PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE **AGENDA DATE: Sept 11, 2025**

FROM: PLANNING & DEVELOPMENT SERVICES **AGENDA TIME 1:30 PM / No.1**

Omega Harvested Metallurgical
Battery Recycling Facility

PROJECT TYPE: CUP #25-0003 / IS #25-0009 SUPERVISOR DIST #5

LOCATION: 2255 Melon Rd APN: 045-570-088-000

Holtville, CA 92250 PARCEL SIZE: +/-21.36 AC

GENERAL PLAN (existing) Urban (Holtville) GENERAL PLAN (proposed) N/A

ZONE (existing) M-1-U (Light Industrial with Urban Overlay) ZONE (proposed) N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 09/11/2025

INITIAL STUDY: #25-0009

☒ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☐ NONE	☒ ATTACHED
AG	☐ NONE	☒ ATTACHED
APCD	☐ NONE	☒ ATTACHED
E.H.S.	☐ NONE	☒ ATTACHED
FIRE / OES	☒ NONE	☐ ATTACHED
SHERIFF	☐ NONE	☒ ATTACHED
OTHER	Imperial Irrigation District (IID), CEO, Yuma Quechan Indian Tribe, Campo Band of Mission Indians, City of Holtville, DTSC	

REQUESTED ACTION:

(See Attached)

☒ NEGATIVE DECLARATION
☐ MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Conditional Use Permit (CUP) #25-0003
Initial Study (IS) #25-0009
Omega Harvested Metallurgical
Battery Recycling Facility

Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
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September 2025

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SECTION 1
INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Conditional Use Permit #25-0003 (Refer to Exhibit "A" & "B").

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☐ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☒ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☐ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the

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principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

This Initial Study and Negative Declaration are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a potentially significant impact, potentially significant unless mitigation incorporated, less than significant impact or no impact.

PROJECT SUMMARY, LOCATION AND EVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in

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preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.

2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.

3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".

4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Negative Declaration will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared

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for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly

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describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.

- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

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II. Environmental Checklist

1. **Project Title**: Conditional Use Permit (CUP) #25-0003
2. **Lead Agency**: Imperial County Planning & Development Services Department
3. **Contact person and phone number**: Luis Bejarano, Planner II, (442)265-1736, ext. 1745
4. **Address**: 801 Main Street, El Centro CA, 92243
5. **E-mail**: luisbejarano@co.imperial.ca.us
6. **Project location**: 2255 Melon Road, Holtville, CA 92250
7. **Project sponsor's name and address**: Omega Harvested Metallurgical (OHM); 7515 Hill Rd Canal, Winchester, OH
8. **General Plan designation**: Urban
9. **Zoning**: M-1-U (Light Industrial with an Urban Overlay)
10. **Description of project**:

The applicant submitted a Conditional Use Permit application (CUP #25-0003) for battery recycling facility, with Initial Study #25-0009. The project proposes to use an existing 8,000 square foot facility at 2255 Melon Road in an unincorporated area adjacent to the City of Holtville, identified under Assessor's Parcel Number (APN) 045-570-088-000. The 21.36-acre subject parcel is currently built up with 7 building structures of varying sizes and has access from Melon Road.

The proposed battery recycling facility will focus on the crushing of inert batteries. These inert, inactive lithium batteries will be discharged in a facility in Los Angeles County and then delivered to the Holtville site via truck cargo Monday through Friday. A maximum of two trucks per day will be delivered to the site and up to two trucks will be transporting the crushed materials from the site to San Diego for export to Japan. Daily deliveries are expected to be approximately 40,000 lbs and a maximum of approximately 120,000 lbs. Deliveries are expected to occur around 11:00 am, while exports will take place around 9:00 am.

Discharged batteries are received primarily from the Los Angeles County facility and, on occasion, directly from automotive Original Equipment Manufacturers (OEMs). These batteries are classified under hazardous waste code D003. Before transport, OHM's Los Angeles County facility or the Original Equipment Manufacturers conducts a complete electrical resistance discharge using customized, purpose-built equipment to ensure the batteries are safely neutralized.

All batteries are discharged to 0 volts prior to shipment, in full compliance with 49 CFR Part 397 and all applicable packaging and handling regulations. These measures are implemented to eliminate the risk of hazardous materials being released into the environment during transport.

At the project site, sand and Class D fire extinguishing agents will be readily available in sufficient quantities to suppress and extinguish any potential fires, and to prevent their spread. To minimize the risk of thermal runaway, only the volume of batteries that can be processed within a single day will be accepted onsite, stockpiling is strictly avoided.

The onsite process will consist of crushing the batteries with an industrial crusher located inside the 8,000 square foot facility. The crusher will occupy an area of approximately 550 square feet. OHM employees will utilize volt meters to verify that all the batteries received at the project site are completely discharged to 0 volts. If there are any batteries found that are not completely discharged, they will be removed through a quarantine process and returned to their source for additional processing. Once batteries are confirmed as being discharged and inert, the batteries will be crushed into 1.5" to 3" chunks. Crushed materials are then placed onto metal drums which will then be transported to San Diego for shipping. The crushing system is designed as a closed system, with VOC (Volatile Organic Compound)/air quality monitoring and purifying equipment. Employees will be utilizing personal protective equipment as required.

The process takes approximately 24 hours from the time the batteries are received onsite until the time they leave the site. Crushed batteries are not stored on site for longer than 48 hours. Business operating hours are Monday through

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Friday, 8:00AM to 5:00PM, with a total of 4 employees working onsite at any given time.

11. Surrounding land uses and setting:

The proposed parcel is zoned as M-1-U (Light Industrial with an Urban Overlay) and is currently a developed parcel containing multiple buildings with undergoing operations. The north side of the property abuts an M-1-U (Light Industrial with an Urban Overlay) vacant parcel. The east of the property abuts Melon Rd, and across the street, Holtville Union High School within the City of Holtville. The West side of the property abuts two undeveloped dirt parcels zoned as M-1-U (Light Industrial with an Urban Overlay) and A-1-U (Light Agricultural with an Urban Overlay). Lastly, the South of the property abuts a mostly undeveloped parcel zoned as M-1-U (Light Industrial with and Urban Overlay), containing a unoccupied building on the north-eastern corner of the property.

12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Planning Commission.

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentially, etc.?

AB52 Opportunity to consult letters were sent to the Quechan and Campo Band of Mission Indians Tribes on April 11, 2025.The County received on April 12, 2025, an email response from the Quechan Indian Tribe advising they had no comments for this project. Additionally, an email from the Campo Banf of Mission Indians Tribe was received on April 13, 2025, requesting government to government consultation. After further review of the project scope of work, no additional comments have been submitted.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology /Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

☒ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Found that although the proposed project could have a significant effect on the environment, all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☐	☐	☒
ENVIRONMENTAL HEALTH SVCS	☒	☐	☐
OFFICE EMERGENCY SERVICES	☒	☐	☐
APCD	☒	☐	☐
AG	☒	☐	☐
SHERIFF DEPARTMENT	☐	☐	☒
ICPDS	☒	☐	☐

For [signature]
Jim Minnick, Director of Planning/EEC Chairman

9-11-2025
Date:

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PROJECT SUMMARY

A. **Project Location**: 2255 Melon Road, Holtville, CA 92250

B. **Project Summary**: The applicant has submitted a CUP application for a battery recycling facility to operate in an existing 8,000 sq. ft. building located at 2255 Melon Road, in an unincorporated area of the County, adjacent to the City of Holtville. Property identified under Assessor's Parcel Number 045-570-088-000. The proposed operation will exclusively process inert, inactive lithium batteries that have been discharged at a facility in LA County. These batteries will be delivered to the site in Holtville by truck, Monday through Friday, with daily deliveries of approximately 40,000 lbs and a maximum of approximately 120,000 lbs. Deliveries are expected to occur around 11:00 am, while exports will take place around 9:00 am. A maximum of two trucks will transport the crushed materials from the site to San Diego for export to Japan. Crushed batteries will be stored on-site for no more than 48 hours. The facility's operating hours will be Monday through Friday, from 8:00 am to 5:00 pm.

C. **Environmental Setting**: The project parcel is approximately 21.36 acres containing multiple buildings with industrial operations, located west of the City of Holtville, about 105 ft away from the Holtville Union High School and approximately 2,800 ft north of Evan Hewes Hwy. It is bordered by M-1-U (Light Industrial with and Urban Overlay) Zones on North, South and West, abutting city limits from Holtville towards East.

D. **Analysis**: The proposed project area is located within the County's General Plan designation of "Urban" and is currently zoned M-1-U (Light Industrial with an Urban Overlay), which allows for Recycling Facilities and would be considered consistent with the Imperial County's General Plan.

E. **General Plan Consistency**: The project is located within the County's General Plan designation of "Urban". The Project could be considered consistent with the General Plan and the County Land Use Ordinance upon the approval of the proposed Conditional Use Permit (CUP).

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Exhibit "A"
Vicinity Map

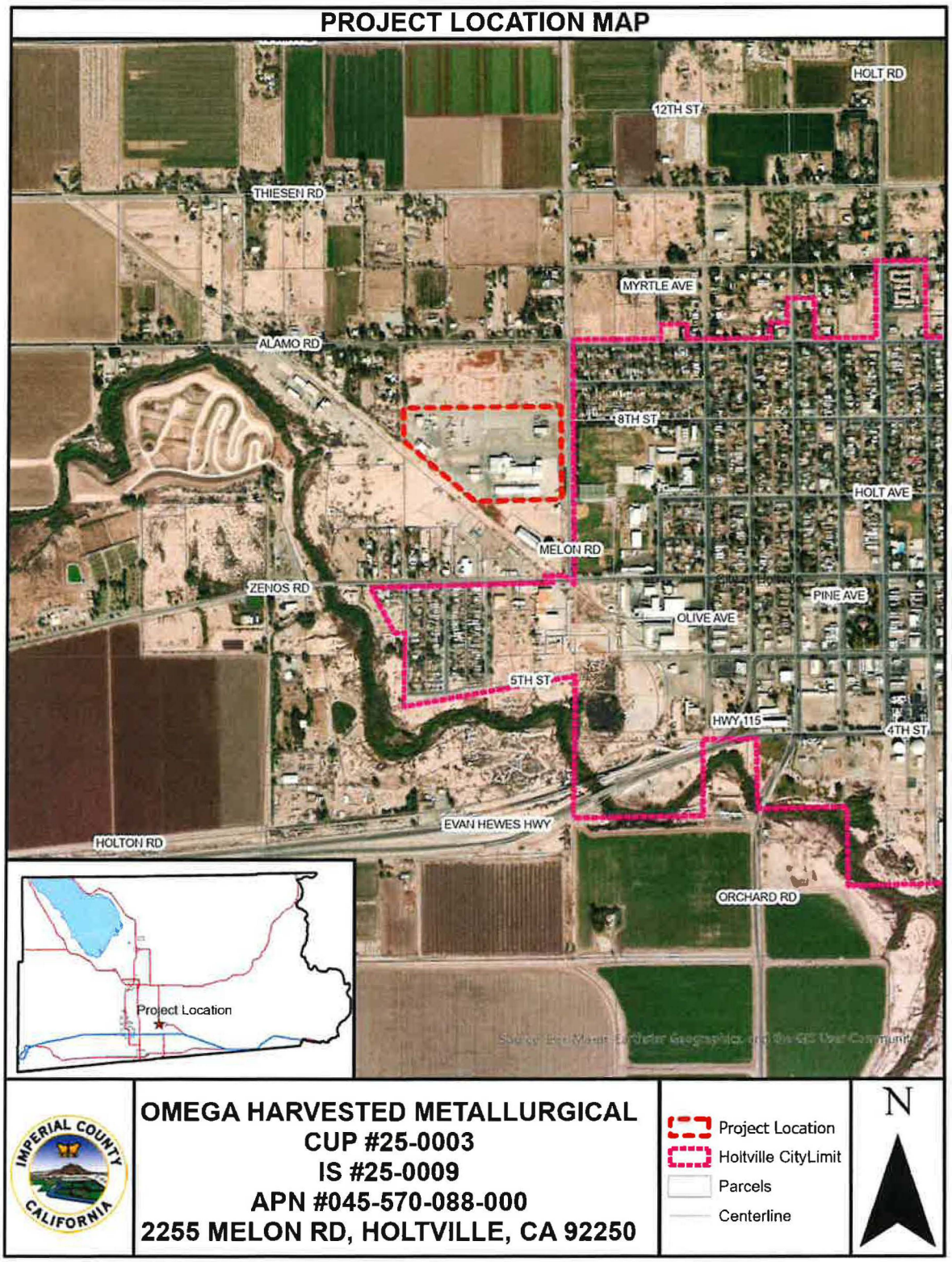

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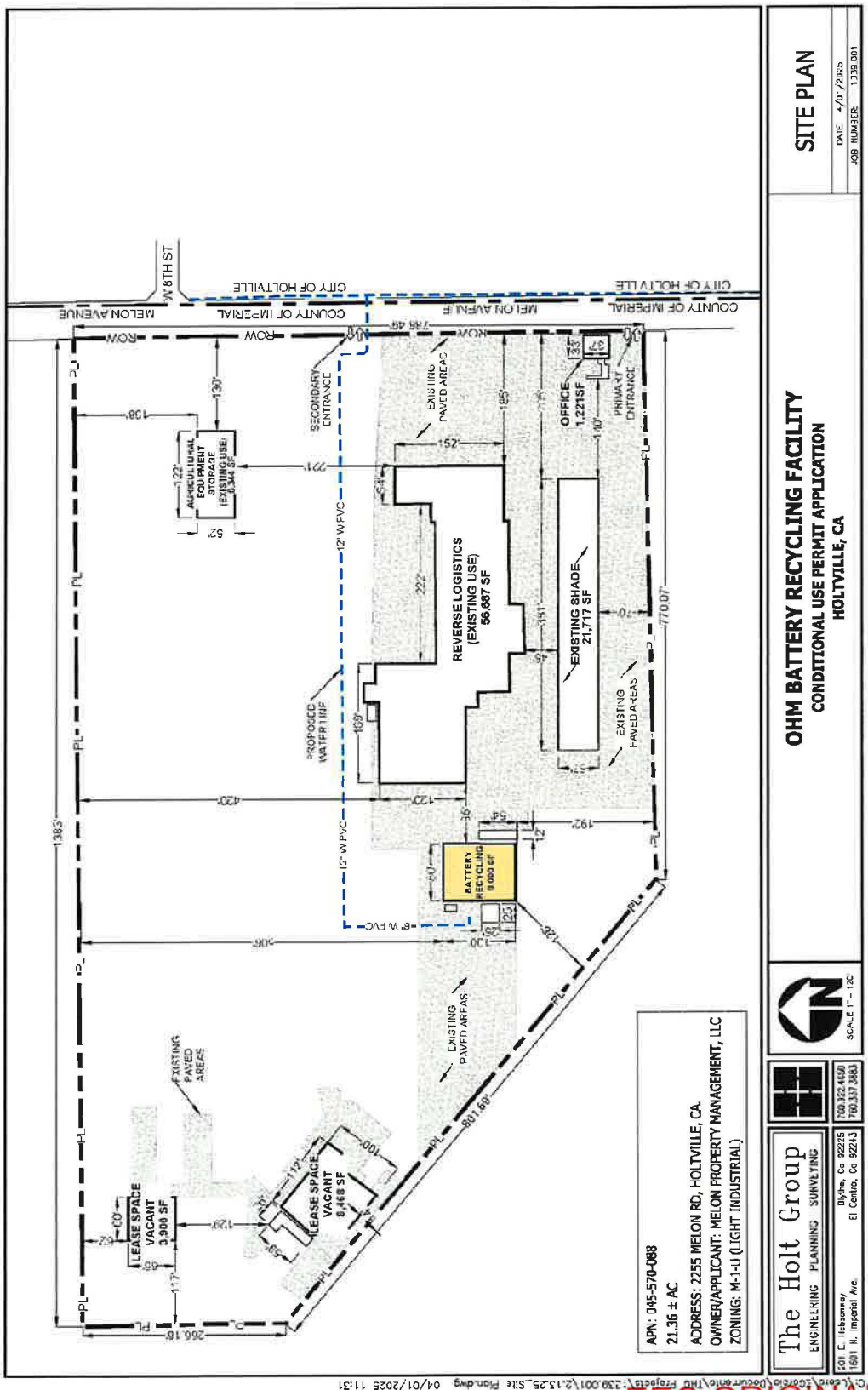
Exhibit "B"
Site Plan/Tract Map/etc.



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EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

I. *AESTHETICS*

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista or scenic highway? ☐ ☐ ☐ ☒

a) No recognized scenic vistas or officially designated State scenic highways are located near or are visible from the project area. The proposed project is located on the western side of the City of Holtville, about 2,800 ft north of the Evan Hewes Highway, which travels South of the City of Holtville connecting to 4th and 5th street. Considering the lack of proximity to scenic vista or scenic highway, according to the Imperial County General Plan Circulation and Scenic Highway Element[1] and the California State Scenic Highway System Map[2], no impact is expected.

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☐ ☒

b) As previously stated on section (I)(a), the proposed project is not located near a scenic vista or scenic highway and would not substantially damage any scenic resources. No impacts are expected.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ☐ ☐ ☒ ☐

c) The proposed project location consists of a parcel with existing buildings. The project is being proposed to operate within one of the existing buildings, not proposing any change to the existing character or quality of public views of the site and its surroundings. Any site improvements or changes to the existing conditions of the property will have to follow the requirements specified in Imperial County Title 9, Division 3 (Site & Design Standards). Therefore, less than significant impacts are expected.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ☐ ☐ ☒ ☐

d) The proposed project appears to not have substantial light or glare which would adversely affect day or nighttime views in the area, since no change in the existing facilities is being proposed. Additionally, all exterior lighting shall be shielded and directed away from adjacent properties and away from or shielded from public roads, as per Division 3, 90301.02 Development standards (Commercial & Industrial Zones) (K)[3]. Also, the project will be subject to a Design Review submitted to the Planning and Development Services Department should there be any building additions or site improvements. Therefore, less than significant impacts are expected.

II. *AGRICULTURE AND FOREST RESOURCES*

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. --Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ☐ ☐ ☐ ☒

a) The proposed project location is zoned M-1-U (Light Industrial with an Urban Overlay) as identified by the Imperial County

[1] Imperial County General Plan Circulation and Scenic Highway Element https://www.icpds.com/assets/planning/circulation-scenic-highway-element-2008.pdf

[2] California State Scenic Highway System Map https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

[3] Imperial County Title 9, Division 3 (Site & Design Standards). title-9-div-3-2014.pdf

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

Zone Map #4 (Title9, §92504.00)[4], currently occupied by multiple buildings with existing industrial operations and is not farmland, therefore, it would not be converting farmland to non-agricultural use. No impacts are anticipated.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? ☐ ☐ ☐ ☒

b) The proposed project location is zoned M-1-U (Light Industrial with an Urban Overlay) as identified by the Imperial County Zone Map #4 (Title 9, §92504.00)[4]. The proposed project location is not zoned for agricultural uses. Additionally, the County of Imperial has no current active Williamson Act contracts; therefore, it would not conflict with existing agricultural zoning or a Williamson Act contract. No impacts are anticipated.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ☐ ☐ ☐ ☒

c) The proposed project location is zoned M-1-U (Light Industrial with an Urban Overlay) as identified by the Imperial County Zone Map #4 (Title 9, §92504.00)[4] and would not conflict with existing forest land or cause re-zoning of existing forest land. No impacts are anticipated.

d) Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

d) The proposed project location is zoned M-1-U (Light Industrial with an Urban Overlay) as identified by the Imperial County Zone Map #4 (Title 9, §92504.00)[4]. The proposed project site would not result in the loss of forest land or conversion of forest land into non-forest use. No impacts are anticipated.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

e) The subject project proposes to operate in an existing 8,000 square feet building, operating a battery recycling facility. Such proposed operation would not cause changes to the existing environment resulting in the conversion of farmland to non-agricultural use or conversion of forest to non-forest use. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or local importance agricultural operations will be converted to non-agricultural or non-forest use. No impacts are anticipated.

III. *AIR QUALITY*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to the following determinations. Would the Project:

a) Conflict with or obstruct implementation of the applicable air quality plan? ☐ ☐ ☒ ☐

a) The proposed project will implement equipment that consists of a closed crushing system with VOC/air quality monitoring and purifying equipment. The LA County facility from which the received batteries come from, will perform a complete electrical, resistance discharge on the batteries using customized, purpose-built equipment prior to being transported in accordance with 49CFR Part 397, following all packaging and handling requirements to prevent release of hazardous contaminants to the environment. Batteries are discharged to 0 volts prior to transport. OHM employees will utilize meters to verify that all batteries received at the project site are completely discharged to 0 volts. If there are any batteries found that are not completely discharged, they will be removed through a quarantine process and returned to their source for additional processing. The proposed project will be required to adhere to the requirements of the Air Pollution Control District (APCD) and comply with APCD's rules and regulations as mentioned in their comment letter dated April 25, 2025.[5] Based on this information and considering the implementation of rules and regulations set forth by the Air Pollution Control District, any expected impact would be less than significant.

b) Result in a cumulatively considerable net increase of any ☐ ☐ ☒ ☐

[4] Imperial County Title 9, Division 25 (Zoning Maps/Amendments) title-9-div-25-2015.pdf

[5] Imperial County APCD Comment letter dated April 25, 2025.

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

b) It is expected that adherence to the requirements mentioned above in section III a), and the implementation of a closed crushing system with VOC/air quality monitoring and purifying equipment, would prevent the project from resulting in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during operation of the battery recycling facility. Any impacts are expected to be less than significant.

c) Expose sensitive receptors to substantial pollutants concentrations? ☐ ☐ ☒ ☐

c) It is expected that adherence to the requirements mentioned above in section III a), and the implementation of a closed crushing system with VOC/air quality monitoring and purifying equipment, would prevent the project from exposing sensitive receptors to substantial pollutants during the operation of the battery recycling facility. Any impacts are expected to be less than significant.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? ☐ ☐ ☒ ☐

d) As mentioned in section III a), the project proposes a closed crushing system with VOC/air quality monitoring and purifying equipment. The entire process is mechanical in nature, and does not require water, fire, or chemicals to complete. The entire process does not result in electrolyte or solvent residues as no solvents are used, and electrolytes have been discharged. The electrolyte evaporates into the VOC system extremely fast and is treated/eliminated. The process takes approximately 24 hours from the time the batteries are received on site until the time they leave the site. Crushed batteries are not stored on site for longer than 48 hours. Based on this information, it is not expected that the project will result in other emissions leading to odors adversely affecting a substantial number of people. Any impact is expected to be less than significant.

IV. *BIOLOGICAL RESOURCES Would the project:*

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ☐ ☐ ☒ ☐

a) According to the Imperial County General Plan's Conservation and Open Space Element[6], Figure 1 "Sensitive Habitat Map"[6a] the project is not located within a sensitive habitat area. Additionally, in accordance to Figure 2 "Sensitive Species Map"[6b] and the Department of Fish and Wildlife Predicted Habitat Map[7], the project is located within the Burrowing Owl Species Distribution Model area. Nevertheless, the proposed project will be located within a developed parcel of approximately 21.36 Acres and will operate within an 8,000 sq. ft. existing building with no alterations or extensions being proposed to the existing facility's footprint. Consequently, the project does not appear to have a substantially adverse effect, either directly or through habitat modification, or to any species identified as a candidate, sensitive, or of special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife Service. Based on this information, any expected impact would be less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ☐ ☐ ☒ ☐

b) As previously stated on section (IV)(a), the proposed project site is not located within a sensitive or riparian habitat, or on other sensitive natural community area as depicted on Figure 3 "Agency-Designated Habitats Map[6C]" from the Imperial County General Plan's Conservation and Open Space Element[6]. Additionally, the proposed project site is within a developed parcel of approximately 21.36 Acres and will operate within an 8,000 sq. ft. existing building with no alterations or extensions being proposed to the existing facility's footprint; therefore, it does not appear to have a substantial effect in local regional

[6] Imperial County General Plan: Conservation and Open Space Element https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf

[7] California Department of Fish and Wildlife Burrowing Owl Predicted Habitat https://www.arcgis.com/apps/mapviewer/index.html?layers=7408ee3f25e8470488db163c4d00dc25

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

plans, policies, and regulations with respect to sensitive natural communities or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Any impacts are expected to be less than significant.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☒ ☐

c) According to the National Wetlands Inventory: Surface Waters and Wetlands Map[8], National Water Information System: Mapper[9], and California Sustainable Groundwater Management Act (SGMA) Data Viewer[10], the proposed project is not located within a riparian habitat and which will not cause a substantial adverse effect on federal protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Any impacts are expected to be less than significant.

d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☒ ☐

d) The proposed project site is located on a parcel zoned as M-1-U (Light Industrial with an Urban Overlay) currently occupied by multiple buildings with existing industrial operations, said parcel contains an overall area of approximately 21.36 Acres, while the proposed project expects to occupy an estimated area of 8,0000 sq. ft, within an existing building with no proposed expansion of the building's footprint. As previously stated on item (IV)(b) above, the project site is not located within a Sensitive Habitat; therefore, it would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Any impacts are expected to be less than significant.

e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance? ☐ ☐ ☐ ☒

e) e) The proposed project does not conflict with any local policy or ordinance protecting biological resources, such as tree preservation policies or ordinances. No impacts are expected.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ☐ ☐ ☒ ☐

f) The proposed project site is not located within a designated sensitive area according to the Imperial County General Plan's Conservation and Open Space Element[6]; therefore, it would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Any impacts are expected to be less than significant.

V. *CULTURAL RESOURCES* *Would the project:*

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? ☐ ☐ ☒ ☐

a) According to the Imperial County General Plan's Conservation and Open Space Element[6], Figure 5-"Areas of Heightened Historic Period Sensitivity Map[6d]," the proposed project site may be located within the Sitgreaves and Parke Exploration and Trail Route (1770-1890). Additionally, in accordance to Figure 6-"Known Areas of Native American Cultural Sensitivity,[6e]" the proposed project site is not located within the immediate vicinity of a known area of cultural sensitivity to Native Americans. Furthermore, the proposed project would be located in a parcel with existing industrial development and will operate within an existing 8,000 sq. ft. building with no proposed expansion of the building's footprint. The project will also be adjacent to existing development, with no documented or known archeological resources. Any impact would be less than significant.

[8] National Wetlands Inventory: Surface Waters and Wetlands Map https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

[9] National Water Information System: Mapper https://maps.waterdata.usgs.gov/mapper/index.html

[10] California Sustainable Groundwater Management Act (SGMA) Data Viewer https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#currentconditions

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐

b) The proposed project site is located on a parcel with an existing industrial development and will operate within an existing 8,000 sq. ft. building with no proposed expansion of the building's footprint. Additionally, the project location is adjacent to other parcels with existing development with no documented nor known archeological resources. The proposed battery recycling facility project is not likely to cause a substantial adverse change to any archeological resource. Any impacts are expected to be less than significant.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

c) As previously stated on items (V)(a) and (V)(b) above, the proposed project site is not located within or adjacent to any cemeteries, therefore, the proposed battery recycling facility would not disturb any human remains, including those interred outside of dedicated cemeteries. Additionally, in the event of an accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county is contacted to determine that no investigation of the cause of death is required. In addition, the coroner of the county shall contact the Native American Heritage Commission (NAHC) within 24 hours if such remains are believed to pertain to a deceased Native American. Any impacts are expected to be less than significant.

VI. *ENERGY Would the project:*

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

a) The existing 8,0000 sq. ft. building proposed for the project currently has electrical service provided by IID. It is not expected that the proposed operation will result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Additionally, per comment letter received from the Imperial Irrigation District (IID) dated April 22, 2025[11], should the project require an electrical service upgrade, the applicant should be advised to contact the IID to initiate the proper process. Adherence to IID's standards, regulations, and recommendations would bring any impacts to less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

b) As mentioned above on (VI)(a) the proposed project is for the operation of a battery recycling facility within an existing 8,000 sq. ft. building with electrical services provided by the IID, expecting no major upgrade to the existing services; therefore, the proposed project would not obstruct a state or local plan for renewable energy or energy efficiency. New future developments would require compliance with the latest energy efficiency and renewable energy standards and regulations. Additionally, as previously mentioned on item (VI)(a), the applicant would adhere and comply with IID's standards, regulations, and recommendations. Any impacts are expected to be less than significant.

VII. *GEOLOGY AND SOILS Would the project:*

a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:	☐	☐	☒	☐

a) The proposed development does not appear to conflict with the geology and soil of on-site or adjacent properties, and it does not expose people or structures to potential adverse effects, including risk of loss injury or death. The project proposes operating within an existing 8,000 Sq. Ft. structure, no new structures are being proposed for the operation of the battery recycling facility. Additionally, any future construction or development will have to comply with the regulations set forth by the California Building Code at the time of the permitting and construction. Therefore, a less than significant impact is expected.

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☒	☐

[11] Imperial Irrigation District, Comment Letter dated April 22, 2025

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

1) According to the California Department of Conservation: Fail Activity Map[12], United States Geological Survey's Quaternary Faults Map[13], Imperial County General Plan Seismic and Public Safety Element[14], Figure 2 "Regional Fault Lines", the proposed project site is not located within known fault zone. Although the Brawley Seismic Zone is located approximately 1.35 miles west of the proposed project site, Imperial County is classified as Seismic Zone D per Section 1613 et. seq. of the California Building Code, which requires that any developments within this zone incorporate the most stringent earthquake resistant measures. The project proposes operating within an existing 8,000 Sq. Ft. structure, no new structures are being proposed for the operation of the battery recycling facility. Additionally, any future construction or development will have to comply with the regulations set forth by the California Building Code at the time of the permitting and construction. Therefore, a less than significant impact is expected.

2) Strong Seismic ground shaking? ☐ ☐ ☒ ☐

2) As previously stated on item (VII)(a)(1) above, the proposed project is located approximately 1.35 miles west of the Brawley Seismic Zone indicating seismic ground shaking could be expected. Adherence to the latest edition of the California Building Code and as well as to go through a ministerial building permit review would bring any impacts to less than significant levels.

3) Seismic-related ground failure, including liquefaction and seiche/tsunami? ☐ ☐ ☐ ☒

3) The proposed project site is not located in a seiche/tsunami area per the California Tsunami Data Maps[15]. No impacts are expected.

4) Landslides? ☐ ☐ ☒ ☐

4) According to Imperial County General Plan's Seismic and Public Safety Element[14], Figure 3 "Landslide Susceptibility", the proposed project site is not located within the immediate vicinity of a landslide activity area. The topography within the proposed project site is generally flat and no new construction is being proposed as part of the project. However, any future construction and erection would be subject to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Therefore, less than significant impacts are expected.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

b) According to Imperial County General Plan's Seismic and Public Safety Element[14], Erosion (page 15), areas in Imperial County that are most susceptible to erosion include the Algodones Sand Dunes, as well as the Chocolate, Picacho, Cargo Muchacho, and Coast Range Mountains. The proposed project is not located within the immediate vicinity of a substantial soil erosion area. Any impacts are expected to be less than significant.

c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? ☐ ☐ ☒ ☐

c) As previously stated on sections (VII)(a)(1)-(VII)(a)(4) and (VII)(b) above, the proposed project site is not located on a geological unit that would become unstable or collapse as a result of the proposed telecommunications facility project. Any construction would be subject to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Adherence and compliance to these standards and regulations would bring any impact to less than significant.

d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property? ☐ ☐ ☒ ☐

d) According to the U.S. Department of Agriculture, Natural Resources Conservation Service "Soil Maps"[16] the proposed

[12] California Department of Conservation: Fail Activity Map https://maps.conservation.ca.gov/cgs/fam/

[13] United States Geological Survey's Quaternary Faults Map https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf

[14] Imperial County General Plan Seismic and Public Safety Element https://www.icpds.com/assets/GPA21-0004-Seismic-and-Public-Safety-Element-11-22-2022.pdf

[15] California Tsunami Data Maps https://www.conservation.ca.gov/cgs/tsunami/maps

[16] U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Maps https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

project site is located on an area containing Imperial-Glenbar, and silty clays loams. However, as previously stated on section (VII)(c), the proposed project design and any other future construction will require adherence and compliance to the latest edition of the California Building Code standards and regulations, as well as going through a ministerial building permit review which would bring any impact to less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? ☐ ☐ ☐ ☒

e) The proposed project is for the operation of a battery recycling plant in an existing 8,00 sq. ft. building and does not propose any septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Additionally, should any septic systems be proposed in the near future, the applicant should adhere to and comply with the Imperial County Public Health Department, Division of Environmental Health standards and regulations. No Impacts are expected.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☐ ☐ ☒ ☐

f) The proposed project is to be located within a parcel with industrial development and does not appear to directly or indirectly destroy a unique paleontological resource or site of unique geologic feature on site as there are no known unique resources or features on site or records of. Additionally, the project proposes operating within an existing facility with no ground disturbance expected. In the event that during any future construction any paleontological findings were to be identified, all work shall be stopped, and applicant shall contact a qualified paleontological specialist to inspect the site. Any impacts are expected to be less than significant.

VIII. *GREENHOUSE GAS EMISSION* *Would the project:*

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ☐ ☐ ☒ ☐

a) The proposed battery recycling facility is to be located within a parcel with existing industrial operations and an area surrounded by parcels already impacted with existing urban uses. The action is not expected to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Additionally, as previously stated on item (III)(a) above, although the project does not anticipate any construction work, during any future construction phase, any earth-moving activities and diesel exhaust and volatile organic compound (VOC) emissions which are typically related to construction trucks and machinery, are the pollutants that could possibly affect the nearest sensitive receptors. This exposure would be temporary and would be lessened by adhering to Air Pollution Control District's and Division of Environmental Health rules and regulations. Adherence and compliance with APCD's and EHS' rules, regulations, and requirements would bring any impact to less than significant.

b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

b) The proposed project would not conflict with any regulations under AB 32 Global Warming Solutions Act of 2006, of reducing the emissions of greenhouse gases to 1990 levels by 2020 provided that the applicant adheres to APCD's and EHS' rules, regulations and requirements. Less than significant impacts are expected.

IX. *HAZARDS AND HAZARDOUS MATERIALS* *Would the project:*

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ☐ ☐ ☒ ☐

a) Discharged batteries are received from the LA County facility and occasionally directly from automotive original equipment manufacturers (OEM's). The waste code of batteries is D003. OHM'S LA County facility (or the OEM) will perform a complete electrical, resistance discharge on the batteries using customized, purpose-built equipment prior to being transported in accordance with 49CFR Part 397, following all packaging and handling requirements to prevent release of hazardous contaminants to the environment. Batteries are discharged to 0 Volts prior to transport. The amount of material on site any given day will be limited to what can be processed on that day. This is so as not to stockpile batteries to minimize the risk of thermal runaway. The crushing system is designed as a closed system, complete with VOC/air quality monitoring and

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purifying equipment. Employees will be utilizing personal protective equipment as required. OHM's goal is zero waste and all items received are to be recycled. There are no waste streams (hazardous or otherwise) generated during the battery crushing process. OHM's recycling process is to capture all heavy metal materials from the discharged batteries. There is no waste characterization data as there is no waste to be disposed of. Regardless, the project will comply with all requirements of the Resource Conservation and Recovery Act (RCRA) and the regulations and permitting requirements enforced by the DTSC, as described in the Department of Toxic Substances Control comment letter, dated April 25, 2025[17]. Following the requirements and regulations mentioned above would bring any impact to less than significant.

b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ☐ ☐ ☒ ☐

b) As mentioned on item (IX)(a), discharged batteries are received from the LA County facility and occasionally directly from automotive original equipment manufacturers (OEM's). The waste code of batteries is D003. OHM'S LA County facility (or the OEM) will perform a complete electrical, resistance discharge on the batteries using customized, purpose-built equipment prior to being transported in accordance with 49CFR Part 397, following all packaging and handling requirements to prevent release of hazardous contaminants to the environment. Batteries are discharged to 0 Volts prior to transport. The amount of material on site any given day will be limited to what can be processed on that day. This is so as not to stockpile batteries to minimize the risk of thermal runaway. The crushing system is designed as a closed system, complete with VOC/air quality monitoring and purifying equipment. Employees will be utilizing personal protective equipment as required. OHM's goal is zero waste and all items received are to be recycled. There are no waste streams (hazardous or otherwise) generated during the battery crushing process. OHM's recycling process is to capture all heavy metal materials from the discharged batteries. There is no waste characterization data as there is no waste to be disposed of. Regardless, the project will comply with all requirements of the Resource Conservation and Recovery Act (RCRA) and the regulations and permitting requirements enforced by the DTSC, as described in the Department of Toxic Substances Control comment letter, dated April 25, 2025[17]. Following the requirements and regulations mentioned above would reduce the possibility of 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, bringing any impact to less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ☐ ☐ ☒ ☐

c) Although the nearest school (Holtville High School) is located within one-quarter (1/4) of a mile radius from the project site, approximately 1,600 ft west from the nearest classroom; as mentioned on items (IX)(a) and (b), the proposed project will operate under a closed design crushing system, with VOC/air quality monitoring and purifying equipment. Additionally, adherence to permitting and monitoring requirements from the Department of Toxic Substances Control is expected, resulting in a less than significant impact.

d) 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? ☐ ☐ ☐ ☒

d) The proposed project is not located on a site included on a list of hazardous materials sites according to California Department of Toxic Substances Control EnviroStor[18] or within any of the listed facilities/sites from page 35 of the Imperial County General Plan: Seismic and Public Safety Element[14]; therefore, no impacts are expected.

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 or excessive noise for people residing or working in the project area? ☐ ☐ ☐ ☒

e) The proposed project is not located within an airport land use plan per Imperial County Airport Land Use Compatibility Maps[19]. Therefore, the project is not expected to create an aircraft hazard for people in the proposed project area. The closest airport is Holtville Airport, approximately 6 miles East of the proposed project site. Therefore, no impact would be expected.

[17] Department of Toxic Substances Control comment letter, dated April 25, 2025

[18] California Department of Toxic Substances Control EnviroStor https://www.envirostor.dtsc.ca.gov/public/

[19] Imperial County Airport Land Use Compatibility Maps https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=46f7796b2dfb4a6db5311d7892f0b411

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		Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

f) The proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. The applicant would meet any requirements requested by the IC Fire/OES Department. Less than significant impacts are expected.

g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

g) According to CalFire's "Fire Hazard Severity Zones in Local Responsibility Areas – Imperia County Map"[20] effective April 1, 2024, the proposed project site is designated as Local Responsibility Area (LRA) Unzoned; therefore, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildfires. Additionally, as previously discussed in section (IX)(f), the applicant would meet any requirements as set forth by the Imperial County Fire/OES Department. Compliance with the Imperial County Fire Department (ICFD) standards, requirements, and recommendations would bring any impact to less than significant.

X. *HYDROLOGY AND WATER QUALITY* *Would the project:*

a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

a) The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Additionally, water is not used in crushing the batteries nor are there any hazardous materials involved in the entire process and therefore, contamination of stormwater is not expected. Any impact would be less than significant.

b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

b) Domestic water is provided to the site via an existing water pipeline from the City of Holtville. As mentioned in item (X)(a), the proposed operation would not use water for the recycling/crushing process. No substantial increase in the use of the existing water supply is anticipated. Therefore, a less than significant impact is expected.

c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐

c) The battery recycling facility is being proposed to operate within an existing building with no additional construction or ground disturbance. Any future development will be subject to permitting requirements and adherence to the latest version of the California Building Code. Any impact would be considered less than significant.

(i)	result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

i) The proposed battery recycling facility will be located in a parcel with existing Industrial operations and will be operating within an existing 8,000 sq. ft. building. No construction, ground disturbance or operation is anticipated that would result in substantial erosion or siltation on- or off-site. Any impact would be considered less than significant.

(ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐

ii) The proposed battery recycling facility will be located in a parcel with existing Industrial operations and will operate within an existing 8,000 sq. ft. building. As mentioned on item (X)(C)(i), no construction, ground

[20] CalFire: Fire Hazard Severity Zones in Local Responsibility Areas-Imperial County Map

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

disturbance or operation is anticipated that would result in substantial increase of the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Any impact would be considered less than significant.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or; ☐ ☐ ☒ ☐

iii) It is not expected or anticipated that the proposed battery recycling facility would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage system or provide substantial sources of polluted runoff. As of now, the project does not anticipate any development or ground disturbance that would alter the grading of the land. Any future proposed grading or planned stormwater drainage systems will require drainage application, review, and approval from the Imperial County Public Works Department and Imperial Irrigation District. Compliance with these agencies' requirements would ensure that any runoff water impacts would be reduced to less than significant levels.

(iv) impede or redirect flood flows? ☐ ☐ ☒ ☐

iv) The proposed project is for the operation of a battery recycling facility within an existing 8,000 sq. ft. building and is not expected to impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map[21], the proposed project site is located within "Zone X" of flood map 06025C1734C, effective September 26, 2008. Additionally, a reviewed and approved grading/drainage letter is to be required by the Imperial County Department of Public Works. Therefore, compliance with ICDPW's standards would bring any impact to less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ☐ ☐ ☒ ☐

d) The proposed battery recycling facility is not located in a flood hazard, tsunami, or seiche zones and therefore, is not expected to risk release of pollutants due to project inundation. Additionally, as previously stated on item (X)(c)(iv) above, the proposed project site is located within "Zone X" of flood map 06025C1734C. In the future need of construction, compliance with ICDPW's and the California Building Code standards would contribute to lowering any impacts to less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ☐ ☐ ☒ ☐

e) The proposed project is not expected to conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. As previously stated on item (X)(c) above, the proposed project would require a grading letter approved by the Imperial County Public Works Department and adherence to Imperial Irrigation District requirements. Any impacts are expected to be less than significant.

XI. *LAND USE AND PLANNING Would the project:*

a) Physically divide an established community? ☐ ☐ ☐ ☒

a) The proposed project is for the operation of a battery recycling facility within an existing 8,000 sq. ft. building located in a parcel identified as M-1-U (Light Industrial with an Urban Overlay) per zone map 4 and as Urban by the Imperial County General Plan, and would not physically divide an established community; therefore, no impacts are expected.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☐ ☒

b) As previously mentioned in (XI)(a), the project site is in an area identified by the Imperial County General Plan as Urban; the project is consistent with the County's General Plan Land Use Element and the Land Use Ordinance with the approval of a Conditional Use Permit. The proposed project does not conflict with any applicable land use plan, policy and regulation. No impacts are anticipated.

[21] Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map https://msc.fema.gov/portal/search?AddressQuery=851%20pitzer%20road%20heber%20ca#searchresultsanchor

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

XII. ***MINERAL RESOURCES*** ***Would the project:***

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ☐ ☐ ☐ ☒

a) The proposed project does not anticipate the removal of mineral resources, and it is not located within the boundaries or vicinity of an active mine per Imperial County General Plan's Conservation and Open Space Element, "Existing Mineral Resources Map"-Figure 8[7F]. No impacts are expected.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ☐ ☐ ☐ ☒

b) Per the Imperial County General Plan, Conservation and Open Space Element, Figure 8: Existing Mineral Resources[7F], the proposed project site is not located within an area known to be classified as a "regionally important mineral resource". Therefore, it is not expected that the proposed project would result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impact is expected.

XIII. ***NOISE*** ***Would the project result in:***

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ☐ ☐ ☒ ☐

a) Noise levels are consistent with other light industrial uses with noise from the battery crusher not exceeding 60dBA. The battery recycling facility is 1,300 feet from the closest classroom at Holtville High School and 700 feet from the nearest residence on Zenos Road. The battery crusher is located within an enclosed building, and as such, noise generated by the project will not be audible to sensitive receptors; therefore, the impact is expected to be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

b) No major vibration-including activities, such as pile driving or blasting, will be conducted at the project facility. Some equipment may cause minor noise and vibration; however, no major vibrations or noises are expected to be audible by sensible receptors, therefore the impact is expected to be less than significant.

c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels? ☐ ☐ ☐ ☒

c) As previously stated on item (IX)(e) above, the proposed project is not located within an airport land use plan or private airstrip according to the Imperial County Airport Land Use Compatibility Maps[20]. The nearest airport in the vicinity is Holtville Airport located approximately six (6) miles east from the proposed project site; therefore, exposure to periodic noise emissions during aircraft takeoff and landing operations are not expected. Any impacts are expected to be less than significant.

XIV. ***POPULATION AND HOUSING*** ***Would the project:***

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)? ☐ ☐ ☐ ☒

a) The proposed project does not include any housing or public infrastructure that may include substantial unplanned population growth in an area either directly or indirectly. Therefore, no impact is expected.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

b) The proposed project will be located within a currently developed Industrial lot zoned M-1-U (Light Industrial with Urban Overlay) with multiple existing operations. Said parcel is not zoned for the allowance of housing. Therefore, there will be no displacement of housing. No impact is expected.

XV. *PUBLIC SERVICES*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: ☐ ☐ ☒ ☐

a) The proposed project is not expected to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. It is expected that compliance with Imperial County Fire Department requirements would lessen any public service impacts to less than significant levels.

1) Fire Protection? ☐ ☐ ☒ ☐

1) The proposed battery recycling facility is not expected to create a substantial adverse impact to fire protection. Impacts are expected to be less than significant. The applicant shall comply with Imperial County Fire Department requirements, to lessen any impact to less than significant levels.

2) Police Protection? ☐ ☐ ☒ ☐

2) The proposed battery recycling facility is not expected to create a substantial adverse impact to police protection. However, should any police protection be required, both the California Highway patrol and Sheriff's Office South County Patrol have active policing and patrol operations in the area[22]. Impacts are expected to be less than significant.

3) Schools? ☐ ☐ ☐ ☒

3) The proposed battery recycling facility does not expect an increment in population that would require the construction of new educational facilities; therefore, no impacts are anticipated.

4) Parks? ☐ ☐ ☐ ☒

4) The proposed battery recycling facility would not result in a substantially adverse physical impact to existing parks. No impacts are anticipated.

5) Other Public Facilities? ☐ ☐ ☒ ☐

5) The proposed project is not expected to result in a demand for other public facilities services. As such, implementation of the proposed project would not adversely affect other public facilities or require the construction of new or modified public facilities. Less than significant impacts are anticipated.

XVI. *RECREATION*

a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ☐ ☐ ☐ ☒

a) The proposed project is for the operation of a battery recycling facility within an existing 8,000 sq. ft, located in a developed industrial parcel with active industrial operations. Subsequently, the proposed operation would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impacts are expected.

b) Does the project include recreational facilities or require the ☐ ☐ ☐ ☒

[22] Imperial County Sheriff's Office Operations Map https://icso.imperialcounty.org/operations/

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construction or expansion of recreational facilities which might have an adverse effect on the environment?

b) The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment. Also, as previously stated on item (XVI)(a), there are no regional parks within the proposed project area; therefore, no impacts are expected.

XVII. *TRANSPORTATION* *Would the project:*

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ☐ ☐ ☒ ☐

a) A maximum of two trucks per day will be delivered to the site and up to two trucks will be transporting the crushed materials from the site to San Diego for export to Japan. No conflict is expected to occur with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, we can expect a less than significant impact.

b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)? ☐ ☐ ☒ ☐

b) The proposed project location is approximately 1 mile away from the intersection between Thiesen Road and State Highway 115, it does not appear to conflict or be inconsistent with the CEQA guidelines section 15064.3 (b). Any impacts are expected to be less than significant.

c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☒ ☐

c) The proposed battery recycling facility does not appear to substantially increase hazards due to a geometric design feature or incompatible uses. Operations are being proposed within existing structures. Any impact would be considered less than significant.

d) Result in inadequate emergency access? ☐ ☐ ☒ ☐

d) The proposed project would not result in inadequate emergency access. Additionally, no change on existing land use nor zoning are proposed. Access to the proposed project site from Melon Road would be suitable for emergency response vehicles. Less than significant impacts are expected.

XVIII. *TRIBAL CULTURAL RESOURCES*

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is: ☐ ☐ ☒ ☐

a) According to the Imperial County General Plan's Conservation and Open Space Element, Figure 6[8], the proposed project site is not located within any known Native American cultural sensitivity area. Additionally, as previously discussed in section (V)(a) above, the Quechan and Campo Band of Mission Indian Tribes have requested to be consulted under Assembly Bill 52. Consultation letters were sent to the Quechan and Campo Band of Mission Indian Tribes on April 11, 2025. Furthermore, the proposed project would be located within an existing building in a parcel with active industrial operations and multiple buildings. No documented nor known archeological resources have been identified in this particular location. Therefore, less than significant impacts are expected.

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or ☐ ☐ ☒ ☐

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

(i) According to the California Historic Resources[23] in Imperial County, the proposed project site is not listed or seem to be eligible under the Public Resources Code Section 21074 or 5020.1 (k); therefore, any impacts are expected to be less than significant.

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth is subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. ☐ ☐ ☒ ☐

(ii) As mentioned on item (XVIII)(a) Imperial County General Plan's Conservation and Open Space Element[7] does not identify the project location as a "Known Area of Native American Cultural Sensitivity". Additionally, on item (XVIII)(a-i), there are no records of the project site being listed or near a location listed under Public Resources Code Section 21074 or 5020.1(k). Furthermore, as described in Public Resources Code 5024.1, subdivision (c), the proposed project location is not known to be associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage, nor the lives of persons important in our past. The existing industrial development within the project location and the surrounding properties do not embody distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values. There are also no records of the project location yielding information important in prehistory or history. Based on this information, any impact would be expected to be less than significant.

XIX. ***UTILITIES AND SERVICE SYSTEMS*** ***Would the project:***

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? ☐ ☐ ☒ ☐

a) Domestic water is provided to the site via an existing water pipeline from the City of Holtville. A 12" PVC pipeline is being proposed to serve the fire protection demand of the project site which will connect from existing 6" ACP pipeline on Melon and 8th Street and looping to another existing pipeline approximately 660' south. A fire sprinkler system will be installed within the proposed battery recycling facility.
The project site is currently connected to an existing 8" VCP sewer pipeline along Melon Road serviced by the City of Holtville. The applicant will have to meet the requirements set forth by the service providers and follow the established procedures to obtain services to the project location. The project does not propose at this point new or upgrades to any of these systems nor does the project require or will result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects. Any impact would be considered less than significant.

b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? ☐ ☐ ☒ ☐

b) The project would receive water from the City of Holtville and appear to have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years, as no mayor increase in the use of water is expected. Nonetheless, the applicant will have to meet the requirements set forth by the City of Holtville in the event of any required expansion and assess any potential impact. Any impacts are expected to be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☐ ☒ ☐

c) The project site is currently connected to an existing 8" VCP sewer pipeline along Melon Road serviced by the City of

[23] California Historic Resources in the Imperial County https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

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Holtville. It does not appear to have an impact on any wastewater treatment provider. Therefore, less than significant impacts are expected.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ☐ ☐ ☒ ☐

d) The proposed project does not appear to generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Any impacts are expected to be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? ☐ ☐ ☒ ☐

e) The project will be required to comply with all federal, state and local management and reduction statutes and regulations related to solid waste. Any impacts are expected to be less than significant.

XX. *WILDFIRE*

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☒ ☐

a) The proposed battery recycling facility is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and it is designated as a Local Responsibility Area (LRA) zone per the California Department of Forestry and Fire Projection Map for Imperial County Draft Fire Hazard Draft Severity Zones in LRA[20]. Additionally, Fire Department access and access roads shall be in accordance with the California Fire Code Chapter 5, with a width of at least 20 feet and all-weather surface capable of supporting fire apparatus. Fire Department access roads will be provided with a turnaround approved by Imperial County Fire Department; as well as an approved fire safety and evacuation plan shall be developed and approved by the Fire Department. The evacuation plan shall be in accordance with California Fire Code Chapter 4. Compliance with the Imperial County Fire Department would bring any impact to be considered less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ☐ ☐ ☒ ☐

b) According to CalFire, the proposed project site is designated as "Local Responsibility Area (LRA) Unzoned"[20]. Also, per Imperial County's Seismic and Public Safety Element[16], Figure 6 – "Fire Hazard Severity Zones", the proposed project site is not located within a fire hazard zone. Additionally, as previously stated on section (IX)(g) above, the proposed project site is designated as Local Responsibility Area (LRA) Unzoned and not located within a Fire Hazard Severity Zone (VHFHZ). Furthermore, as previously stated on section (IX)(f), the applicant would meet and adhere to ICFD's standards, requirements, and recommendations; therefore, impacts due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire are expected to be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ☐ ☐ ☒ ☐

c) As previously stated under item (XV)(a)(1) – "Public Services" above, the proposed project will be required to follow the Imperial County Fire Department requirements and based on its design, the project may be required to install the appropriate infrastructure such as a private or a public source of water for fire suppression purposes such as pressurized hydrants. Adherence and compliance with Imperial County Fire Department requirements will bring any impacts to less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ☐ ☐ ☒ ☐

d) As previously stated on item (VII)(a)(4) above, per Imperial County General Plan's Seismic and Public Safety Element[14], "Landslide Activity Map"-Figure 2, the proposed project is not located within a landslide activity area. The topography within the proposed project site is generally flat. Any future development, proposed project design and subsequent construction will be subjected to compliance with the latest edition of the California Building Code as well as to go through a ministerial

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building permit review. Adherence and compliance with the California Building Code standards and regulations would bring any impact to less than significant levels.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

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	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?**	☐	☐	☑	☐
b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**	☐	☐	☑	☐
c) **Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**	☐	☐	☑	☐

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IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planning Division Manager
- Luis Bejarano, Planner II
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- Imperial Irrigation District
- County Executive Office
- Fort Yuma Quechan Indian Tribe
- Campo Band of Mission Indians Tribe

(Written or oral comments received on the checklist prior to circulation)

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V. REFERENCES

1. Imperial County General Plan: Circulation and Scenic Highway Element
   https://www.icpds.com/assets/planning/circulation-scenic-highway-element-2008.pdf

2. California State Scenic Highway System Map
   https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

3. Imperial County Title 9, Division 3 (Site & Design Standards). title-9-div-3-2014.pdf

4. Imperial County Title 9, Division 25 (Zoning Maps/Amendments) title-9-div-25-2015.pdf

5. Imperial County APCD Comment letter dated April 25, 2025.

6. Imperial County General Plan: Conservation and Open Space Element
   https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf

7. Imperial County General Plan: Conservation and Open Space Element
   https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf
   a) Figure 1: Sensitive Habitat Map
   b) Figure 2: Sensitive Species Map
   c) Figure 3: Agency-Designated Habitats Map
   d) Figure 5: Areas of Heighten Historic Period Sensitivity Map
   e) Figure 6: Known Areas of Native American Cultural Sensitivity Map
   f) Figure 8: Existing Mineral Resources Map

8. National Wetlands Inventory Map: Surface Waters and Wetlands
   https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

9. National Water Information System: Mapper
   https://maps.waterdata.usgs.gov/mapper/index.html

10. California Sustainable Groundwater Management Act (SGMA) Data Viewer
    https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#currentconditions

11. Imperial Irrigation District, Comment Letter dated April 22, 2025

12. California Department of Conservation: Fail Activity Map https://maps.conservation.ca.gov/cgs/fam/

13. United States Geological Survey's Quaternary Faults Map
    https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf

14. Imperial County General Plan Seismic and Public Safety Element https://www.icpds.com/assets/GPA21-0004-Seismic-and-Public-Safety-Element-11-22-2022.pdf

15. California Tsunami Data Maps https://www.conservation.ca.gov/cgs/tsunami/maps

16. U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Maps
    https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

17. Department of Toxic Substances Control comment letter, dated April 25, 2025

18. California Department of Toxic Substances Control EnviroStor https://www.envirostor.dtsc.ca.gov/public/

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19. Imperial County Airport Land Use Compatibility Maps
https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=46f7796b2dfb4a6db5311d7892f0b411

20. CalFire: Fire Hazard Severity Zones in Local Responsibility Areas – Imperial County Map
https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map-2022/fire-hazard-severity-zone-maps---lra/imperial_lra_draft_fhszl06_1_map13.pdf?rev=ae37a06cab87486b8814874bfa7cfb16&hash=4B1355741F43E2EE3852E0A4A20DE497

21. Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map
https://msc.fema.gov/portal/search?AddressQuery=851%20pitzer%20road%20heber%20ca#searchresultsanchor.

22. Imperial County Sheriff's Office Operations Map https://icso.imperialcounty.org/operations/

23. California Historic Resources: Imperial County
https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

24. California Farmland Mapping & Monitoring Program: Imperial County Important Farmland Map 2018
https://maps.conservation.ca.gov/DLRP/CIFF/

25. California Williamson Act Enrollment Finder
https://maps.conservation.ca.gov/dlrp/WilliamsonAct/

26. National Wetlands Inventory Map: Surface Waters and Wetlands
https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

27. U.S. Fish & Wildlife (USFWS) Critical Habitat for Threatened & Endangered Species Mapper
https://www.arcgis.com/apps/Embed/index.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77&extent=-124.1522,38.0501,-121.4496,39.2098&zoom=true&scale=true&details=true&disable_scroll=true&theme=light

28. California Building Standards Commission, 2022 California Building Code.
California Code of Regulations, Title 24, Part 2, Volume 2 of 2.

29. Imperial County General Plan: Noise Element
https://www.icpds.com/assets/planning/noise-element-2015.pdf

30. Imperial County Sheriff's Office: Patrol Operations Map
https://icso.imperialcounty.org/operations/

31. Imperial County Land Use Ordinance (Title 9), Division 16: Flood Damage Prevention Regulation
https://www.icpds.com/assets/planning/renewable-energy-and-transmission-element-2015.pdf.

32. California Department of Conservation-Mineral Land Classification
https://maps.conservation.ca.gov/cgs/minerals/?page=All-Data

NEGATIVE DECLARATION – County of Imperial

The following Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.

Project Name: Conditional Use Permit (CUP) #25-0003
Initial Study (IS) #25-0009
Omega Harvested Metallurgical Battery Recycling Facility

Project Applicant: Omega Harvested Metallurgical

Project Location: The proposed project is located at 2255 Melon Road, Holtville, CA 92250, also identified under Assessor's Parcel Number 045-570-088-000, and legally described as PAR 2 PER LLA#234, 21.36AC. The property is approximately 1 mile east of State Highway 115 and approximately 545 ft south of Alamo Rd.

Description of Project:

The applicant has submitted a CUP application for a battery recycling facility to operate in an existing 8,000 sq. ft. building located at 2255 Melon Road, in an unincorporated area of the County, adjacent to the City of Holtville. Property identified under Assessor's Parcel Number 045-570-088-000. The proposed operation will exclusively process inert, inactive lithium batteries that have been discharged at a facility in LA County. These batteries will be delivered to the site in Holtville by truck, Monday through Friday, with daily deliveries of approximately 40,000 lbs and a maximum of approximately 120,000 lbs. Deliveries are expected to occur around 11:00 am, while exports will take place around 9:00 am. A maximum of two trucks will transport the crushed materials from the site to San Diego for export to Japan. Crushed batteries will be stored on-site for no more than 48 hours. The facility's operating hours will be Monday through Friday, from 8:00 am to 5:00 pm approximately.

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VI. FINDINGS

This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this Negative Declaration based upon the following findings:

☒ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A MITIGATED NEGATIVE DECLARATION will be prepared.

If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.

NOTICE

The public is invited to comment on the proposed Negative Declaration during the review period.

9-11-2025 for

Date of Determination Jim Minnick, Director of Planning & Development Services

The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.

Applicant Signature 9/11/25 Date

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SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

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IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

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CUP25-0003 / IS25-0009

COMMENT LETTERS

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COUNTY OF IMPERIAL

DEPARTMENT OF PUBLIC WORKS

155 S. 11th Street
El Centro, CA 92243

Tel: (442) 265-1818
Fax: (442) 265-1858

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https://twitter.com/CountyDpw/

Public Works works for the Public

ICDPW

May 8, 2025

Mr. Jim Minnick, Director
Planning & Development Services Department
801 Main Street
El Centro, CA 92243

RECEIVED
By Imperial County Plannning & Development Services at 1:18 pm, May 08, 2025

Attention: Luis Bejarano, Planner I

SUBJECT: **CUP 25-0003 Omega Harvested Metallurgical**
Located on 2255 Melon Rd, Holtville, CA 92250
APN 045-570-088

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on April 11, 2025, for the above-mentioned project. The applicant proposes a battery recycling facility to operate in an existing 8,000 sq. ft. building. The proposed operation will exclusively process inert, inactive lithium batteries that have been discharged at a facility in LA County.

Our Department staff has reviewed the package information, and all of the following comments shall be Conditions of Approval as described:

1. A record of survey is required and shall be submitted to this Department for review and approval, per Section 8762(b)(4)(5) of the Professional Land Surveyors' Act, (paraphrasing) "a record of survey is required to be filed after making a field survey that establishes one or more lines that are not shown on any subdivision map, official map, or record of survey, the positions of which are unascertainable from inspection of a subdivision map, official map, or record of survey".

2. Street improvement plans shall be submitted to the Department of Public Works for review and approval. These plans shall be prepared per the 'Engineering Design Guidelines Manual for the Preparation and Checking of Street Improvement, Drainage, and Grading Plans within Imperial County'. The street improvement plans shall detail all necessary improvements, which may include, but not be limited to, streets, curbs, gutters, driveways, sidewalks, and asphalt paving within the County right-of-way impacted by the water line installation.

3. An encroachment permit shall be secured from the Department of Public Works for all work within County Right-of-Way related to the water line installation, as per Chapter 12.12 - Excavations on or Near a Public Road of the Imperial County Ordinance.

4. A **non-contiguous public sidewalk** shall be constructed along the frontage meeting the standards outlined in the **'Engineering Design Guidelines Manual for the**

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Preparation and Checking of Street Improvement, Drainage, and Grading Plans within Imperial County'. The specific width and design shall be subject to review and approval by the Department of Public Works.

5. The **primary access driveway** connecting to the County road shall be constructed of **asphalt concrete pavement per County of Imperial Detail of Commercial Driveway to Connection Rural Road Connection - Dwg. No. 410B**.

INFORMATIVE

- All solid and hazardous waste shall be disposed of in approved solid waste disposal sites in accordance with existing County, State and Federal regulations (Per Imperial County Code of Ordinances, Chapter 8.72).
- The project may require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior county approval of onsite grading plan (40 CFR 122.28).

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

John A. Gay, PE
Director of Public Works

By:

Atondo V.

Veronica Atondo, PE, PLS
Deputy Director of Public Works - Engineering

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Office of the Agricultural Commissioner
Sealer of Weights and Measures
852 Broadway, El Centro CA 92243

Jolene Dessert
Commissioner / Sealer

Rachel Garewal
Asst. Commissioner / Sealer

March 15, 2025

To Landscapers, Nurseries, Retailers, Homeowners, and Planning Departments:

This letter is to remind you of the legal requirements you must follow for transporting plants and plant materials into Imperial County. There are numerous quarantines in place to safeguard landscape plants, the agricultural industry of Imperial County, and the whole of California from exotic pests and diseases. Please see the attached "Summary of Shipment Requirements and Quarantines," for information on quarantines that most commonly affect Imperial County.

All plants coming into Imperial County are required by law to be held for inspection by the Agricultural Commissioner prior to planting or being made available for sale. This applies to plants brought in by any party, including commercial businesses and homeowners. It is very important that our office is notified immediately upon arrival of any plant shipment. You must not commingle incoming shipments with other plants until after they are inspected and released by our office.

Call our office as early as possible to schedule an inspection. Inspectors are usually available Monday through Friday, 8:00 a.m. to 4:00 p.m. If you intend to bring a shipment in on a weekend or County holiday, please call ahead to see if an inspector will be available.

If you have any questions or concerns, our office is here to help. Please call us at (442) 265-1500.

Sincerely,

Nelson Perez
Deputy Agricultural Commissioner
Pest Detection and Eradication

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Summary of Shipment Requirements and Quarantines

- All nursery stock must be accompanied by valid proof of ownership.
- Nursery stock shipments may be released by phone at the discretion of the Agricultural Commissioner.
- Landscapers and other entities that have a growing ground or holding yard where nursery stock is held prior to delivery to the planting site must be licensed as a nursery.

Pierce's Disease and the Glassy-winged Sharpshooter

The Pierce's Disease Control Program (PDCP) exists in California to prevent the artificial movement and spread of the glassy-winged sharpshooter (GWSS), a vector of Pierce's Disease. Pierce's Disease is caused by the bacterium Xylella fastidiosa. It is deadly to many plant species, and its vector, GWSS, has an extensive list of hosts including many agricultural crops and landscape plants. Imperial County is the only Southern California County not infested with GWSS.

It is unlawful to bring plants into Imperial County from inside the GWSS-infested area; however, nurseries located within the infested area may do so under a compliance agreement from their county's Agricultural Commissioner. It is lawful to bring plants in from a nursery within the infested area so long as they meet the terms of their compliance agreement. These terms include (but are not limited to):

- Notify the Imperial County Agricultural Commissioner (CAC) at least 24 hours prior to shipment.
- Shipment paperwork is stamped with a GWSS compliance agreement number.
- Shipment is accompanied by a "Blue Tag" shipping permit stating "Warning – Hold for Inspection".
- Shipment is accompanied by a valid Certificate of Quarantine Compliance (CQC), if applicable.

For additional information regarding the PDCP or GWSS, please visit https://www.cdfa.ca.gov/pdcp/.

Other Plants with Quarantine Restrictions

- All **citrus species** from other California counties and other states.
- All **palms of the Phoenix genus**, including Pygmy Date Palms (P. roebelenii), except when originating from certain areas of Riverside County.
- Nursery stock originating in **Florida** (specifically Burrowing and Reniform Nematode [3 CCR § 3271] and Imported Fire Ant [7 CFR § 301.81]).
- Nursery stock originating in **Arizona** (specifically Ozonium Root Rot [3 CCR § 3261]).
- All **lettuce plants** are prohibited unless tested for Lettuce Mosaic Virus.
- All plants shipped *from* Imperial County must be certified free from Ozonium Root Rot by the CAC.

Penalties for Failure to Comply with Requirements (California Food and Agricultural Code [FAC])

Any violation of quarantine requirements is an infraction punishable by a fine of one thousand dollars ($1,000) for the first offense. Second and subsequent offenses within three years are punishable as misdemeanors. (FAC § 5309)

In addition to any other penalties, any person violating quarantine requirements may be liable civilly in an amount not exceeding ten thousand dollars ($10,000) for each violation. (FAC § 5310)

In lieu of civil action, the Agricultural Commissioner (CAC) may levy a civil penalty of up to two thousand five hundred dollars ($2,500) for each violation. (FAC § 5311)

Anyone who negligently or intentionally violates any state or federal law or regulation by importing any plant or other article infested by pest or disease and causes an infestation or causes the spread of an existing infestation beyond quarantine boundaries is liable civilly up to twenty-five thousand dollars ($25,000) for each act that constitutes a violation. (FAC § 5028)

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150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

AIR POLLUTION CONTROL DISTRICT

April 25, 2025

RECEIVED
By Imperial County Plannning & Development Services at 8:27 am, Apr 28, 2025

Jim Minnick, Director
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

SUBJECT: Conditional Use Permit 25-0003 – Omega Harvested Metallurgical

Dear Mr. Minnick:

The Imperial County Air Pollution Control District (Air District) would like to thank you for the opportunity to review and comment on Conditional Use Permit (CUP) 25-0003 (Project). The project proposes a battery recycling facility to process inert, inactive lithium batteries that have been discharged at a facility in LA County. The batteries will be delivered by truck, with daily deliveries of approximately 40,000 lbs and a maximum of 120,000 lbs. Crushed batteries will be stored on-site for no more than 48 hours. The project is proposed to operate within an existing building located at 2255 Melon Rd., Holtville also identified as Assessor's Parcel Number 045-570-088.

The project and any future developments must comply with all Air District Rules & Regulations and the project's use of crushing equipment may be subject to Air District permitting requirements under Air District Rules 201, 202, 207, & 208. This will require the applicant submit an application for engineering review of the project, however, the Air District has additional questions regarding the project and requests the applicant contact our office to schedule a discussion to help ensure compliance with all rules and permitting requirements. Please contact Monica Soucier, Planning and Monitoring Division Manager, and Jesus Ramirez, Engineering and Permitting Division Manager, at our office via phone (442) 265-1800 or via email at monicasoucier@co.imperial.ca.us and jesusramirez@co.imperial.ca.us to schedule the discussion.

Finally, the Air District requests a copy of the draft CUP prior to recording for review.

For your convenience, all Air District rules and regulations can be accessed online at https://apcd.imperialcounty.org/rules-and-regulations and permitting forms can be accessed at https://apcd.imperialcounty.org/engineering/#engpermiting. Should you have any additional

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questions or concerns please feel free to contact the Air District by calling our office at (442) 265-1800.

Respectfully,

Ismael Garcia
Environmental Coordinator

Reviewed by,
Monica Soucier
APC Division Manager

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RECEIVED
By Imperial County Planning & Development Services at 7:26 am, May 13, 2025

Imperial County

Public Health Department

Janette Angulo, M.P.A
Director

Stephen Munday, M.D., M.P.H., M.S.
Health Officer

May 12, 2025

Luis Bejarano
Imperial County Planning & Development Services
801 Main Street
El Centro, CA92243

Subject: Comment Letter for CUP#25-0003 – Proposed Lithium Battery Crushing Operation by Omega Harvested Metallurgical

Mr. Bejarano,

The Environmental Health Division (EHD) is in receipt of the request for comment letter for a proposed lithium battery crushing operation. The proposed project applicant, Omega Harvested Metallurgical, is requesting a conditional use permit (CUP#25-0003) to process inert, inactive lithium batteries at 2255 Melon Road, Holtville (APN: 045-570-088).

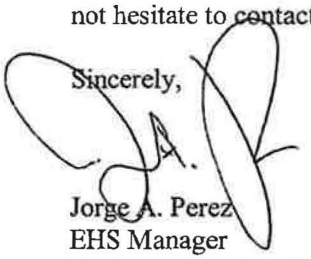
Based on the brief project description provided, EHD has the following comments:

1. Please provide a detailed description of the process used to inactivate the lithium batteries and render them inert. Include any verification or testing protocols used to confirm inert status.
2. Describe the applicant's procedures for ensuring that all lithium batteries have been fully inactivated and meet inert status criteria prior to handling, transport, or processing.
3. Describe the procedures that will be followed if a lithium battery is discovered to have not been properly rendered inert. Include details on how the battery will be safely managed, isolated, reported, and whether additional verifications or corrective actions will be taken from other batteries in the same batch.
4. Will all inactive lithium batteries come from the same facility in the Los Angeles area, or are they expected to come from multiple facilities?
5. What types of batteries are being brought to this facility?
6. How will the electrode, and any other possible liquid or solid waste, be handled by the facility?
7. What type and quantities of residual waste are expected with this process?
8. Additional permitting requirements may be required through the Department of Toxic Substances Control, DTSC Imperial CUPA, and/or CalRecycle. Applicant shall contact these agencies to determine if regulatory approvals and/or permits are required. A summary of the findings and determinations from each agency shall be provided as part of the project documentation.

If you or the applicant have any questions or need clarification on any of the items listed above, please do

not hesitate to contact our office.

Sincerely,



Jorge A. Perez
EHS Manager
Environmental Health Division

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Luis Bejarano

From: Kelley, Ryan <RKelley@icso.org>
Sent: Wednesday, April 23, 2025 9:23 AM
To: Luis Bejarano
Cc: Gerardo Quero; Diana Robinson; Michael Abraham
Subject: RE: CUP25-0003 / IS25-0009 - OMEGA HARVESTED METALLURGICAL - BATTERY RECYCLING FACILITY

CAUTION: This email originated outside our organization; please use caution.

Luis, can we just confirm with the applicant a few items:

1. I understand that the batteries sent to the facility for recycling are inert. Can the applicant just confirm that their condition will eliminate the possibility of a fire, explosion or any other public safety hazard, as it relates to their entire process to include receiving, staging, recycling and loading for transport back to San Diego.
2. The batteries are being transported from LA, past San Diego to be recycled in Imperial County, at which point they are being transported back to San Diego for shipping. Is San Deigo not allowing the applicant to recycle the batteries in their County? What is the reason they are bypassing San Diego to have them recycled in Imperial County, is it costs, environmental concerns, permitting process from San Diego County?

Ryan Kelley | Chief Deputy

Imperial County Sheriffâ€™s Office
328 Applestill Road
El Centro, Ca. 92243
OFFICE (442) 265-2003 | **CELL** (760) 455-0215



From: Luis Bejarano <luisbejarano@co.imperial.ca.us>
Sent: Tuesday, April 22, 2025 3:36 PM
To: Kelley, Ryan <RKelley@icso.org>
Cc: Gerardo Quero <gerardoquero@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>
Subject: CUP25-0003 / IS25-0009 - OMEGA HARVESTED METALLURGICAL - BATTERY RECYCLING FACILITY

CAUTION: This email originated outside our organization; please use caution.

Good afternoon Chief Kelley,

I was made aware that you had some questions regarding this project (CUP25-0003 – BATTERY RECYCLING FACILITY).
Please feel free to let me know if you would like to schedule a phone call to go over this project and review any information that you may have questions about.

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April 22, 2025

RECEIVED
By Imperial County Plannning & Development Services at 1:49 pm, Apr 22, 2025

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Omega Harvested Metallurgical Project; CUP25-0003/IS25-0009

Dear Mr. Bejarano:

On April 11, 2025, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on the Omega Harvested Metallurgical project; Conditional Use Permit No. 25-0003, Initial Study No. 25-0009. The applicant proposes to establish a battery recycling facility in an existing 8,000 sq. ft. building located at 2255 Melon Road near Holtville, CA (APN 045-570-088-000). The operation will process inert, inactive lithium batteries that have been discharged at a facility in Los Angeles County.

The IID has reviewed the application and has the following comments:

1. The existing building proposed for the project currently has electrical service provided by IID. However, if the project requires an electrical service upgrade, the applicant should be advised to contact Joel Lopez, IID project development planner, at 760-482-3444 or e-mail Mr. Lopez at JFLopez@IID.com, to initiate the customer service application process. In addition to submitting a formal application (available for download at http://www.iid.com/home/showdocument?id=12923), the applicant will be required to submit an AutoCAD file of site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to a project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to a project.

2. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.

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3. Applicant shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.

4. The project proponent will be required to provide and bear all costs associated with acquisition of land, rights of way, easements, and infrastructure relocations and realignments deemed necessary to accommodate the project. Any street or road improvements imposed by the local governing authority shall also be at the project proponent cost.

5. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project. In addition, the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties where no public access exists.

6. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at the website https://www.iid.com/about-iid/department-directory/real-estate. No foundations or buildings will be allowed within IID's right of way. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.

7. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

8. When the project goes through the CEQA compliance process, it is important to bear in mind that to address the project impacts to the electrical utility (i.e., the IID

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electrical grid), considered under the environmental factor "Utilities and Services" of the Environmental Checklist/Initial Study, to determine if the project would require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects; a circuit study/distribution impact study, facility study, and/or system impact study must be performed.

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Joanna Smith-Hoff – Deputy General Counsel
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

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COUNTY EXECUTIVE OFFICE

Rebecca Terrazas-Baxter
Assistant County Executive Officer
rebeccaterrazas-baxter@co.imperial.ca.us
www.co.imperial.ca.us

County Administration Center
940 Main Street, Suite 208
El Centro, CA 92243
Tel: 442-265-1001
Fax: 442-265-1010

April 14, 2025

RECEIVED
By Imperial County Plannning & Development Services at 10:30 am, Apr 14, 2025

TO: Luis Bejarano, Planning and Development Services Department

FROM: Rosa Lopez, Executive Office

SUBJECT: Request for Comments – Omega Harvested Metallurgical Project, CUP25-0003; APN 045-570-088-000

The County of Imperial Executive Office is responding to a request for comments: Omega Harvested Metallurgical Project, CUP25-0003; APN 045-570-088-000. The Executive Office would like to inform the developer of conditions and responsibilities of the applicant seeking a Conditional Use Permit (CUP). The following conditions will be written into the CUP, but not limited to:

- Sales Tax Guarantee. The permittee is required to have a Construction Site Permit reflecting the project site address, allowing all eligible sales tax payments are allocated to the County of Imperial, Jurisdictional Code 13998. The permittee will provide the County of Imperial a copy of the California Department of Taxation and Fee Administration (CDTFA) account number and sub-permit for its contractor and subcontractors (if any) related to the jobsite. Permittee shall provide in written verification to the County Executive Office that the necessary sales and use tax permits have been obtained, prior to the issuance of any grading permits and subsequently continue throughout the permitting process.

- Construction/Material Budget: The permittee will provide the County Executive Office a construction materials budget: an official construction materials budget or detailed budget outlining the construction and materials cost for the processing facility on permittee letterhead.

- At developers cost, the County Executive Office shall hire a third-party consultant to produce a Fiscal and Economic Impact Analysis & Job and Employment Analysis (FEIA & JEIA). Report shall be completed prior to project being placed on Planning Commission meeting.

Should there be any concerns and/or questions, do not hesitate to contact me.

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Luis Bejarano

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Saturday, April 12, 2025 8:11 AM
To: Aimee Trujillo; Luis Bejarano
Subject: Re: [EXTERNAL]:CUP25-0003/IS25-0009 - Request for Comments

CAUTION: This email originated outside our organization; please use caution.

Good morning,

This email is to inform you that the Historic Preservation Office of the Ft. Yuma Quechan Tribe does not wish to comment on this project.

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Friday, April 11, 2025 2:45 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Gilbert Rebollar <GilbertRebollar@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; David Lantzer <davidlantzer@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Carmen Zamora <carmenzamora@co.imperial.ca.us>; Veronica Atondo <VeronicaAtondo@co.imperial.ca.us>; Carlos Yee <CarlosYee@co.imperial.ca.us>; rkelley@icso.org <rkelley@icso.org>;

EEC ORIGINAL PRG

Luis Bejarano

From:	Daniel Tsosie <dtsosie@campo-nsn.gov>
Sent:	Sunday, April 13, 2025 1:03 PM
To:	Aimee Trujillo; Marcus Cuero
Cc:	Jim Minnick; Valerie Grijalva; Michael Abraham; Diana Robinson; Luis Bejarano; Adriana Ceballos; Aimee Trujillo; Allison Galindo; Kamika Mitchell; Kayla Henderson; Olivia Lopez
Subject:	Re: CUP25-0003/IS25-0009 AB 52 Letter

CAUTION: This email originated outside our organization; please use caution.

Hello, Aimee, on behalf of the Campo Band of Mission Indians, we are requesting government to government consultation.

Best regards,

DANIEL TSOSIE
Campo Band of Mission Indians
Cultural Resource Manager

Vice-Chairman- Kumeyaay Heritage Preservation Council
Secretary- Kumeyaay Diegueño Land Conservancy
Campo Band OMI KCRC representative

C: 619-760-6480
O: 619-478-9046 Ext. 278

Sent from my T-Mobile 5G Device
Get Outlook for Android

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Friday, April 11, 2025 3:29:33 PM
To: Marcus Cuero <marcuscuero@campo-nsn.gov>; Daniel Tsosie <dtsosie@campo-nsn.gov>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Allison Galindo <allisongalindo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>
Subject: CUP25-0003/IS25-0009 AB 52 Letter

Good afternoon,

Attached hereto please find the AB52 letter for **CUP25-0003/IS25-0009** (APN 045-570-088)

Should you have any questions, please feel free to contact Luis Bejarano at (442) 265-1736, or by email at luisbejarano@co.imperial.ca.us

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Luis Bejarano

From: asilva holtville.ca.gov <asilva@holtville.ca.gov>
Sent: Sunday, April 13, 2025 3:21 PM
To: Aimee Trujillo
Cc: Antonio Venegas; Jolene Dessert; Margo Sanchez; Belen Leon-Lopez; Monica Soucier; Jesus Ramirez; John Hawk; Rebecca Terrazas-Baxter; Rosa Lopez; Bari Bean; Gilbert Rebollar; Jorge Perez; Jeff Lamoure; Alphonso Andrade; Marco Topete; Sheila Vasquez-Bazua; Robert Menvielle; David Lantzer; Andrew Loper; Carmen Zamora; Veronica Atondo; Carlos Yee; Rkelley@icso.org; Fred Miramontes; Robert Benavidez; dvargas@iid.com; nwells holtville.ca.gov; achavez holtville.ca.gov; jeorge@theholtgroup.net; celso@husd.net; robert.krug@dtsc.ca.gov; dave.kereazis@dtsc.ca.gov; ceqareview@dtsc.ca.gov; marcuscuero@campo-nsn.gov; dtsosie@campo-nsn.gov; historicpreservation@quechantribe.com; tribalsecretary@quechantribe.com; Jim Minnick; Michael Abraham; Diana Robinson; Luis Bejarano; Adriana Ceballos; Allison Galindo; Kamika Mitchell; Kayla Henderson; Olivia Lopez; Valerie Grijalva; Aimee Trujillo
Subject: Re: CUP25-0003/IS25-0009 - Request for Comments

CAUTION: This email originated outside our organization; please use caution.

We have nothing pending or any issues with the above mentioned address.

Thank u
Alex
Sent from my iPhone

On Apr 11, 2025, at 2:45 PM, Aimee Trujillo <aimeetrujillo@co.imperial.ca.us> wrote:

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

Good afternoon,

Please see attached Request for Comments packet for **CUP25-0003 / IS25-0009 (2255 Melon Road, Holtville, CA 92250) Omega Harvested Metallurgical**

Comments are due by **April 25th, 2025 at 5:00PM**.

In an effort to increase the efficiency at which information is distributed and reduce paper usage, the Request for Comments packet is being sent to you via this email.

Should you have any questions, please feel free to contact Luis Bejarano at (442) 265-1736 or submit your comment letters to ICPDScommentletters@co.imperial.ca.us.

Thank you,

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Luis Bejarano

From: Luis Bejarano
Sent: Monday, April 14, 2025 1:21 PM
To: Krug, Robert@DTSC; David Black
Cc: Gerardo Quero; Diana Robinson; Michael Abraham; Aimee Trujillo
Subject: RE: Proposed Projects

Good afternoon Robert,

Thank you for sharing this information. I will forward this to the applicant and follow up with any additional information that may come.

Thank you!

Luis Bejarano
Planner I
Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243
luisbejarano@co.imperial.ca.us
Phone (442) 265-1736

From: Krug, Robert@DTSC <Robert.Krug@dtsc.ca.gov>
Sent: Monday, April 14, 2025 1:12 PM
To: David Black <DavidBlack@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>
Subject: Proposed Projects

CAUTION: This email originated outside our organization; please use caution.

For any proposed projects:
If they have Hazardous Materials above thresholds, any Hazardous Wastes, Aboveground Petroleum Tanks, Underground Petroleum Tanks, or meet CalARP thresholds, they must have an approved CERS account with the DTSC Imperial CUPA prior to operation.
Bob

Robert Krug
Supervisor / Senior Environmental Scientist
Department of Toxic Substances Control
Imperial CUPA
627 Wake Avenue
El Centro, CA 92243
Robert.Krug@dtsc.ca.gov
(760) 336-8919 Work
(760) 457-7376 Cell

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Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

April 25, 2025

RECEIVED
By Imperial County Plannning & Development Services at 8:29 am, Apr 25, 2025

Luis Bejarano
Planner I
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243
LuisBejarano@co.imperial.ca.us

RE: REQUEST FOR REVIEW AND COMMENTS FOR OMEGA HARVESTING METALLURGICAL CUP #25-003 / IS #25-009 DATED APRIL 11, 2025

Dear Luis Bejarano,

The Department of Toxic Substances Control (DTSC) reviewed the Omega Harvesting Metallurgical (Applicant) CUP #25-003 / IS #25-009 Request for Review and Comments document. The Applicant applied for a battery recycling facility (Site) to operate in an existing 8,000 square foot building located at 2255 Melon Road near Holtville, California. The Site will only be used to crush inert, inactive batteries, that have been discharged at a facility in Los Angeles County. Batteries will be processed in an industrial crusher that is mechanical in nature, and does not require water, fire, or chemicals to operate. The process takes around 24 hours to complete and crushed batteries will be stored on-site for no more than 48 hours. Once processed, the batteries will be exported to San Diego and then to Japan. DTSC recommends and requests consideration of the following comments:

1. If Per- and polyfluoroalkyl substances (PFAS) compounds are known or suspected to be present on site, engineering controls should be implemented to prevent their discharge to the sanitary sewer system or any potential infiltration to groundwater. Appropriate treatment,

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containment, and monitoring measures should be detailed in the design documents.

2. Provide documentation of all applicable air permits, including those related to the use of blowers or any emission-generating equipment associated with the volatile organic compound (VOC) control system. Ensure compliance with local, state, and federal air quality regulations.
3. Submit a detailed design document for the VOC control system. This should include specifications, emission estimates, technology control, and system performance criteria.
4. The battery rushing system should be designed as a closed system to contain all process materials and prevent the release of hazardous substances. Confirm that the entire process lifecycle is contained within the Site, aside from the arrival and shipment of batteries. Include contingency plans for spill or leak events and describe all safety and environmental control measures.
5. Provide a comprehensive process flow diagram (PFD) that illustrates each step of the battery recycling process. Clearly identify critical control points and areas with potential for human or environmental exposure to hazardous materials to include safety interlocks, containment systems, and monitoring points.
6. Identify all hazardous waste streams generated during the process, including electrolyte residues, heavy metals, and solvent residues. Provide waste characterization data, and details on off-site treatment or disposal in compliance with Resource Conservation and Recovery Act (RCRA) regulations.
7. Describe measures to prevent contamination of stormwater, including secondary containment, impervious surfaces, spill response procedures, and integration of the Site's activities.
8. Detail the engineering controls in place to protect workers from exposure to heavy metals, VOCs, and fine particulates that include ventilation

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strategies, Personal Protective Equipment requirements, and air monitoring protocols in high-risk areas. This can include HVAC systems, carbon filters, or air purifying units.

9. DTSC acknowledges that future involvement with the Site will be dependent on if hazardous waste is generated and later disposed of offsite. If hazardous waste is disposed of offsite, waste should be properly characterized, manifested and disposed of at a facility that is permitted and able to accept the waste.
10. DTSC would like to request further information on the following:
    a. Source of discharged batteries and further details regarding the discharge process.
    b. Waste code of incoming batteries (i.e. D001 or D003 waste).
    c. How intact or damaged batteries are contained to prevent releases of hazardous contaminants to the environment.
    d. How the Site is equipped or capable of managing lithium fires such as treated lithium metal batteries and the reactivity of the lithium metal (D003) and fires containing self-oxidizing and ignitable (D001) lithium-ion batteries.
    e. The safety measures are in place for the stockpiling of batteries to address the risk of thermal runaway such as separation of batteries and ensuring complete discharge prior to storage.
    f. How the electrolyte will be collected and appropriately characterized and managed as ignitable (D001) hazardous waste when the electrolyte is not removed from the battery prior to its arrival at the Site.

DTSC appreciates the opportunity to comment on the Omega Harvesting Metallurgical CUP #25-003 / IS #25-009. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via the CEQA Review Inbox for additional guidance.

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Sincerely,

Dave Kereazis

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Ben Strunk
Applicant
Omega Harvesting Metallurgical
Ben@ohm-inc.com

Marissa Woolsey M.S.
Hazardous Substances Engineer
SMRP-Engineering Services/ESPO
Department of Toxic Substances Control
Marissa.Woolsey@dtsc.ca.gov

Taylor Grose
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Spencer Eberhard
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Rachel Jesinger
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Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
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Scott Wiley
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Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

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Holtville
where tradition meets vision

621 E. Sixth Street, Holtville, Ca. 92250
(760) 356-2974 (760) 356-4936 fax
www. husd.net

RECEIVED
SEP 11 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

September 11, 2025

Jim Minnick, Director of Planning & Development Services
Planning & Development Services Dept.
County of Imperial
801 Main Street
El Centro, CA 92243

Re: *Omega Harvested Metallurgical's proposed facility*

Dear Mr. Minnick:

On behalf of the Holtville Unified School District we submit the following information strongly opposing a request for the Conditional Use Permit for Omega Harvested Metallurgical's proposed lithium battery processing facility, located just 1,000 feet from our Holtville High School at 755 Olive Ave., Holtville, CA 92250. Locating a hazardous-materials processing site next to a school is fundamentally incompatible with school environments.

Holtville High School is a sensitive receptor under California law. (Health and Safety Code § 42705.5.) Schools are legally recognized as sensitive receptors under the California Environmental Quality Act (CEQA). Locating a facility that processes lithium batteries so close to Holtville High School poses unacceptable risks. The proposed 1,000-foot buffer is inadequate given the hazards of storage, crushing, and transport of battery materials.

While the proposal states the batteries are "inert inactive," the crushing process poses a risk of releasing hazardous materials. Lithium-ion batteries contain toxic and carcinogenic materials such as lithium salts, cobalt, nickel, and organic solvents. Crushing these batteries can cause a thermal runaway, leading to fire, explosions, and the release of toxic gases and can pose environmental hazards if crushed, stored, or transported improperly.

Inhaling lithium can cause irritation to the nose, throat, and lungs. Higher exposure can lead to pulmonary edema and severe respiratory issues. Leaks from improperly handled battery materials can also contaminate soil and groundwater, potentially harming students and staff.

A conditional use permit may not be detrimental to the "health, safety, and welfare of the public or to the property and residents in the vicinity". The documented risks associated with lithium-ion battery processing make this a difficult finding to support. A battery processing facility is likely to be considered incompatible with the character of a neighborhood that includes a high school. Odors, noise, and the perception of danger can diminish the quality of life and potentially injure nearby properties.

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A processing facility that generates excessive noise, odor, dust, or traffic—or poses a risk of fire or toxic release—could be considered a public nuisance under California common law. If the conditional use permit is approved, this could potentially form the basis for a future lawsuit.

The proposed daily truck deliveries and exports are scheduled during our peak student hours—9:00 a.m. and 11:00 a.m. This directly conflicts with school arrival, dismissal, and class time, creating serious traffic and safety risks for our students. Vehicle emissions from trucks can also degrade local air quality.

The application fails to include a full and proper CEQA (California Environmental Quality Act) environmental review. By law, projects with potential hazardous impacts near schools require a full Environmental Impact Report. Without it, approving this project would violate state law and deny the public its right to transparency and mitigation. CEQA mandates that traffic safety near sensitive receptors be thoroughly analyzed assessing hazards, traffic, air quality, emergency response, and cumulative effects. CEQA requires an Initial Study to identify impacts. If significant risks are identified, an EIR is then required.

Finally, the facility poses a fire safety risk. Lithium battery fires require specialized training and equipment. We have no assurance that our local fire department is adequately prepared, or that the applicant has complied with NFPA 855 safety standards. (Ventilation and Spacing; Signage; Detection Systems; Suppression Systems; Explosion Prevention; Fire Testing.)

For these reasons, we respectfully ask the Department to deny this permit. At a minimum, you must require a full Environmental Impact Report that addresses hazardous materials, traffic safety, fire protection, and the proximity to our school.

Our duty is to protect the safety and well-being of Holtville's students. This lithium battery processing facility belongs far away from schools, not 1,000 feet from our classrooms.

Thank you,

Celso Ruiz, Superintendent

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CUP25-0003 / IS25-0009

APPLICATION

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CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (442) 265-1736

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1. PROPERTY OWNER'S NAME Melon Property Managemnt LLC		EMAIL ADDRESS ben@ohm-inc.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 15333 Culver Dr. 340 #816 Irvine CA		ZIP CODE 92604	PHONE NUMBER 614-828-8839
3. APPLICANT'S NAME Ben Strunk		EMAIL ADDRESS ben@ohm-inc.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 7515 Hill Rd Canal Winchester Ohio		ZIP CODE 43110	PHONE NUMBER 614-593-1987
4. ENGINEER'S NAME The Holt Group	CA. LICENSE NO. 31773	EMAIL ADDRESS Jgalvan@theholtgroup.net	
5. MAILING ADDRESS (Street / P O Box, City, State) 1601 North Imperial Avenue El Centro CA		ZIP CODE 92243	PHONE NUMBER 760-337-5997

6. ASSESSOR'S PARCEL NO. 045-570-088	SIZE OF PROPERTY (in acres or square foot) +/- 21.36 Acres	ZONING (existing) M1U
7. PROPERTY (site) ADDRESS 2255 Melon Rd. (building 4) Holtville CA 92550		
8. GENERAL LOCATION (i.e. city, town, cross street) Situated along Melon Rd. Between Zenos and Alamo Roads.		
9. LEGAL DESCRIPTION See CLTA (attached)		

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	Separate Attachment - Project Description.
11. DESCRIBE CURRENT USE OF PROPERTY	Ag equipment storage, Vacant Space (potential lease), Reverse Logistics.
12. DESCRIBE PROPOSED SEWER SYSTEM	Existing 8" VCP sewer pipeline along Melon Road serviced by Holtville
13. DESCRIBE PROPOSED WATER SYSTEM	Existing Domestic line serviced by Holtville
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	Secondary plans proposed system to be fed by new waterline

15. IS PROPOSED USE A BUSINESS? ☒ Yes ☐ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? 4 (new business) 6 existing.

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT.

Ben Strunk — Print Name — 3/4/2025 — Date

Signature

Print Name — Date

Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE
C. OTHER
D. OTHER

APPLICATION RECEIVED BY:		DATE		REVIEW / APPROVAL BY OTHER DEPT'S required.
APPLICATION DEEMED COMPLETE BY:		DATE		☐ P. W.
APPLICATION REJECTED BY:		DATE		☐ E. H. S.
TENTATIVE HEARING BY:		DATE		☐ A. P. C. D.
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE		☐ O. E. S.
				☐
				☐

CUP # 25-0003
ISA25-0009

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Conditional Use Permit Application

Attachment

OMEGA HARVESTED METALLURGICAL

Battery Recycling Facility

2255 Melon Road
Building 4
Holtville, CA 92250
APN 045-570-088

Project Description:

OHM is proposing to use an existing 8,000 square foot facility at 2255 Melon Road in an unincorporated area adjacent to the city of Holtville as a battery recycling facility. The 21.36-acre parcel is currently built up with 7 building structures of varying sizes.

It is important to note that battery recycling involves various processes, and this site will only be used to crush inert, inactive batteries. These inert, inactive batteries have had the electricity discharged in a facility in LA County and then delivered to the Holtville site via truck cargo Mondays through Friday. A maximum of two trucks per day will be delivered to the site and up to two trucks will be transporting the crushed materials from the site to San Diego for export to Japan.

Discharged batteries are received from the LA County facility and occasionally directly from automotive original equipment manufacturers (OEM's). The waste code of batteries is D003. OHM's LA County facility (or the OEM) will perform a complete electrical, resistance discharge on the batteries using customized, purpose-built equipment prior to being transported in accordance with 49CFR Part 397, following all packaging and handling requirements to prevent release of hazardous contaminants to the environment. Batteries are discharged to 0v prior to transport. Sand and Class D extinguisher material will be on hand in sufficient quantity at the project site to stop and eliminate any potential fire, and to

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prevent the spread thereof. The amount of material on site any given day will be limited to what can be processed in that day. This is so as not to stockpile batteries to minimize the risk of thermal runaway. OHM's extensive experience with multiple different types/grades of Lithium batteries has provided us with what we consider the best methods to prevent thermal runoff and any other potential risks in having batteries of any quantity on hand.

Batteries will be crushed by an industrial crusher located inside the 8,000 square foot facility. The crusher occupies an area of approximately 550 square feet. OHM employees will utilize volt meters to verify that all batteries received at the project site are completely discharged to 0v. If there are any batteries found that not completely discharged, they will removed through a quarantine process and returned to their source for additional processing. Once batteries are confirmed as being discharged and inert, the batteries will be crushed into 1.5-3" chunks. Crushed materials are then placed onto metal drums which will then be transported to San Diego for shipping. The crushing system is designed as a closed system, complete with VOC/air quality monitoring and purifying equipment. Employees will be utilizing personal protective equipment as required.

Final design and implementation will be documented after the CUP is approved. A Spill and Emergency Response Plan which describes all safety and environmental measures and contingency plans for spill or leak events will be prepared prior to the commencement of operations. Water is not used in crushing the batteries nor are there and hazardous materials involved in the entire process and therefore, contamination of stormwater is not expected.

The entire process is mechanical in nature, and does not require water, fire, or chemicals to complete. The entire process does not result in electrolyte or solvent residues as no solvents are used and electrolytes have been discharged. The electrolyte in Lithium batteries is not the same as the electrolyte in Lead acid batteries. The electrolyte evaporates into our VOC system extremely fast, and is treated/eliminated. The process takes approximately 24 hours from the time the batteries are received on site until the time they leave the site. Crushed batteries are not stored on site for longer than 48 hours. Business operating hours are Monday through Friday, 8:00AM to 5:00PM.

OHM's goal is for zero waste and all items received are to be recycled. There are no waste streams (hazardous or otherwise) generated during the battery crushing process. OHM's recycling process is to capture all heavy metal materials from the discharged batteries. There is no waste characterization data as there is no waste to be disposed of. Regardless,

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the project will comply with all requirements of the Resource Conservation and Recovery Act (RCRA).

Noise levels are consistent with other light industrial uses with noise from the battery crusher not exceeding 60dBA. The battery recycling facility is 1,300 feet from the closest classroom at Holtville High School and 700 feet from the nearest residence on Zenos Road. The battery crusher is located within an enclosed building, and as such, noise generated by the project will not be audible to sensitive receptors.

A total of 4 employees will be working at the site at any given time.

OHM will comply with all Federal, State, and local laws with regards to operation and transport. Once the Conditional Use Permit is approved, OHM will obtain all necessary regulatory permits prior to its operation in Imperial County.

Existing Uses Within the Project Site:

The main 56,687 square-foot building within the project site is currently being utilized as a reverse logistics facility where old, palletized equipment is stored and sorted for transport to other processing facilities. The process is similar to materials recycling facilities that is permitted by right within the M-1 zone. A maximum of two truck loads of materials are currently being delivered to the site. A total of 6 employees will be working at the site at any given time.

A 6,344 building in the northeast corner of the property is currently being utilized for agricultural equipment storage. This existing use is also allowed by right within the M-1 zone.

There are two other buildings on the site: 3,900 square feet and 8,468 square feet. Both buildings are currently vacant but are made available for lease. There is also a 21,717 square foot shade structure that will be used for storage for the reverse logistics business. Lastly, there is a 1,221 square foot office building that will be utilized for office space.

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Water and Wastewater

Domestic water is provided to the site via an existing water pipeline from the City of Holtville. A 12" PVC pipeline is being proposed to serve the fire protection demand of the project site which will connect from existing 6" ACP pipeline on Melon and 8th Street and looping to another existing pipeline approximately 660' south. A fire sprinkler system will be installed within the proposed battery recycling facility.

The project site is currently connected to an existing 8" VCP sewer pipeline along Melon Road serviced by the City of Holtville.

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Luis Bejarano

From: Jeorge Galvan, AICP <jgalvan@theholtgroup.net>
Sent: Thursday, April 3, 2025 9:03 AM
To: Luis Bejarano; ben@ohm-inc.com
Cc: Diana Robinson; Michael Abraham; Gerardo Quero
Subject: RE: CUP25-0003 / IS25-0009 - OMEGA HARVEST METALLURGICAL
Attachments: 1339.001 OHM 4.01.25_Site Plan.pdf; 1399.001_4.03.25_Schematic Floor Plan.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated outside our organization; please use caution.

Good Morning Luis and Gerardo,

Please see our response below in in **bold, red text.** Additionally, refer to the attached revised Site Plan and new Schematic Site Plan. Let us know if you have any questions or need additional information.

Jeorge Galvan, AICP
Principal Planner/Project Manager

The Holt Group, Inc.
Engineering and Planning

1601 North Imperial Avenue
El Centro, CA 92243

P: 760.337.3883
F: 760.337.5997

www.theholtgroup.net

From: Luis Bejarano <luisbejarano@co.imperial.ca.us>
Sent: Thursday, March 20, 2025 5:03 PM
To: ben@ohm-inc.com; Jeorge Galvan, AICP <jgalvan@theholtgroup.net>
Cc: Diana Robinson <DianaRobinson@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Gerardo Quero <gerardoquero@co.imperial.ca.us>
Subject: CUP25-0003 / IS25-0009 - OMEGA HARVEST METALLURGICAL

Good afternoon Mr. Strunk,

Gerardo and I have been assigned as the planners for your project (CUP25-0003 / IS25-0009). In order to proceed with the review process, the following additional items will be required, in addition to the originally submitted package (submitted on March 6, 2025), to deem the application complete. According to CEQA guidelines (Section 15101), we have until April 4, 2025, which is 30 days from the date of submittal, to determine whether the application is complete or incomplete. If, for any reason, you are unable to provide the requested additional information by this deadline, we will be required to deem the application incomplete. However, you may resubmit the application once all required items are prepared for submission.

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Additional Information for a Detailed and Comprehensive Project Description and Processing Cycles:

- **Specify the types of batteries** that will be handled by the proposed project (e.g., Lithium, Alkaline, Nickel-Cadmium, etc.). - **Lithium Batteries.**
- **Provide details on the quantities** of batteries and identify any materials or chemicals that may be generated as waste or a byproduct of the crushing process. Additionally, outline how this waste will be managed and disposed of. - **The maximum production expected is 1 truckload per day. (40,000 lbs maximum) The only material produced will be crushed battery materials. (Iron, Aluminum, plastic, Copper, Cobalt primarily.) These materials are collected in drums and shipped to a smelter in Japan for final recovery.**
- **Indicate the expected volume** of batteries to be received at the facility on a daily, weekly, or monthly basis. - **Maximum of 40,000 lbs daily, more likely to be no more than 120,000 lbs weekly.**
- **Specify the transportation routes** from Los Angeles to Holtville, as well as from Holtville to San Diego, to ensure proper logistics planning. **From LA County, trucks will utilize the 10 Freeway to the 86 to 115 into Holtville and then Alamo Road to Melon Road. Alternatively, trucks may travel from LA County to San Diego via the 8 Freeway onto the 111 to Evan Hewes Highway to Alamo road. From Holtville to San Diego, trucks will utilize Alamo Road to get onto Highway 115 to Evan Hewes Road and then onto Highway 111 to the 8 Freeway.**
- **Clarify the hours of operation** for the facility, including both regular working hours and any potential extended hours. **Hours of operation will be from 8:00AM to 5:00PM, Monday through Friday. On rare occasions, the facility may operate on Saturdays from 8:00AM to 5:00PM.**
- **Provide information on Delivery and Exportation hours**, detailing the specific times during which goods will be received and shipped from the facility. **Materials will not be received in Holtville until 11:00AM at the earliest as the batteries need to be loaded in LA County and will take approximately 4 hours before it arrives in Holtville. Once the batteries are crushes and loaded onto drums, trucks will leave Holtville at approximately 9:00AM to head on to San Diego. Truck delivery and exportation will not occur outside of normal business hours.**
- **Any additional information about the project's processing phases and cycles. As inert batteries are delivered to the site in Holtville, the inert batteries will directly place onto the battery crusher using a forklift. Crushed materials will then be placed onto steel drums. Once all batteries are crushed, the steel drums will then be loaded onto a truck for export in San Diego. The process then starts all over again.**

Equipment:

- **Provide comprehensive details** on all equipment involved, including ventilation systems, industrial crushers, spill containment systems, and any other ancillary equipment. Please include technical specifications, model numbers, manufacturer information, and any other relevant details regarding the implementation and operation of these systems. - **The primary equipment on site is an HRD50 industrial crusher within an enclosure. The crusher operates with 2 electric motors driving the crushing "teeth" that operate in 2 rows together to pull material through into the negative airflow compartment, where material is collected into drums. A VOC System with a powerful blower is attached to the crusher, to pull the air from the crushing chamber through the active carbon filtration and UV lamp to purify the air.**

Noise:

- **Specify the expected noise levels (in dBA)** at the nearest residential areas and the school, based on the distances outlined in your project description. Additionally, clarify whether the 60 dBA noise level is confined solely to the interior of the building or if it extends beyond. **The crusher will be located entirely within the building. The 60dBA specified in the Project Description is**

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measured at the source, inside the building. Assuming minimal attenuation by the building enclosure, noise from the battery is expected to be approximately 13.1dBA at the exterior of the nearest residential structure. At this low level, noise from the crusher will not be heard over ambient road noise from Zenos Road and other industrial uses in the area.

Floor Plan:

- **Provide a detailed floor plan** with dimensions, clearly indicating designated areas such as storage, office spaces, equipment zones, containment areas, and any other relevant sections that will help illustrate the handling process from the reception of batteries to the export of the crushed material. **See attached.**
- **Clearly mark exit routes and entrances** within the building on the floor plan to ensure compliance with safety regulations. **See attached.**

Site Plan:

- **Indicate the number of parking spaces** allocated for employees and general operations in the site plan. Please specify whether the parking spaces will be shared with another facility or business on the property. **See attached floor plan. Parking spaces noted on the site plan will only be utilized by Omega Harvested Metallurgical (OHM).**
- **Provide the setbacks from property lines** to ensure compliance with zoning and building regulations. **The project is located within the M-1 zone. The front yard setback is 10 feet from the property line. There are no side or rear yard setback requirements. No new building structures are proposed. The previously submitted Site Plan does indicate distances of existing building to the front property lines, however, the Site Plan has been revised to include additional dimensions. Please see attached revised Site Plan.**
- **Specify whether retention basins are being proposed**, or if there is an existing stormwater management system in place to address drainage needs. **No new building structures or impervious areas are proposed for the site. Runoff sheet flows from the site onto the existing drainage system on Melon.**
- **Label and identify all existing structures** and their corresponding businesses on the site plan to provide a clear understanding of the current layout. **All buildings on the project site have been labeled on the previously submitted Site Plan. Two buildings are currently vacant (as noted on the Site Plan) but will be available for lease space.**

Existing Uses:

- **Clarify and expand upon the current operations** on-site, specifically related to Reverse Logistics. What types of equipment are being palletized, sorted, and exported? Is the equipment being processed or dismantled in any way? Additionally, please specify under which enlisted use the existing business is operating on-site, referencing Title 9, Division 5, Chapter 15, §90515.01. **Reverse logistics fits under subsection (hhh) as Electrical Appliance sales, repair and distribution. Household electronic equipment such as old VCR's, computers, power tools, and similar equipment are being palletized, sorted, and exported. These equipment are not being dismantled or otherwise processed.**

Owner's Affidavit:

- An **owner's affidavit** will need to be submitted by the landowner to the individual signing the application forms (Ben Strunk), or, if applicable, proof of ownership should be provided. **Sent via separate email. Original wet-signed copies are being mailed to ICDPS, Attention Luis Bejarano.**

General Indemnification Agreement:

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- An **original copy** of the General Indemnification Agreement, complete with wet signatures, must be submitted to our department in order for us to proceed with processing the application. While you have provided a General Indemnification Agreement, it was missing the required signatures. **Sent via separate email. Original wet-signed copies are being mailed to ICDPS, Attention Luis Bejarano.**

Emergency Action Plan:

- Would you propose an Emergency Action Plan? Please be advised that this is something that is not being required at this point, but the Imperial County Fire Department might require an Emergency Action Plan for your proposed project. An emergency action plan (EAP) is a comprehensive document outlining procedures and guidelines for ensuring safety and well-being during emergencies in a workplace or community space, providing clear instructions and protocols for various scenarios.

Some of the Key Elements in an EAP are:

- Facility overview (location and emergency contacts), Risk Assessment and Emergency Identification (Potential Hazards), Emergency Procedures (Evacuation Plan, Evacuation Routes, Muster Points, Post-Evacuation Personnel Accounting Steps, Fire response, Chemical Spill/Release, Medical Emergencies), Communication and Coordination, Training and Drills, Personal Protective Equipment (PPE) and Equipment Maintenance, Post-Incident Review, Recordkeeping, etc.

Prior to operation, an EAP, and full closure plan complete with financial instrument is required. Prior to completing the EAP, and closure plan, the waterline, sprinkler and equipment installation will be completed. (the EAP has specific requirements that will need the work to be finalized first.) But yes, an EAP will be created prior to operation.

Should you have any questions or need further clarification regarding the items mentioned, please don't hesitate to reach out. I am available to discuss any of these requirements in more detail if needed. Regards and thanks in advance.

Luis Bejarano
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Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243
luisbejarano@co.imperial.ca.us
Phone (442) 265-1736

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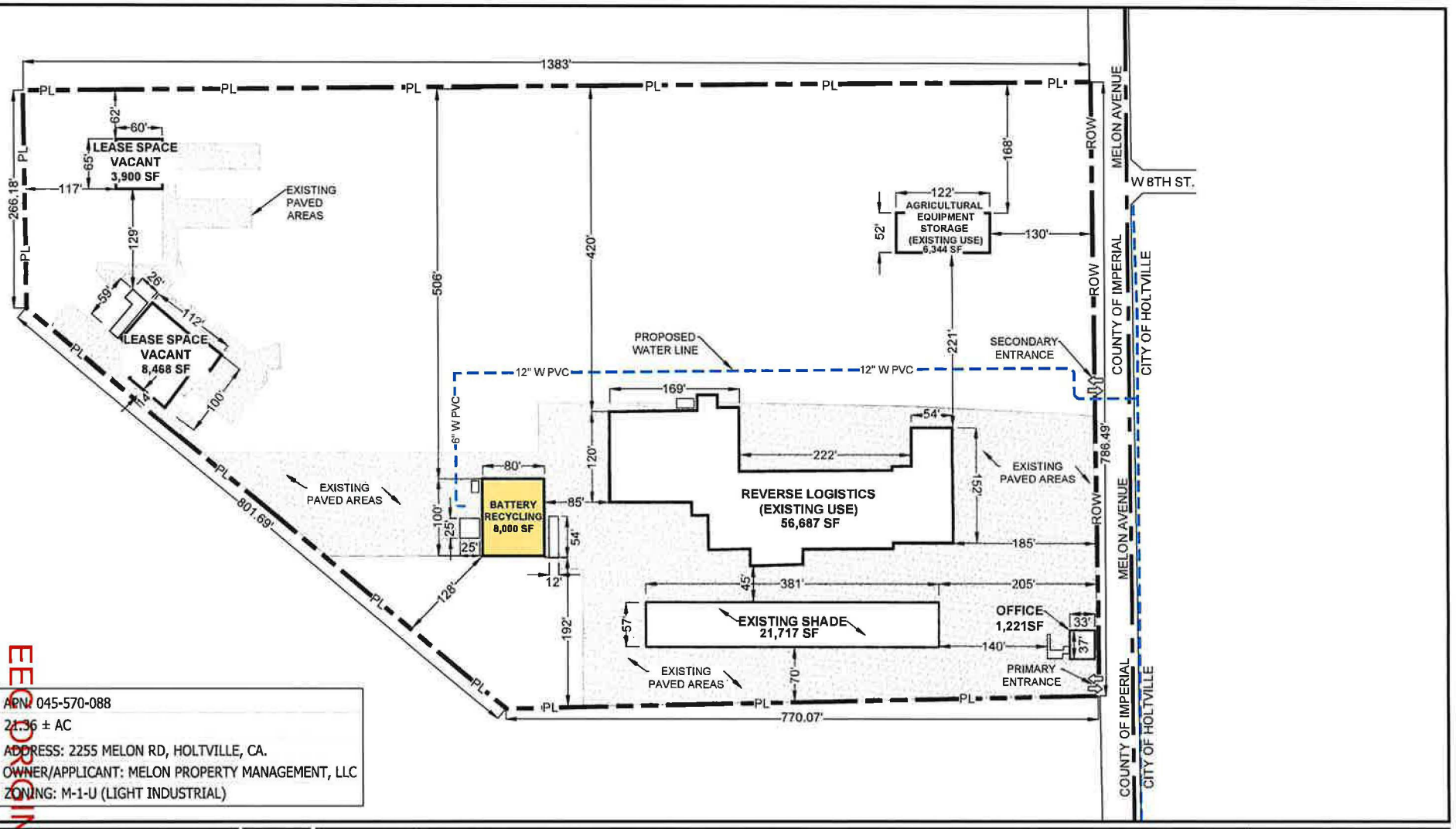

APN: 045-570-088
24.36 ± AC
ADDRESS: 2255 MELON RD, HOLTVILLE, CA.
OWNER/APPLICANT: MELON PROPERTY MANAGEMENT, LLC
ZONING: M-1-U (LIGHT INDUSTRIAL)

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The Holt Group
ENGINEERING PLANNING SURVEYING
201 E. Hobsonway Blythe, Ca 92225
1601 N. Imperial Ave. El Centro, Ca 92243
760.922.4658
760.337.3883

SCALE 1" = 120'

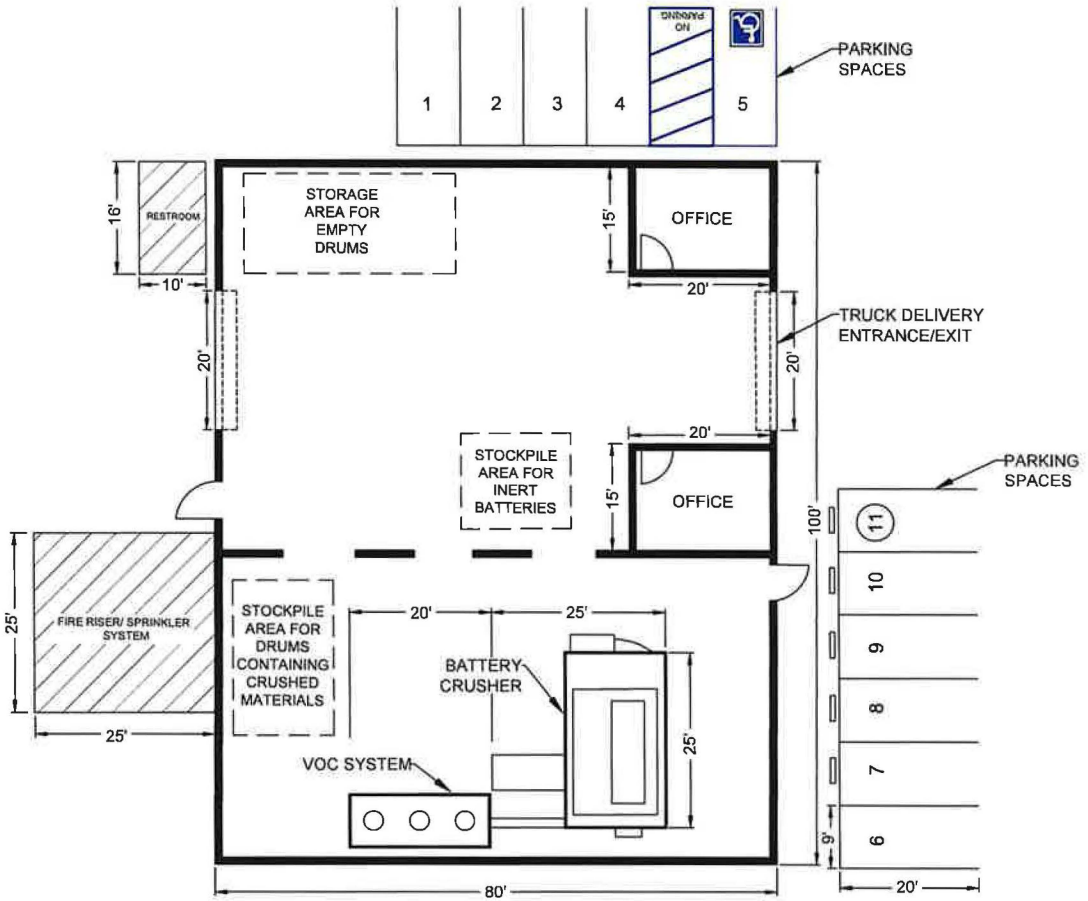
OHM BATTERY RECYCLING FACILITY

CONDITIONAL USE PERMIT APPLICATION

HOLTVILLE, CA

SITE PLAN

DATE: 4/01/2025
JOB NUMBER: 1339.001



Note: All dimensions are approximate.All structures are existing.
Final dimensions of equipment and exact location will be determined at time of building permit, if required.

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NOT TO SCALE

OHM BATTERY RECYCLING FACILITY

CONDITIONAL USE PERMIT APPLICATION

HOLTVILLE, CA

SCHEMATIC FLOOR PLAN

DATE: 4/03/2025

JOB NUMBER: 1339.001