



Department of Toxic Substances Control



Matthew Rodriguez
Secretary for
Environmental Protection

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

February 26, 2018

Ms. Karen Avery
Senior Planner
Resource Management Department
County of Solano
675 Texas Street, Suite 5500
Fairfield, California 94533

DRAFT INITIAL STUDY AND NEGATIVE DECLARATION FOR U-91-17-AM1 D/K DIXON,
ADVANCED ENVIRONMENTAL, INC., dba D/K DIXON, DIXON, SOLANO COUNTY,
CALIFORNIA, EPA ID: CAT080012602

Dear Ms. Avery,

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Initial Study/Negative Declaration (IS/ND) for Advanced Environmental, Inc., dba D/K Dixon (Facility) located at 7300 Chevron Way, Dixon, California 95620, dated January 23, 2018.

Pursuant to sections 25200 and 25201.6 of the California Health and Safety Code, DTSC issued a Standardized Hazardous Waste Facility Permit to D/K Dixon on December 7, 2008, which is set to expire on December 6, 2018. DTSC filed a negative declaration for the 2008 permit renewal with the State Clearinghouse (No. 2008042011). As a responsible agency, DTSC reviewed the Draft IS/ND to determine if this document adequately evaluates impacts of an expected permit renewal and proposed expansion of the Facility.

DTSC believes the baseline to be used for the initial study are the conditions stated in the 2008 Initial Study/Negative Declaration. After reviewing the Draft IS/ND, DTSC has prepared the following comments.

1. The Draft Initial Study indicates that there is no increase in the Facility's truck traffic with the increase of hazardous waste storage capacity. The 2008 Initial Study/Negative Declaration included an average of 9 daily truck trips. The 2018 Draft Initial Study includes an increase to 25 daily truck trips. The environmental impact analysis of the increased truck trips should be included in the following sections: to 2.3 Air Quality, 2.7 Greenhouse Gas Emissions, 2.12 Noise and 2.16 Transportation and Traffic. The following are examples of items that should be included in the analysis:
 - a. A comparison of CalEEMod analysis for air quality and greenhouse gas emissions with the Yolo-Solano Air Quality Management District thresholds of significance.

- b. A verification that the noise in accordance with Solano County Noise Ordinance Section 28.1-70 do not exceed the thresholds listed in Section 28.1-40 for the single-family residence 1/10th mile from the Facility.
 - c. A demonstration (e.g., traffic study) that the traffic increase will not degrade the level of service of the surrounding roads to failure.
2. The hours of operation listed in the 2008 DTSC Initial Study/Negative Declaration were Monday through Friday 8:00 AM to 5:00 PM. The hours of operation listed in the Draft Initial Study are Monday through Saturday 3:00 AM to 12:00 AM. The environmental impact analysis of the hours of operation should be included in the following sections: 2.3 Air Quality, 2.7 Greenhouse Gas Emissions, 2.12 Noise and 2.16 Transportation and Traffic. The following is an example of what should be addressed in the analysis:
 - a. Evaluation of the operational hours impact to the noise level thresholds listed in Table 28.1-40 of Solano County Noise Ordinance from 7:00 PM to 7:00 AM.
3. There was no environmental impact analysis of Tribal Cultural Resources (XVII on Initial Study Checklist, Appendix G) included in the draft Initial Study. Below are DTSC actions in obtaining information regarding Tribal Cultural Resources:
 - a. DTSC contacts the California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project per Section 21080.3.1 of the California Public Resources Code and consults with them on the project.

If you have any questions regarding this letter, please contact me at (916) 255-6559 or Mr. Robert Irving, Senior Environmental Scientist (Specialist), at (916) 255-3638, Robert.Irving@dtsc.ca.gov.

Sincerely,



Ms. Parisa Khosraviani
Hazardous Substances Engineer
Permitting Division

cc: (via email)

Mr. Edward Nieto, P.E.
Supervising Hazardous Substances Engineer I
Permitting Division
Department of Toxic Substances Control
8800 Cal Center Drive, 2nd Floor
Sacramento, California 95826-3200
edward.nieto@dtsc.ca.gov

Mr. Robert Irving
Senior Environmental Scientist (Specialist)
Permitting Division – CEQA Unit
Department of Toxic Substances Control
8800 Cal Center Drive, 2nd Floor
Sacramento, California 95826-3200
robert.irving@dtsc.ca.gov