

Permitting Success

FEATURES - OPERATIONS FOCUS

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The development of a new solid waste facility involves a multitude of tasks, including design, engineering, permitting and construction. Permitting is crucial to the success of the project and must begin early in the process, as it is time consuming and can affect the overall schedule of the project.

This article will describe the successful permitting of a construction and demolition/inert debris (C&D/I) transfer and processing facility in South Gate, Calif., from its inception to the ultimate operation of the facility.

Background

The Construction and Demolition Recycling Inc. facility in South Gate is a fully permitted C&D/I processing and transfer facility. It is owned and operated by Interior Removal Specialist Inc., a company that primarily demolishes the interior of offices and other commercial buildings. The facility is permitted to receive 3,000 tons per day of material and primarily processes material from its own demolition operations as well as C&D debris generated by others. The facility has a high landfill diversion rate and, throughout the past several years, has diverted between 80 and 90 percent of all incoming materials for reuse and recycling.

The company is family owned and operated and has been in business since 1994. The site originally included 7 acres housing the company's equipment yard, where it stored its trucks and tools. In 2002, recognizing a growing interest as well as requirements to divert C&D materials, the company embarked on the process to develop its facility. The facility has obtained four major permits:

- **Conditional Use Permit** – The Conditional Use Permit (CUP) is essentially the land-use approval issued by the city. Initially, the facility obtained a CUP from the South Gate Planning Commission in June 2003 to allow for the operation of a processing facility for materials generated by the company's interior demolition contracting business. In 2007, Amendment No. 1 to the CUP was issued to allow the facility to increase tonnage up to 3,000 tons per day and to process the materials generated by the company and others. The proposed use was found to be in conformance with the city's zoning code and general plan and was approved by the Planning Commission.

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- **California Environmental Quality Act Review** – For the initial CUP, the city of South Gate conducted a review of the potential environmental impacts of the proposed facility and approved a Negative Declaration in June 2003, indicating the facility would have no significant impacts on the environment. A Mitigated Negative Declaration was approved for Amendment No. 1 in May 2007. The Mitigated Negative Declaration concluded the facility would not have an adverse impact on the environment as a result of the implementation of mitigation measures during project design, construction and operations that would reduce potential impacts to a level considered not significant.
- **Solid Waste Facility Permit** – The facility was issued a Solid Waste Facility Permit by the County of Los Angeles, Department of Public Health, Solid Waste Management Program, in 2008. The permit allows the facility to operate as a transfer/processing facility for construction, demolition and inert materials and to process up to 3,000 tons per day. The facility is permitted to operate 24 hours per day, seven days per week, and to accept only CD/I materials. Following the initial permit, in 2013 the facility was required to apply for a five-year permit review and, at that time, amended the permit to incorporate a grinder for processing up to 500 tons of green material per day as a part of the daily permitted capacity of 3,000 tons per day. The requirements and process to apply for the Solid Waste Facility Permit are described in the next section.
- **Storm Water Permit** – A Notice of Intent for a General Industrial Storm Water Permit (NPDES) was filed with the California State Water Resources Control Board. In addition, a Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program Plan (MPP) were prepared and implemented at the facility. The SWPPP and MPP detail the steps the facility takes to prevent, control and monitor stormwater runoff.

Solid Waste Permit Process

To obtain a solid waste facility permit in California, the facility operator must complete and submit to the local enforcement agency (LEA) a solid waste facility permit application and a processing facility report. The requirements for applying for a permit, and the requisite accompanying documents, are detailed in Title 14 of the California Code of Regulations (CCR), Division 7, Chapter 5.

At the outset of the project, it was decided to pursue a full Solid Waste Facility Permit from the state of California with a 3,000-ton-per-day capacity. At the time, the existing quantity of incoming materials would have required a smaller permit, which would have necessitated less time and resources to complete the permitting process. However, it was anticipated that, eventually, the facility would need a larger permit. The effort to go through the permitting process again at a later date, including duplicating some of environmental reviews, such as traffic studies, would have resulted in additional costs. Therefore, the company applied for the full permit and decided to develop the facility in phases based on the anticipated tonnage to be processed.

Phase I was proposed to be developed between years one and two, with a facility capacity up to 500 tons per day; Phase II was proposed to be developed in year three, with a capacity up to 1,500 tons per day; and Phase III was proposed between years six and 10, with a capacity of 3,000 tons per day. Phase III was structured to allow the facility to continue at the Phase II terms until such time as the facility tonnage surpassed the 1,500-ton-per-day mark, regardless of timing. This ensured that the facility would not have to purchase expensive equipment to satisfy Phase III requirements before the facility was bringing in enough tonnage to justify the expense.

This phasing of the facility allowed the operator to add equipment and personnel as necessary to process the daily tonnage received. Should the need have arisen to modify the time between phases, the facility could work with the city and state to amend the CUP and permit as necessary.

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The application is relatively straight-forward, with spaces to indicate the owner and operator's name, address and other pertinent information and check boxes to highlight the types and quantities of material to be accepted and processed, anticipated traffic and hours of operation. The application also asks for information on other permits or approvals that have been obtained or applied for. The application is not considered complete unless accompanied by other approval documents, including the Land Use Permit and Environmental Review mentioned previously as well as the Transfer Processing Report (TPR).

The TPR is essentially the operations and maintenance manual for the facility, and it provides descriptions of facility activities, operations, design and capacity and must describe all methods that will be used to comply with the state minimum standards for solid waste management. The report includes all of the following:

- A description of the waste receiving activities, including where vehicles will enter the facility, what the weighing procedures are and how the materials will be unloaded in the tipping areas. Individual unloading areas are designated for the receipt of source-separated materials and for materials that require processing. For materials that are not recovered, the waste transfer process is described, including how the transfer vehicles are loaded and any temporary staging of vehicles prior to leaving for a permitted disposal site.
- The Facility Design Capacity includes calculations to substantiate that the facility can handle the throughput capacity without causing environmental harm or safety problems. The calculations must include the number and types of trucks entering the facility daily and the size and capacity of the receiving areas as well as the anticipated tipping/unloading times and capacities. Processing capacities also must be calculated, including tons per hour, recovery rates and recycling and disposal tonnages.
- The types and quantities of materials received at the facility are indicated in the TPR, including the anticipated average annual loadings for the first 10 years of operation. A load-checking program implemented at the facility ensures only the permitted types of materials are accepted at the facility.
- The TPR also must describe the methods the facility will use to comply with the state minimum standards for solid waste handling and disposal, contained in Title 14, CCR, Division 7, Chapter 3. These include:
 - Siting on landfills
 - Burning wastes and open burning
 - Equipment
 - Litter control
 - Noise control
 - Nuisance control
 - Personnel health and safety
 - Roads
 - Scavenging and salvaging
 - Load checking
 - Residual waste removal
 - Training
 - Documentation of agency approvals, determinations and requirements
 - Cleaning and housekeeping
 - Site security
 - Traffic control
 - Water supply
 - General design requirements
 - Dust and drainage control
 - Hazardous, liquid and special wastes
 - Medical wastes
 - Non-salvageable materials
 - Maintenance program
 - Protection of users
 - Sanitary facilities
 - Signs
 - Parking
 - Supervision and personnel
 - Vector, bird and animal control
 - Firefighting equipment
 - Lighting
 - Site attendant
 - Visual screening

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Receiving Approval

SCS Engineers was contracted to complete the application, which included the TPR, site plans and other supporting documents. The application package was reviewed by IRS personnel prior to submitting to the LEA (Los Angeles County Public Health). Under state regulations, once the application is accepted by the LEA as complete, and within 60 days of receipt of the application, the LEA must submit the proposed permit package to the state agency CalRecycle for review. CalRecycle then has 60 days to concur or object.

The entire process took approximately three-and-one-half years from commencement of the application through receipt of the Solid Waste Facility Permit. It was considered to be a major accomplishment for getting the facility environmental and permit documents completed and approved in that short amount of time.

The facility continues to expand and recently added green waste processing and transfer operations for materials collected from residential curbside collection programs and commercial landscapers. The facility also is evaluating the potential to host a technology to process waste into renewable energy or other beneficial uses.

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