emissions. The regulation was adopted at CalRecycle's January 17, 2012, Monthly Public Meeting. And reflects the statutory provisions of AB 341 (Chesbro, Chapter 476, Statutes of 2011). The regulation was approved by the Office of Administrative Law on May 7, 2012, and became effective immediately. On June 27, 2012, the Governor signed Senate Bill 1018 which included an amendment that requires a business that generates 4 cubic yards or more of commercial solid waste per week to arrange for recycling services (CalRecycle n.d.-c).

1.5.2.5 California Code of Regulations Title 22 Division 4.5

The DTSC is responsible for implementation of CCR Title 22 Social Security, Division 4.5 Environmental Health Standards for the Management of Hazardous Waste. The regulations are applicable to generators, transporters, and operation of hazardous waste transfer, treatment, storage, and disposal facilities.

1.5.2.6 2018 California State Hazard Mitigation Plan

The 2018 California State Hazard Plan provides an updated and comprehensive description of California's historical and current hazard analysis, mitigation strategies, goals, and objectives, which includes all of the aforementioned with respect to hazardous waste materials storage, transport, and disposal.

1.5.2.7 Hazardous Waste Control Act

The Hazardous Waste Control Act grants authority to the DTSC and local agencies (CUPAs) to implement and enforce the provisions of the California Health and Safety Code, Division 20, Chapter 6.5, which includes those provisions included in CCR Title 22.

1.5.3 Local LORS

1.5.3.1 San Bernardino County General Plan

The County of San Bernardino's General Plan outlines requirements for safe and efficient disposal or recycling of solid waste, and for the handling of hazardous materials (San Bernardino County, n.d.-a, -b). The General Plan establishes a number of goals that the County seeks to achieve, and outlines policies necessary to achieve them. Several of these policies that might be applicable to the Project include, but are not limited to:

- **Goal HZ-2**: Human-generated Hazards; People and the natural environment protected from exposure to hazardous materials, excessive noise, and other human-generated hazards.
- **Policy HZ-2.1:** Hazardous waste facilities. We regulate and buffer hazardous waste facilities to protect public health and avoid impacts on the natural environment.
- **Policy HZ-2.3**: Safer alternatives. We minimize the use of hazardous materials by choosing and by encouraging others to use non-toxic alternatives that do not pose a threat to the environment.
- **Policy HZ-2.4**: We designate truck routes for the transportation of hazardous materials through unincorporated areas and prohibit routes that pass through residential neighborhoods to the maximum extent feasible.
- **Policy HZ-2.6:** Coordination with transportation authorities. We collaborate with airport owners, FAA, Caltrans, SBCTA, SCAG, neighboring jurisdictions, and other transportation providers in the preparation and maintenance of, and updates to transportation-related plans and projects to minimize noise impacts and provide appropriate mitigation measures.
- **Policy HZ-2.7**: Truck delivery areas. We encourage truck delivery areas to be located away from residential properties and require associated noise impacts to be mitigated.
- **Goal IU-4 Solid Waste**: Adequate regional landfill capacity that provides for the safe disposal of

solid waste, and efficient waste diversion and collection for unincorporated areas.

- **Policy IU-4.1**: Landfill capacity. We maintain a minimum ongoing landfill capacity of 15 years to serve unincorporated waste disposal needs.
- **Policy IU-4.2**: Transfer stations. We locate and operate transfer stations based on overall system efficiency.
- **Policy IU-4.3**: Waste diversion. We shall meet or exceed state waste diversion requirements, augment future landfill capacity, and reduce greenhouse gas emissions and use of natural resources through the reduction, reuse, or recycling of solid waste.
- **Policy IU-4.4:** Landfill funding. We require sufficient fees for use of County landfills to cover capital costs; ongoing operation, maintenance, and closure costs of existing landfills; and the costs and liabilities associated with closed landfills.

1.5.3.2 San Bernardino County Code of Ordinances

The San Bernardino County Code of Ordinances Title 4, Division 3, Chapter 3 authorizes the Chief of County Fire Department (CFD), Chief of the Division of Environmental Health Services (DEHS) or public health department, and their enforcement officers to enforce provisions of the Public Nuisance Abatement Chapter, which includes accumulations of solid waste and hazardous waste materials.

The San Bernardino County Code of Ordinances Title 4, Division 3, Chapter 8 establishes minimum standards for the storage of nonhazardous wastes within the unincorporated area of the County of San Bernadino (San Bernardino County, n.d.-c).

1.5.3.3 San Bernardino Multi-Jurisdictional Hazard Mitigation Plan (MJHMP)

There is no particular section of the County of San Bernardino Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) that is specific to hazardous waste. Table 7 of the MJHMP (Document Review Crosswalk) specifically notes the plan does not address mitigation of natural hazards associated with Hazardous Waste, but that both the 2007 San Bernardino General Plan and the 2018 CA State Hazard Mitigation Plan do address mitigation of natural hazards associated with hazardous wastes, both of which are accounted for in this waste management plan in Table E (San Bernardino County, 2022).

1.5.3.4 San Bernardino County Division of Environmental Health Services, Solid Waste Local Enforcement Agency (LEA)

San Bernardino County Environmental Health Services, Solid Waste Local Enforcement Agency (LEA) inspects and permits refuse vehicles and solid waste facilities (e.g., landfills, transfer stations, and composting facilities) (San Bernardino County, n.d.-d). State waste management programs are primarily conducted through county LEAs. LEAs have the primary responsibility for ensuring the correct operation and closure of solid waste facilities in the state, and for guaranteeing proper storage and transportation of solid wastes (CalRecycle, n.d.-b)

1.6 Agencies and Agency Contact

The U.S. Environmental Protection Agency, DTSC, and local agencies regulate and oversee the management of waste. In general, regulations are administered by San Bernardino County. A summary of Agency Contacts for waste management related to the Project have been provided in Table F below. No agencies listed have yet been contacted. All agencies will need to be contacted, notified of regulated activities to occur, and have all regulatory requirements met prior to commencement of any construction activities on Project site.

Table F: Agency Contact for Waste Management

Issue	Agency	Contact
Solid Waste Management	San Bernardino County Environmental Health Division, Solid Waste LEA	Adela Evans, Chief of Environmental Health Services 385 N. Arrowhead Ave, 2nd Floor San Bernardino, CA 92415 Phone: (800) 442-2283
	San Bernardino County Department of Public Works Solid Waste Management Division	Darren J. Meeka, Deputy Director Phone: (909) 386-8701
Hazardous Waste Management	Department of Toxic Substance Control (DTSC)	DTSC Chatsworth Regional Office: Phone: (818) 717-6500 Waste Management: Phone: (800) 618-6942
Hazardous Materials Business Plan/CUPA Hazardous and Nonhazardous Waste Management	CalEPA	Email: HMBP@calepa.ca.gov
	San Bernardino County Fire Protection District	Department Headquarters Daniel R. Munsey, Fire Chief/Fire Warden 598 S Tippecanoe Ave San Bernardino, CA 92408 Phone: (909) 387-5974 Email: info@sbcfire.org

1.7 Permits and Permit Schedule

Permits would be obtained after project approval for temporary storage and disposal of hazardous wastes. Additional permits pertaining to waste management during Project construction and operations phases are summarized in Table G.

Table G: Permits and Permit Schedule for Waste Management

Permit	Schedule	Status
Onsite Wastewater Treatment System (OWTS) Permit	After Project approval and prior to beginning construction	Completion upon Project approval
Hazardous Materials Business Plan (HMBP)	After Project approval and prior to beginning construction. Updated/new HMBP submittal for operations phase	Completion upon Project approval
Construction Waste Management Plan (San Bernardino County Solid Waste Management)	After Project approval and prior to beginning construction. This WMP is submitted as a part of the CEC's Opt-In application, and would be reviewed and updated as necessary to comply with San Bernardino County	Completion upon Project approval

1.8 References

ASTM. (2016). *ASTM E2247-16 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property*. Retrieved May 22, 2024, from https://www.astm.org/e2247-16.html

ASTM. (2022). *ASTM E2257-22 Standard Test Method for Room Fire Test of Wall and Ceiling Materials and Assemblies*. Retrieved June 10, 2024, from https://www.astm.org/e2257-22.html

California Department of Toxic Substance Control (DTSC). (n.d.-a). *CHEMICAL WASTE MANAGEMENT INC KETTLEMAN*. EnviroStor. Retrieved May 22, 2024, from https://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report?global_id=CAT000646117

California Department of Toxic Substance Control (DTSC). (n.d.-b). *CLEAN HARBORS BUTTONWILLOW LLC*. EnviroStor. Retrieved May 22, 2024, from https://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report?global_id=CAD980675276

California Department of Toxic Substance Control (DTSC). (n.d.-c). *COMMERCIAL OFFSITE HAZARDOUS WASTE PERMITTED FACILITIES*. EnviroStor. Retrieved May 22, 2024, from https://www.envirostor.dtsc.ca.gov/public/commercial_offsite.asp

California Department of Toxic Substance Control (DTSC). (n.d.-d). *Lead Threshold Limit*. Retrieved June 5, 2024, from https://dtsc.ca.gov/faq/lead-whats-the-threshold-for-non-hazardous-lead-do-we-still-have-to-take-wastes-with-more-than-350-ppm-total-lead-to-a-class-i-landfill-even-if-they-arent-hazardous-wastes/#:~:text=The%20total%20threshold%20limit%20for,Class%20I%20hazardous%20waste%20landfill.

California Department of Toxic Substance Control (DTSC). (n.d.-e). *PERMITTED HAZARDOUS WASTE FACILITIES IN CALIFORNIA*. EnviroStor. Retrieved May 22, 2024, from https://www.envirostor.dtsc.ca.gov/public/report_permitted_public

California Department of Toxic Substance Control (DTSC), HERO, & Fendick, E. A. (2020). *HUMAN HEALTH RISK ASSESSMENT (HHRA) NOTE NUMBER 3, DTSC-Modified Screening Levels (DTSC-SLS)*. California Department of Toxic Substances Control (DTSC). Retrieved May 22, 2024, from https://dtsc.ca.gov/wp-content/uploads/sites/31/2022/02/HHRA-Note-3-June2020-Revised-May2022A.pdf

California Governor's Office of Emergency Services (OES). (2018). *California State Hazard Mitigation Plan*. Cal OES. Retrieved May 22, 2024, from https://www.caloes.ca.gov/wp-content/uploads/002-2018-SHMP_FINAL_ENTIRE-PLAN.pdf

California Governor's Office of Planning and Research (OPR). (n.d.). *CEQA: The California Environmental Quality Act*. Governor's Office of Planning and Research. Retrieved May 22, 2024, from https://www.opr.ca.gov/ceqa/

California Natural Resources Agency (CNRA). (2016). CEQA APPENDIX G: ENVIRONMENTAL CHECKLIST FORM. In *California Environmental Quality Act (CEQA)*. Retrieved May 22, 2024, from https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/ab52/final-approved-appendix-G.pdf

CalRecycle. (n.d.-a). *California Integrated Waste Management Act Enforcement*. CalRecycle Home Page. Retrieved May 22, 2024, from https://calrecycle.ca.gov/lgcentral/enforcement/#:~:text=The%20California%20Integrated%%2020Waste%20Management,waste%20by%201995%20and%2050

CalRecycle. (n.d.-b). *Local Enforcement Agency (LEA) Central*. Retrieved May 22, 2024, from https://calrecycle.ca.gov/LEA/

CalRecycle. (n.d.-c). *Mandatory Commercial Recycling*. Retrieved May 22, 2024, from https://calrecycle.ca.gov/recycle/commercial/

CalRecycle. (n.d.-d). *SWIS Facility/Site Search*. Retrieved May 22, 2024, from https://www2.calrecycle.ca.gov/SolidWaste/Site/Search

CATL. (n.d.). *Energy Storage Solutions*. Retrieved May 22, 2024, from https://www.catl.com/en/ess/

Department of Toxic Substances Control (DTSC). (n.d.). *RCRA Facilities*. Department of Toxic Substances Control. Retrieved May 22, 2024, from https://dtsc.ca.gov/rcra-facilities/

Qcells North America. (n.d.). *QCells Product Safety Data Sheet*. us.qcells.com. Retrieved May 22, 2024, from https://us.qcells.com/wp-content/uploads/2023/07/Qcells_Product_safety_data_sheet_2023-03_Rev05_NA.pdf

San Bernardino County. (n.d.-a). *San Bernardino County - Business Plan*. Retrieved May 22, 2024, from https://countywideplan.com/business-plan/

San Bernardino County. (n.d.-b). *San Bernardino County - Policy Plan*. Retrieved May 22, 2024, from https://countywideplan.com/policy-plan/

San Bernardino County. (n.d.-c). *San Bernardino County Code of Ordinances*. American Legal Publishing. Retrieved May 22, 2024, from https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty_ca/0-0-0-146479

San Bernardino County. (n.d.-d). *Solid Waste Management Division*. San Bernardino County Public Works Solid Waste Management. Retrieved May 22, 2024, from https://dpw.sbcounty.gov/solid-waste-management/

San Bernardino County. (2022). San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan. In *San Bernardino County Website*. Retrieved May 22, 2024, from https://www.sbcounty.gov/uploads/SBCFire/documents/EmergencyServices/Hazard-Mitigation-Plan-202212.pdf

SWCA Environmental Consultants. (2023). *Phase I Environmental Site Assessment Update for the Solar Mountain Solar Project, LLC, 2670 acres East of I-15, San Bernadino County, California*.

US EPA. (n.d.). *Resource Conservation and Recovery Act (RCRA) Regulations*. United States Environmental Protection Agency. Retrieved May 22, 2024, from https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-regulations#nonhaz

US EPA. (2024, May 7). *Resource Conservation and Recovery Act (RCRA) and Federal Facilities*. Retrieved May 22, 2024, from https://www.epa.gov/enforcement/resource-conservation-and-recovery-act-rcra-and-federal-facilities

Waste Management, Inc. (n.d.). *Kettleman Hill Landfill*. Kettleman Hills Landfill - Waste Management. Retrieved May 22, 2024, from https://kettlemanhillslandfill.wm.com/index.jsp

Agency Correspondence

Outlook

Fw: EXTERNAL: RE: Correspondence Regarding San Bernardino County Landfill Information

From Hannah Gbeh <hannah@resolutionenvironmental.com>
Date Fri 10/25/2024 2:16 PM
To Hannah Gbeh <hannah@resolutionenvironmental.com>

From: Rodriguez, Veronica - SWMD <Veronica.Rodriguez@dpw.sbcounty.gov>
Sent: Thursday, October 24, 2024 6:23 PM
To: Lavy, Austin <Austin.Lavy@mbakerintl.com>
Subject: RE: EXTERNAL: RE: Correspondence Regarding San Bernardino County Landfill Information

Hi Austin, I have replied to the chart you provided with my response on which locations are capable of taking the soil and waste. The location on 2151 Nevada St. is not a county operated landfill, it belongs to the City of Redlands.

Once you provide testing reports, we can talk about a waste approval letter which will have approval of site locations, loads per day, and set start and end dates for the project.

We do have to take into consideration our maximum daily tonnage limits when coming to an agreement of how many tons per day we can take. That will all depend on the site and average daily tonnage and the time of the project. Our two largest locations that may be capable of taking both the waste and soil are the Victorville Landfill and Mid-Valley Landfill. Please review the information and let me know if you have any further questions.

Table C: Solid Waste Disposal Facilities Proximal to Project Site

Facility	Location	Class	Permitted Capacity (CYD)	Remaining Capacity (CYD)	Permitted Throughput (TPD)	Estimated Closure Date	
Barstow Landfill	32553 Barstow Rd. Barstow, CA 92311	III	80,354,500	71,481,660.00	1,500.00	5/1/2071	**Waste (Y), Soil (N)**
Victorville Landfill	18600 Stoddard Wells Road Victorville, CA 92307	III	93,400,000	79,400,000.00	3,000.00	10/1/2047	**Waste (Y), Soil (Y)**
Landers Landfill	59200 Winters Road Landers, CA 92285	III	13,983,500	11,148,100.00	1,200.00	1/1/2072	**Waste (N), Soil (N)**
Mid-Valley Landfill	2390 N. Alder Avenue Rialto, CA 92377	III	101,300,000.00	54,219,377.00	7,500.00	4/1/2045	**Waste (Y), Soil (Y)**
California Street Landfill	2151 Nevada Street Redlands, CA 92373	III	11,400,000	5,168,182	829	1/1/2042	**Not our landfill. Managed by the City of Redlands**

San Timoteo Landfill	San Timoteo Canyon Road Redlands, CA 92373	III	23,685,785.00	12,360,396.00	2,000.00	12/1/2039	**Waste (N), Soil (N)**

Thank you,

Veronica Rodriguez
Scale Operations Supervisor II
909-386-8778

From: Rodriguez, Veronica - SWMD
Sent: Thursday, October 24, 2024 10:52 AM
To: Lavy, Austin <Austin.Lavy@mbakerintl.com>
Subject: RE: EXTERNAL: RE: Correspondence Regarding San Bernardino County Landfill Information

Hi Austin, I will be calling you this afternoon to provide more information. Yes, you can list me as a contact

Veronica Rodrigeuz
Department of Public Works – Solid Waste Management Division
Office number 909-386-8701

Thank you,

Veronica Rodriguez
Scale Operations Supervisor II
909-386-8701

From: Lavy, Austin <Austin.Lavy@mbakerintl.com>
Sent: Wednesday, October 23, 2024 7:41 AM
To: Rodriguez, Veronica - SWMD <Veronica.Rodriguez@dpw.sbcounty.gov>
Subject: Re: EXTERNAL: RE: Correspondence Regarding San Bernardino County Landfill Information

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Hello Veronica,

Your response is appreciated. Do you have any comment on the ability of the county landfills to meet soil disposal needs for this project based on daily throughputs (presuming of course the project abides by all testing requirements and soil is classified as nonhazardous)?

Are you comfortable being listed as a contact on our Waste Management Plan for the Department of Public Works? This would just mean that, if the project is approved, any staff for the project involved with solid waste disposal with questions regarding that process would reach out to you first. I will of course include your response as a part of the Waste Management Plan.

Best,

Austin Lavy, EIT | Environmental Associate I
100 Airside Dr | Moon, PA, 15108 | [O] 216-776-6809 | [M] 937-570-9712
austin.lavy@mbakerintl.com | www.mbakerintl.com

From: Rodriguez, Veronica - SWMD <Veronica.Rodriguez@dpw.sbcounty.gov>
Sent: Monday, October 21, 2024 1:05 PM
To: Lavy, Austin <Austin.Lavy@mbakerintl.com>
Subject: RE: EXTERNAL: RE: Correspondence Regarding San Bernardino County Landfill Information

Good morning, Austin,

My apologies for the late response. We only take "in county trash" and our gate fee is $61.49 a ton. You can find additional pricing and all of our locations on our website Waste Disposal Sites – Public Works (sbcounty.gov)

We do not guarantee acceptance of loads over the phone or via email. They are acceptable on a case-by-case basis as each load is inspected upon entry by a load checker. For the dirt you are inquiring about, it would need to be tested prior to arrival and will require a waste approval letter from us as well as any construction debris from a structure would need asbestos testing and waste approval letter. I have added attachments with testing requirement information for the dirt.

Once the testing has been completed, we would need to know how many loads per day you plan to bring into the landfill and what type of vehicles would be used. We can then put together a waste approval letter.

Please reach out if you have any additional questions.

Thank you,

Veronica Rodriguez
Scale Operations Supervisor II

From: Lavy, Austin <Austin.Lavy@mbakerintl.com>
Sent: Monday, October 21, 2024 7:43 AM
To: Rodriguez, Veronica - SWMD <Veronica.Rodriguez@dpw.sbcounty.gov>
Subject: Re: EXTERNAL: RE: Correspondence Regarding San Bernardino County Landfill Information

You don't often get email from austin.lavy@mbakerintl.com. Learn why this is important

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Good morning Veronica,

Hope you had a good weekend. Just checking in to see if there are any updates on this. I don't mean to seem over eager, but the application is due for resubmittal soon, and the project is expecting our portion for resubmittal by this Wednesday. Your help is very much appreciated.

Best,

Austin Lavy, EIT | Environmental Associate I
100 Airside Dr | Moon, PA, 15108 | [O] 216-776-6809 | [M] 937-570-9712
austin.lavy@mbakerintl.com | www.mbakerintl.com

From: Rodriguez, Veronica - SWMD <Veronica.Rodriguez@dpw.sbcounty.gov>
Sent: Wednesday, October 16, 2024 7:34 PM

To: Lavy, Austin <Austin.Lavy@mbakerintl.com>
Subject: EXTERNAL: RE: Correspondence Regarding San Bernardino County Landfill Information

EXTERNAL EMAIL

Good afternoon, Austin,

I am currently looking into the information you have requested, and will get back to you as soon as I can compile the information you are requesting.

Thank you,

Veronica Rodriguez
Scale Operations Supervisor II

From: Lavy, Austin <Austin.Lavy@mbakerintl.com>
Sent: Monday, October 14, 2024 4:19 PM
To: Rodriguez, Veronica - SWMD <Veronica.Rodriguez@dpw.sbcounty.gov>
Subject: Re: Correspondence Regarding San Bernardino County Landfill Information

You don't often get email from austin.lavy@mbakerintl.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Veronica,

Just following up from my previous email. Do you have any time this week for a call to discuss the project?

Best,

Austin Lavy, EIT | Environmental Associate I
100 Airside Dr | Moon, PA, 15108 | [O] 216-776-6809 | [M] 937-570-9712
austin.lavy@mbakerintl.com | www.mbakerintl.com

From: Lavy, Austin
Sent: Monday, October 7, 2024 3:30 PM
To: veronica.rodriguez@dpw.sbcounty.gov <veronica.rodriguez@dpw.sbcounty.gov>
Subject: Correspondence Regarding San Bernardino County Landfill Information

Hello Veronica,

I work for the environmental division of Michael Baker International's Land Development and Infrastructure practice. I'm currently working on a Waste Management Plan (WMP) in support of an Application for Certification for a proposed solar energy development in San Bernardino County (Soda Mountain Solar Project). As part of the WMP, we are required to provide information on landfills nearby that can accept certain categories of waste, and the California Energy Commission (CEC) has asked that we also provide correspondence and contact information that demonstrates that we have confirmed the information presented in our WMP regarding landfills.

For context, you can find information regarding the proposed project here at the CEC's website: https://www.energy.ca.gov/powerplant/solar-photovoltaic-pv/soda-mountain-solar-project. Under the docket log, you can find under Appendix R our initial submission for the Waste Management Plan. This information request is an attempt to satisfy the CEC's comments from that initial submission.

Please see below a summary table of the landfills in question, which I believe all fall under your jurisdiction:

Table C: Solid Waste Disposal Facilities Proximal to Project Site

Facility	Location	Class	Permitted Capacity (CYD)	Remaining Capacity (CYD)	Permitted Throughput (TPD)	Estimated Closure Date
Barstow Landfill	32553 Barstow Rd. Barstow, CA 92311	III	80,354,500	71,481,660.00	1,500.00	5/1/2071
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Landers Landfill	59200 Winters Road Landers, CA 92285	III	13,983,500	11,148,100.00	1,200.00	1/1/2072
Mid-Valley Landfill	2390 N. Alder Avenue Rialto, CA 92377	III	101,300,000.00	54,219,377.00	7,500.00	4/1/2045
California Street Landfill	2151 Nevada Street Redlands, CA 92373	III	11,400,000	5,168,182	829	1/1/2042
San Timoteo Landfill	San Timoteo Canyon Road Redlands, CA 92373	III	23,685,785.00	12,360,396.00	2,000.00	12/1/2039

Source: CalRecycle Solid Waste Information System (SWIS) database
https://www2.calrecycle.ca.gov/SolidWaste/Site/Search
CYD = cubic yards
TPD = tons per day

The maximum estimated non-hazardous solid waste to be generated for this project over its 18-month timeline is 600,000 tons, the bulk of which is to be excavated soil (449,900 cubic yards or approximately 598,367 tons assuming an average 1.33 tons per cubic yard of soil).

The particular items I would like your help on are the following:

- Confirmation of the veracity of the information provided in Table C above, or in the event that any or all information is inaccurate, corrections.
- Confirmation that these facilities would accept the following categories of non-hazardous waste: 1) Construction and Demolition Debris (e.g. concrete, scrap metal, cardboard, nonhazardous office waste/paper/plastic), and 2) Excavated soil
- Given the estimated waste generation values presented, your opinion on whether or not the landfills listed would be able to meet the waste disposal needs of this project with respect to daily permitted throughputs and remaining capacities.
- Permission to list you as a point of contact and share our correspondence with the CEC as part of this application.

I understand that this is a lot of information. To be candid, we are shy for time and your prompt response to this would be very much appreciated.

If you have any questions regarding this request for information and would like to discuss, my direct number is 937-570-9712. I am available any time.

Best,

Austin Lavy, EIT | Environmental Associate I
100 Airside Dr | Moon, PA, 15108 | [O] 216-776-6809 | [M] 937-570-9712
austin.lavy@mbakerintl.com | www.mbakerintl.com