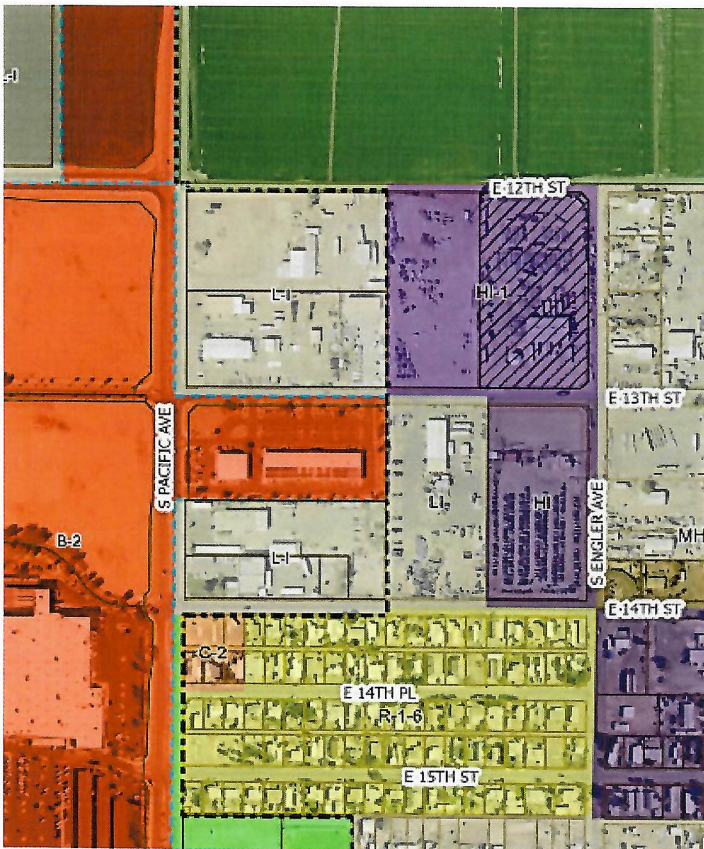


Last September, A.A. Sydcol, a non-hazardous waste transfer operator, sought a Special Use Permit (SUP) from Yuma County to process hazardous materials at 2264 13<sup>th</sup> Street in Yuma County, 280 feet from the City municipal boundary. (See attached Memo from September 21, 2022). The hearing never materialized

and now, six months later, a public hearing on the SUP is scheduled in front of the Yuma County Planning and Zoning Commission. After the Planning and Zoning Commission hearing and recommendation to either approve or deny the SUP, unless the applicant withdraws the application, the SUP will go to the Yuma County Board of Supervisors for final approval or denial. If approved, the permit would allow the handling and storage of hazardous waste on the site.



The Yuma County Planning and Zoning Commission public hearing was held on April 25, 2023 at the Aldrich Auditorium, 2351 West 26<sup>th</sup> Street, at 5:00 p.m. and the commissioners with a 6-2 vote approved the SUP. The audience consisted of City experts, public safety personnel from the City, Rural Metro and MCAS all testifying against this location for a hazardous waste transfer station. The SUP request will now be heard by the Board of Supervisors for final approval or denial on June 5, 2023. This will be the last chance to kill the SUP. Please attend this meeting at 198 Main St. 9am on June 5th to voice your opposition.

The adjacent map depicts the site as the hatch marked location just east of Yuma Palms Mall and Pacific Avenue (Sam's Club is shown in the lower left corner, the City of Yuma municipal boundary is shown in dashed black line, and a Yuma County low density (R-1-6) residential zone is shown in yellow).

The draft hazardous waste permit can be found at <https://www.azdeq.gov/node/8904>.

According to the narrative submitted to Yuma County, ADEQ has already issued the required state permit.

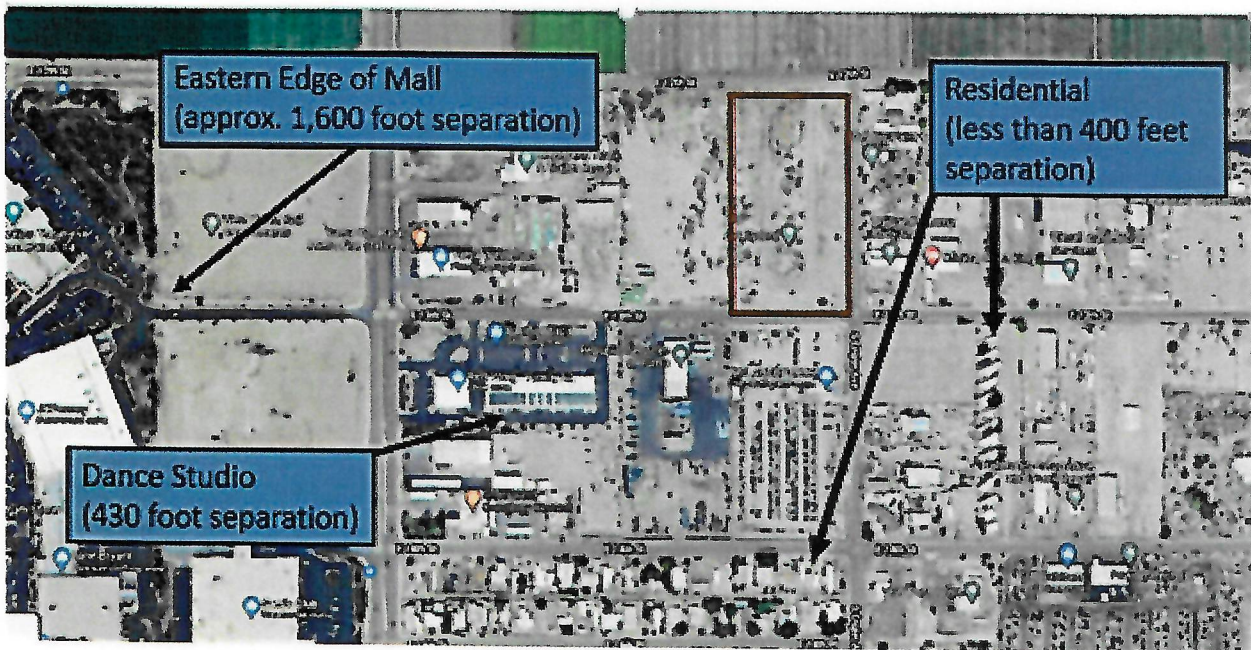
“The Arizona Department of Environmental Quality (“ADEQ”) and Region IX of the US Environmental Protection Agency (“EPA”) have approved the Facility to include the handling and storage of hazardous waste with the issuance of a Final Permit-Arizona Hazardous Waste Management Act Permit effective September 12, 2022 (the “ADEQ Permit”).

In addition to concerns in the September 21, 2022 Memo, the following observations are a few of the many issues identified with this inappropriate site:

- The site abuts active farm fields and irrigation. It is unknown (but likely) these fields have agricultural leases and produce food for human consumption. Whether the lessee farmers received notice of the application for the ADEQ Hazardous Materials permit or the March 28, 2023 public hearing for the Yuma County SUP raises a concern that can never be mitigated at this location.
- A clear federal requirement under 40 CFR § 264.37 is that “where more than one police and fire department might respond to an emergency,” “the owner or operator must attempt to make arrangements, as appropriate for the type of waste handled at his facility.” This federal requirement includes “agreements designating primary emergency authority to a specific police and a specific fire department.” This never happened. Neither the City of Yuma Fire Department or the City of Yuma Police Department were ever notified, consulted, or contacted by the applicant for the ADEQ Hazardous Materials permit. There is no known emergency plan.
- Because the City of Yuma Fire Marshal has never been contacted concerning the proposed hazardous waste processing (except by Yuma County for the SUP), the Fire Marshall has been prevented by the applicant from making appropriate inquiries or obtaining answers as to the exact type and expected quantity of hazardous materials that will be processed at the site. What can be gleaned from the ADEQ Fact Sheet (attached) is the site will have the capacity to store 228,260 gallons of hazardous waste. Typical wastes will include flammable items, oxidizers, and materials that may undergo rapid chemical reaction. Think substances that easily go boom and support spontaneous combustion at different flashpoints stored outside in Yuma’s climate.
- The City of Yuma hazardous materials route closest to the site runs from Avenue 3E to Highway 95 east. Hazardous materials routes are designated to have the least impact on public health and safety in the event of a spill or release. Hazardous material processing facilities need to be located in an appropriate location along such hazardous materials routes, and far away from centers of commerce such as the Yuma Palms Regional Center, farmlands, and residential areas (of which there are two). Within a quarter mile from the proposed site are a children’s dance studio, an oncology center, a 3,032 person 14-plex movie theater (1,349 feet on the same street), 100 single family

residential units (682 feet away) and a 14 unit mobile home park (on the same street, 378 feet away). From a health and safety perspective, the only worse location for a hazardous materials processing center in Yuma would be next to the hospital or the military base and even that is debatable.

If this location is acceptable to Yuma County – which the City of Yuma does not for an instant believe Yuma County leadership would ever approve – of gravest concern to the City of Yuma is the lack of water service to the property, inadequate fire flows, the lack of a fire engineer’s stamped plans that have been shared with the City, and a complete disregard of emergency response planning and coordination on the part of the applicant.



**Table 1**  
**AA Sydco Hazardous Wastes**

Waste type	RCRA Waste Codes	HMWUs	Estimated Annual Quantity (tons)
Ignitables	D001	1*, 2, 3, 4	30,000
Corrosives	D002	1*, 2, 3, 4	20,000
Reactives	D003	1*, 2, 3, 4	200
Toxicity: Heavy metals	D004-011	1*, 2, 3, 4	100
Toxicity: pesticides/herbicides	D012-017, 020, 031	1*, 2, 3, 4	100
Toxicity: Volatile organics	D018-019, 021-022, 028-029, 035, 039-040, 043	1*, 2, 3, 4	32,500
Toxicity: Semi-volatile organics	D022-027, 032-034, 036-038, 041-042,	1*, 2, 3, 4	200
2,4 dinitrotoluene, nitrobenzene	D030, D036	1*, 2, 3, 4	2
Halogenated compounds: degreasing	F001	1*, 2, 3, 4	4,000
Halogenated compounds: solvents	F002	1*, 2, 3, 4	4,000
non-Halogenated compounds: solvents	F003-005	1*, 2, 3, 4	8,000
Listed electroplating wastes	F006-009	1*, 2, 3, 4	11,000
Listed metal finishing wastes	F010-012, 019	1*, 2, 3, 4	2,500
Chlorinated aliphatic hydrocarbons	F024-026	1*, 2, 3, 4	10
Listed wood preserving wastes	F032, F034-035	1*, 2, 3, 4	10
Refinery WW treatment sludges	F037-038	1*, 2, 3, 4	10
Hazardous leachates	F039	1*, 2, 3, 4	10
P-listed commercial chemicals	P001-P205	1*, 2, 3, 4	100
Commercial grade acetone	U007	1*, 2, 3, 4	100
Commercial grade benzene	U019	1*, 2, 3, 4	100
Commercial grade 1-butanol	U031	1*, 2, 3, 4	20
Commercial grade methanol	U154	1*, 2, 3, 4	100
Commercial grade methyl ethyl ketone	U159	1*, 2, 3, 4	100
other U-listed commercial chemicals	U001, 003-018, 020-030, 032-153, 154-158, 160-411	1*, 2, 3, 4	200
<b>Total</b>			<b>113,362</b>

\* Containers with free liquids or listed waste F026 are to be placed on containment pallets or within non-occupancy structures in HWMU1.

Category	Code	Description
P-LIST " ACUTELY HAZARDOUS WAST	P009	AMMONIUM PICRATE (R) (OR) PHENOL, 2,4,6-TRINITRO-, AMMONIUM SALT (R)
P-LIST " ACUTELY HAZARDOUS WAST	P010	ARSENIC ACID H3ASO4
P-LIST " ACUTELY HAZARDOUS WAST	P011	ARSENIC OXIDE AS2O5 (OR) ARSENIC PENTOXIDE
P-LIST " ACUTELY HAZARDOUS WAST	P012	ARSENIC OXIDE AS2O3 (OR) ARSENIC TRIOXIDE
P-LIST " ACUTELY HAZARDOUS WAST	P013	BARIUM CYANIDE
P-LIST " ACUTELY HAZARDOUS WAST	P014	BENZENETHIOL (OR) THIOPHENOL
P-LIST " ACUTELY HAZARDOUS WAST	P015	BERYLLIUM
P-LIST " ACUTELY HAZARDOUS WAST	P016	DICHLOROMETHYL ETHER (OR) METHANE, OXYBIS[CHLORO-
P-LIST " ACUTELY HAZARDOUS WAST	P017	2-PROPANONE, 1-BROMO-, (OR) BROMOACETONE
P-LIST " ACUTELY HAZARDOUS WAST	P018	BRUCINE (OR) STRYCHNIDIN-10-ONE, 2,3-DIMETHOXY-
P-LIST " ACUTELY HAZARDOUS WAST	P020	DINOSER (OR) PHENOL, 2-(1-METHYLPROPYL)-4,6-DINITRO-
P-LIST " ACUTELY HAZARDOUS WAST	P021	CALCIUM CYANIDE (OR) CALCIUM CYANIDE CA(CN)2
P-LIST " ACUTELY HAZARDOUS WAST	P022	CARBON DISULFIDE
P-LIST " ACUTELY HAZARDOUS WAST	P023	ACETALDEHYDE, CHLORO-, (OR) CHLOROACETALDEHYDE
P-LIST " ACUTELY HAZARDOUS WAST	P024	BENZENAMINE, 4-CHLORO-, (OR) P-CHLORANILINE
P-LIST " ACUTELY HAZARDOUS WAST	P026	1-(O-CHLOROPHENYL)THIOUREA (OR) THIOUREA, (2-CHLOROPHENYL)-
P-LIST " ACUTELY HAZARDOUS WAST	P027	3-CHLOROPROPIONTRILE (OR) PROPANENITRILE, 3-CHLORO-
P-LIST " ACUTELY HAZARDOUS WAST	P028	BENZENE, (CHLOROMETHYL)-, (OR) BENZYL CHLORIDE
P-LIST " ACUTELY HAZARDOUS WAST	P029	COPPER CYANIDE (OR) COPPER CYANIDE CU(CN)
P-LIST " ACUTELY HAZARDOUS WAST	P030	CYANIDES (SOLUBLE CYANIDE SALTS), NOT OTHERWISE SPECIFIED
P-LIST " ACUTELY HAZARDOUS WAST	P031	CYANOGEN (OR) ETHANEDINITRILE
P-LIST " ACUTELY HAZARDOUS WAST	P033	CYANOGEN CHLORIDE (OR) CYANOGEN CHLORIDE (CN)CL
P-LIST " ACUTELY HAZARDOUS WAST	P034	2-CYCLOHEXYL-4,6-DINITROPHENOL (OR) PHENOL, 2-CYCLOHEXYL-4,6-DINITRO-
P-LIST " ACUTELY HAZARDOUS WAST	P036	ARSONOUS DICHLORIDE, PHENYL-, (OR) DICHLOROPHENYLARSINE
P-LIST " ACUTELY HAZARDOUS WAST	P037	2,7,3,6-DIMETHANONAPHTH[2,3-B]OXIRENE, 3,4,5,6,9,9-HEXACHLORO-; 1A,2,2A,3,6,6A,7,7A-OCTAHYDRO-, (1AALPHA, 2BETA, 2AALPHA, 3BETA, 6BETA, 6AALPHA, 7BETA, 7AALPHA)- (OR) DIELDRIN
P-LIST " ACUTELY HAZARDOUS WAST	P038	ARSINE, DIETHYL-, (OR) DIETHYLARSINE
P-LIST " ACUTELY HAZARDOUS WAST	P039	DISULFOTON (OR) PHOSPHORODITHIOIC ACID, O,O-DIETHYL S-[2-(ETHYLTHIO)ETHYL] ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P040	O,O-DIETHYL O-PYRAZINYL PHOSPHOROTHIOATE (OR) PHOSPHOROTHIOIC ACID, O,O-DIETHYL O-PYRAZINYL ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P041	DIETHYL-P-NITROPHENYL PHOSPHATE (OR) PHOSPHORIC ACID, DIETHYL 4-NITROPHENYL ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P042	1,2-BENZENEDIOL, 4-[1-HYDROXY-2-(METHYLAMINO)ETHYL]-, (R)- (OR) EPINEPHRINE
P-LIST " ACUTELY HAZARDOUS WAST	P043	DIISOPROPYLFLUOROPHOSPHATE (DFP) (OR) PHOSPHOROFLUORIDIC ACID, BIS(1-METHYLETHYL) ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P044	DIMETHOATE (OR) PHOSPHORODITHIOIC ACID, O,O-DIMETHYL S-[2-(METHYLAMINO)-2-OXOETHYL] ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P045	2-BUTANONE, 3,3-DIMETHYL-1-(METHYLTHIO)-, O-[METHYLAMINO]CARBONYL] OXIME (OR) THIOFANOX
P-LIST " ACUTELY HAZARDOUS WAST	P046	ALPHA,ALPHA-DIMETHYLPHENETHYLAMINE (OR) BENZENEEETHANAMINE, ALPHA, ALPHA-DIMETHYL-
P-LIST " ACUTELY HAZARDOUS WAST	P047	4,6-DINITRO-O-CRESOL, & SALTS (OR) PHENOL, 2-METHYL-4,6-DINITRO-, & SALTS
P-LIST " ACUTELY HAZARDOUS WAST	P048	2,4-DINITROPHENOL (OR) PHENOL, 2,4-DINITRO-
P-LIST " ACUTELY HAZARDOUS WAST	P049	DITHIOBIURET (OR) THIOIMIDODICARBONIC DIAMIDE [(H2N)C(S)]2NH

Category	Code	Description
P-LIST " ACUTELY HAZARDOUS WAST	P050	6,9-METHANO-2,4,3-BENZODIOXATHIEPIN,6,7,8,9,10,10-HEXACHLORO-1,5,5A,6,9,9A-HEXAHYDRO-3-OXIDE (OR) ENDOSULFAN
P-LIST " ACUTELY HAZARDOUS WAST	P051	2,7,3,6-DIMETHANONAPHTH[2,3-B]OXIRENE, 3,4,5,6,9,9-HEXACHLORO-1A,2,2A,3,6,6A,7,7A-OCTAHYDRO-, (1AALPHA, 2BETA, 2ABETA, 3ALPHA, 6ALPHA, 6ABETA, 7BETA, 7AALPHA)- & METABOLITES (OR) ENDRIN, & METABOLITES
P-LIST " ACUTELY HAZARDOUS WAST	P054	AZIRIDINE (OR) ETHYLENEIMINE
P-LIST " ACUTELY HAZARDOUS WAST	P056	FLUORINE
P-LIST " ACUTELY HAZARDOUS WAST	P057	ACETAMIDE, 2-FLURO- (OR) FLUROACETAMIDE
P-LIST " ACUTELY HAZARDOUS WAST	P058	ACETIC ACID, FLURO-, SODIUM SALT (OR) FLUROACETIC ACID, SODIUM SALT
P-LIST " ACUTELY HAZARDOUS WAST	P059	4,7-METHANO-1H-INDENE, 1,4,5,6,7,8,8-HEPTACHLORO-3A,4,7,7A-TETRAHYDRO- (OR) HEPTACHLOR
P-LIST " ACUTELY HAZARDOUS WAST	P060	1,4,5,8-DIMETHANONAPHTHALENE, 1,2,3,4,10,10-HEXA-CHLORO-1,4,4A,5,8,8A-HEXAHYDRO-, (1ALPHA, 4ALPHA, 4ABETA, 5BETA, 8BETA, 8ABETA)- (OR) ISODRIN
P-LIST " ACUTELY HAZARDOUS WAST	P062	HEXAETHYL TETRAPHOSPHATE (OR) TETRAPHOSPHORIC ACID, HEXAETHYL ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P063	HYDROCYANIC ACID (OR) HYDROGEN CYANIDE
P-LIST " ACUTELY HAZARDOUS WAST	P064	METHANE, ISOCYANATO- (OR) METHYL ISOCYANATE
P-LIST " ACUTELY HAZARDOUS WAST	P065	FULMINIC ACID, MERCURY(2+) SALT (R,T) (OR) MERCURY FULMINATE (R,T)
P-LIST " ACUTELY HAZARDOUS WAST	P066	ETHANIMIDOTHIOIC ACID, N-[(METHYLAMINO)CARBONYL]OXY-, METHYL ESTER (OR) METHOMYL
P-LIST " ACUTELY HAZARDOUS WAST	P067	1,2-PROPYLENEIMINE (OR) AZIRIDINE, 2-METHYL-1,2-PROPYLENEIMINE (OR) AZIRIDINE, 2-METHYL-HYDRAZINE, METHYL- (OR) METHYL HYDRAZINE
P-LIST " ACUTELY HAZARDOUS WAST	P068	2-METHYLLACTONITRILE (OR) PROPANENITRILE, 2-HYDROXY-2-METHYL-ALDICARB (OR) PROPANAL, 2-METHYL-2-(METHYLTHIO)-, O-[(METHYLAMINO)CARBONYL]OXIME
P-LIST " ACUTELY HAZARDOUS WAST	P070	METHYL PARATHION (OR) PHOSPHOROTHIOIC ACID, O,O-DIMETHYL O-(4-NITROPHENYL) ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P072	ALPHA-NAPHTHYLTHIOUREA (OR) THIOUREA, 1-NAPHTHALENYL-
P-LIST " ACUTELY HAZARDOUS WAST	P073	NICKEL CARBONYL (OR) NICKEL CARBONYL NIC(O)4, (T-4)-
P-LIST " ACUTELY HAZARDOUS WAST	P074	NICKEL CYANIDE (OR) NICKEL CYANIDE NIC(N)2
P-LIST " ACUTELY HAZARDOUS WAST	P075	NICOTINE, & SALTS (OR) PYRIDINE, 3-(1-METHYL-2-PYRROLIDINYL)-,(S)- & SALTS
P-LIST " ACUTELY HAZARDOUS WAST	P076	NITRIC OXIDE (OR) NITROGEN OXIDE NO
P-LIST " ACUTELY HAZARDOUS WAST	P077	BENZENAMINE, 4-NITRO- (OR) P-NITROANILINE
P-LIST " ACUTELY HAZARDOUS WAST	P078	NITROGEN DIOXIDE (OR) NITROGEN OXIDE NO2
P-LIST " ACUTELY HAZARDOUS WAST	P081	1,2,3-PROPANETRIOL, TRINITRATE (R) (OR) NITROGLYCERINE (R)
P-LIST " ACUTELY HAZARDOUS WAST	P082	METHANIMINE, N-METHYL-N-NITROSO- (OR) N-NITROSODIMETHYLAMINE
P-LIST " ACUTELY HAZARDOUS WAST	P084	N-NITROSOMETHYL VINYLAMINE (OR) VINYLAMINE, N-METHYL-N-NITROSO-
P-LIST " ACUTELY HAZARDOUS WAST	P085	DIPHOSPHORAMIDE, OCTAMETHYL- (OR) OCTAMETHYLPYROPHOSPHORAMIDE
P-LIST " ACUTELY HAZARDOUS WAST	P087	OSMIUM OXIDE OSO4, (T-4)- (OR) OSMIUM TETROXIDE
P-LIST " ACUTELY HAZARDOUS WAST	P088	7-OXABICYCLO[2,2,1]HEPTANE-2,3-DICARBOXYLIC ACID (OR) ENDOTHALL
P-LIST " ACUTELY HAZARDOUS WAST	P089	PARATHION (OR) PHOSPHOROTHIOIC ACID, O,O-DIETHYL-O-(4-NITROPHENYL) ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P092	MERCURY (ACETATO-O)PHENYL- (OR) PHENYLMERCURY ACETATE
P-LIST " ACUTELY HAZARDOUS WAST	P093	PHENYLTHIOUREA (OR) THIOUREA, PHENYL-
P-LIST " ACUTELY HAZARDOUS WAST	P094	PHORATE (OR) PHOSPHORODITHIOIC ACID, O,O-DIETHYL S-[(ETHYLTHIO)METHYL] ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P095	CARBONIC DICHLORIDE (OR) PHOSGENE
P-LIST " ACUTELY HAZARDOUS WAST	P096	HYDROGEN PHOSPHIDE (OR) PHOSPHINE
P-LIST " ACUTELY HAZARDOUS WAST	P097	FAMPHUR (OR) PHOSPHOROTHIOIC ACID O-[4-(DIMETHYLAMINO)SULFONYL]PHENYL] O,O-DIMETHYL ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P098	POTASSIUM CYANIDE (OR) POTASSIUM CYANIDE K(CN)

Category	Code	Description
P-LIST " ACUTELY HAZARDOUS WAST	P099	ARGENTATE (1-), BIS(CYANO-C), POTASSIUM (OR) POTASSIUM SILVER CYANIDE
P-LIST " ACUTELY HAZARDOUS WAST	P101	ETHYL CYANIDE (OR) PROPANENITRILE
P-LIST " ACUTELY HAZARDOUS WAST	P102	2-PROPYN-1-OL (OR) PROPARGYL ALCOHOL
P-LIST " ACUTELY HAZARDOUS WAST	P103	SELENOUREA
P-LIST " ACUTELY HAZARDOUS WAST	P104	SILVER CYANIDE (OR) SILVER CYANIDE AG(CN)
P-LIST " ACUTELY HAZARDOUS WAST	P105	SODIUM AZIDE
P-LIST " ACUTELY HAZARDOUS WAST	P106	SODIUM CYANIDE (OR) SODIUM CYANIDE NA(CN)
P-LIST " ACUTELY HAZARDOUS WAST	P108	STRYCHNIDIN-10-ONE, & SALTS (OR) STRYCHNINE, & SALTS
P-LIST " ACUTELY HAZARDOUS WAST	P109	TETRAETHYLDITHIOPYROPHOSPHATE (OR) THIODIPHOSPHORIC ACID, TETRAETHYL ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P110	PLUMBANE, TETRAETHYL- (OR) TETRAETHYL LEAD
P-LIST " ACUTELY HAZARDOUS WAST	P111	DIPHOSPHORIC ACID, TETRAETHYL ESTER (OR) TETRAETHYL PYROPHOSPHATE
P-LIST " ACUTELY HAZARDOUS WAST	P112	METHANE, TETRANITRO- (R) (OR) TETRANITROMETHANE (R)
P-LIST " ACUTELY HAZARDOUS WAST	P113	THALLIC OXIDE (OR) THALLIUM OXIDE TL2O3
P-LIST " ACUTELY HAZARDOUS WAST	P114	SELENIOS ACID, DITHALLUM (1+) SALT (OR) THALLUM(I) SELENITE
P-LIST " ACUTELY HAZARDOUS WAST	P115	SULFURIC ACID, DITHALLUM (1+) SALT (OR) THALLUM(I) SULFATE
P-LIST " ACUTELY HAZARDOUS WAST	P116	HYDRAZINECARBOTHIOAMIDE (OR) THIOSEMICARBAZIDE
P-LIST " ACUTELY HAZARDOUS WAST	P118	METHANETHIOL, TRICHLORO- (OR) TRICHLOROMETHANETHIOL
P-LIST " ACUTELY HAZARDOUS WAST	P119	AMMONIUM VANADATE (OR) VANADIC ACID, AMMONIUM SALT
P-LIST " ACUTELY HAZARDOUS WAST	P120	VANADIUM OXIDE V2O5 (OR) VANADIUM PENTOXIDE
P-LIST " ACUTELY HAZARDOUS WAST	P121	ZINC CYANIDE (OR) ZINC CYANIDE ZNCN2
P-LIST " ACUTELY HAZARDOUS WAST	P122	ZINC PHOSPHIDE ZN3P2, WHEN PRESENT AT CONCENTRATIONS GREATER THAN 10% (R, T)
P-LIST " ACUTELY HAZARDOUS WAST	P123	TOXAPHENE
P-LIST " ACUTELY HAZARDOUS WAST	P124	ACTINOMYCIN D
P-LIST " ACUTELY HAZARDOUS WAST	P127	7-BENZOFURANOL, 2,3-DIHYDRO-2,2-DIMETHYL-, METHYL CARBAMATE (OR) CARBOFURAN
P-LIST " ACUTELY HAZARDOUS WAST	P128	PHENOL, 4-(DIMETHYLAMINO)-3,5-DIMETHYL-, METHYL CARBAMATE (ESTER)
P-LIST " ACUTELY HAZARDOUS WAST	P185	1,3-DITHIOLANE-2-CARBOXYALDEHYDE, 2,4-DIMETHYL-, O- [(METHYLAMINO)-CARBONYL]OXIME (OR) TRIPATE
P-LIST " ACUTELY HAZARDOUS WAST	P188	BENZOIC ACID, 2-HYDROXY-, COMPD. WITH (3AS-CIS)-1,2,3,3A,8,8A-HEXAHYDRO-1,3A,8-TRIMETHYLPYRROLO[2,3-B]INDOL-5-YL METHYL CARBAMATE ESTER (1:1) (OR) PHYSOSTIGMINE SALICYLATE
P-LIST " ACUTELY HAZARDOUS WAST	P189	CARBAMIC ACID, [(DIBUTYLAMINO)-THIO]METHYL-, 2,3-DIHYDRO-2,2-DIMETHYL-, 7-BENZOFURANYL ESTER (OR) CARBOSULFAN
P-LIST " ACUTELY HAZARDOUS WAST	P190	CARBAMIC ACID, METHYL-, 3-METHYLPHENYL ESTER (OR) METOLCARB
P-LIST " ACUTELY HAZARDOUS WAST	P191	CARBAMIC ACID, DIMETHYL-, 1-[(DIMETHYL-AMINO)CARBONYL]-5-METHYL-1H-PYRAZOL-3-YL ESTER (OR) DIMETILAN
P-LIST " ACUTELY HAZARDOUS WAST	P192	ISOLAN (OR) CARBAMIC ACID, DIMETHYL-, 3-METHYL-(1-METHYLETHYL)-1H-PYRAZOL-5-YL ESTER
P-LIST " ACUTELY HAZARDOUS WAST	P194	ETHANIMIDOTHIOIC ACID, 2-(DIMETHYLAMINO)-N-[(METHYLAMINO) CARBONYL]OXY]-2-OXO-, METHYL ESTER (OR) OXAMYL
P-LIST " ACUTELY HAZARDOUS WAST	P196	MANGANESE DIMETHYLDITHIOCARBAMATE (OR) MANGANESE, BIS(DIMETHYL CARBAMODITHIOATO-S,S)-
P-LIST " ACUTELY HAZARDOUS WAST	P197	FORMPARANATE (OR) METHANIMIDAMIDE, N,N-DIMETHYL-N'-[2-METHYL-4-[(METHYLAMINO)CARBONYL]OXY]PHENYL]
P-LIST " ACUTELY HAZARDOUS WAST	P198	METHANIMIDAMIDE, N,N-DIMETHYL-N'-[3-[(METHYLAMINO)-CARBONYL]OXY]PHENYL]-, MONOHYDROCHLORIDE (OR) FORMETANATE HYDROCHLORIDE

Category	Code	Description
P-LIST " ACUTELY HAZARDOUS WAST	P199	METHIOCARB (OR) MEXACARBATE (OR) PHENOL, (3,5-DIMETHYL-4-(METHYLTHIO), METHYL CARBAMATE
P-LIST " ACUTELY HAZARDOUS WAST	P201	PHENOL, 3-METHYL-5-(1-METHYLETHYL)-, METHYL CARBAMATE (OR) PROMECARB
P-LIST " ACUTELY HAZARDOUS WAST	P202	M-CUMENYL METHYL CARBAMATE (OR) 3-ISOPROPYLPHENYL N-METHYL CARBAMATE (OR) PHENOL, 3-(1-METHYLETHYL)-, METHYL CARBAMATE
P-LIST " ACUTELY HAZARDOUS WAST	P203	ALDICARB SULFONE (OR) PROPANAL, 2-METHYL-2-(METHYL-SULFONYL)-, O-[(METHYLAMINO)CARBONYL] OXIME
P-LIST " ACUTELY HAZARDOUS WAST	P204	PHYSOSTIGMINE (OR) PYRROLID[2,3-B]INDOL-5-OL, 1,2,3,3A,8,8A-HEXAHYDRO-1,3A,8-TRIMETHYL-METHYL CARBAMATE (ESTER), (3AS-CIS)-
P-LIST " ACUTELY HAZARDOUS WAST	P205	ZINC, BIS(DIMETHYL CARBAMODITHIOATO-S,S'), (OR) ZIRAM
TOXIC WASTE	U001	ACETALDEHYDE (I) (OR) ETHANAL (I)
TOXIC WASTE	U002	2-PROPANONE (I) (OR) ACETONE (I)
TOXIC WASTE	U003	ACETONITRILE (I,T)
TOXIC WASTE	U004	ACETOPHENONE (OR) ETHANONE, 1-PHENYL-
TOXIC WASTE	U005	2-ACETYLAMINOFLOURENE (OR) ACETAMIDE, N-9H-FLUOREN-2-YL
TOXIC WASTE	U006	ACETYL CHLORIDE (C,R,T)
TOXIC WASTE	U007	2-PROPENAMIDE (OR) ACRYLAMIDE
TOXIC WASTE	U008	2-PROPENOIC ACID (I) (OR) ACRYLIC ACID (I)
TOXIC WASTE	U009	2-PROPENITRILE (OR) ACRYLONITRILE
TOXIC WASTE	U010	AZIRINO [2',3':3,4]PYRROLO[1,2-A]INDOLE-4,7-DIONE, 6-AMINO-8-[[AMINOCARBONYL]OXYMETHYL]-1,1A,2,8,8A,8B-HEXAHYDRO-8A-METHOXY-5-METHYL-, [1AS-(1AALPHA, 8BETA, 8AALPHA, 8BALPHA)]- (OR) MITOMYCIN C
TOXIC WASTE	U011	1H-1,2,4-TRIAZOL-3-AMINE (OR) AMITROLE
TOXIC WASTE	U012	ANILINE (I,T) (OR) BENZENAMINE (I,T)
TOXIC WASTE	U014	AURAMINE (OR) BENZENAMINE, 4,4'-CARBONIMIDOYLBIS[N,N-DIMETHYL-
TOXIC WASTE	U015	AZASERINE (OR) L-SERINE DIAZOACETATE (ESTER)
TOXIC WASTE	U016	BENZICACRIDINE
TOXIC WASTE	U017	BENZAL CHLORIDE (OR) BENZENE, (DICHLOROMETHYL)-
TOXIC WASTE	U018	BENZ[ANTHRACENE
TOXIC WASTE	U019	BENZENE (I,T)
TOXIC WASTE	U020	BENZENESULFONIC ACID CHLORIDE (C,R) (OR) BENZENESULFONYL CHLORIDE (C,R)
TOXIC WASTE	U021	[1,1'-BIPHENYL]4,4'-DIAMINE (OR) BENZIDINE
TOXIC WASTE	U022	BENZOL[PYRENE
TOXIC WASTE	U023	BENZENE, (TRICHLOROMETHYL)- (OR) BENZOTRICHLORIDE (C,R,T)
TOXIC WASTE	U024	DICHLOROMETHOXY ETHANE (OR) ETHANE, 1,1'-[METHYLENEBIS(OXY)]BIS[2-CHLORO-
TOXIC WASTE	U025	DICHLOROETHYL ETHER (OR) ETHANE, 1,1'-OXYBIS[2-CHLORO-
TOXIC WASTE	U026	CHLORNAFHAZIN (OR) NAPHTHALENAMINE, N,N'-BIS[2-CHLOROETHYL]-
TOXIC WASTE	U027	DICHLOROISOPROPYL ETHER (OR) PROPANE, 2,2-OXYBIS[2-CHLORO-
TOXIC WASTE	U028	1,2-BENZENEDICARBOXYLIC ACID, BIS(2-ETHYLHEXYL) ESTER (OR) DIETHYLHEXYL PHTHALATE
TOXIC WASTE	U029	METHANE, BROMO- (OR) METHYL BROMIDE
TOXIC WASTE	U030	4-BROMOPHENYL PHENYL ETHER (OR) BENZENE, 1-BROMO-4-PHENOXY-
TOXIC WASTE	U031	1-BUTANOL (I) (OR) N-BUTYL ALCOHOL (I)
TOXIC WASTE	U032	CALCIUM CHROMATE (OR) CHROMIC ACID H2CRO4, CALCIUM SALT
TOXIC WASTE	U033	CARBON OXYFLUORIDE (R,T) (OR) CARBONIC DIFLUORIDE





**Mayor and Council Offices**

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April 19, 2023

Yuma County Planning and Zoning Commission  
Department of Development Services  
2351 W. 26<sup>th</sup> Street  
Yuma, Arizona 85364

Matias Rosales, Chairman  
Danny Bryant, Vice-Chairman  
Ron Rice, Member  
Tim Bowers, Member  
Jim Allen, Member  
Ron Van Why, Member  
Scott Mulhern, Member  
Gary Black, Member  
Bobbi McDermont, Member  
AJ Mosqueda, Member

**Re: Hazardous Waste Special Use Permit, Case No. 23-01**

Dear Mr. Chairman and Commissioners:

Thank you to the Yuma County Planning and Zoning staff for bringing this matter, Special Use Permit No. 23-01, to the City of Yuma's attention. Your outreach and notice has raised the concern of the City Council, and as an elected body dedicated to serving the best interest of all City of Yuma residents and the Yuma community, we appreciate this opportunity to comment.

The Yuma County Special Use Permit for the handling and storage of Hazardous Waste at 2264 E. 13<sup>th</sup> Street by AA Sydcoll, LLC, is proposed for the wrong location, far from any City designated hazardous waste trucking route and too near residential and agricultural properties. As the public body charged with the final determination on such matters within City boundaries, the City Council would try to examine every aspect of a proposed hazardous waste facility so close to Yuma's primary commercial center.

While City Council understands that AA Sydcoll currently operates an existing *non-hazardous* waste transfer operation on the 4.75 acre site, *hazardous wastes* are specifically listed by the Environmental Protection Agency (EPA) and exhibit unique characteristics such as ignitability, corrosiveness, reactivity, and/or toxicity, all of which present individual perils and concerns, but in combination, pose potentially even greater hazards so near to Yuma's center of commerce.

The already issued, Arizona Department of Environmental Quality (ADEQ) hazardous waste permit, provides for an estimated total of 226,724,000 pounds (113,362 tons) of hazardous waste into and out of

the site annually, but operationally, still requires a Special Use Permit from Yuma County. What may not be realized is approximately 4,100 feet away are 3 parcels recently purchased by Yuma Regional Medical Center for future growth. The Sydcol site is only 1260 feet from the always busy Sam's Club parcel, 1,617 feet from the 3,000-plus capacity Harkins Theaters parcel, immediately adjacent to productive farmland north of the site, as well as close to areas containing more than 100 residential units, the nearest of which are mobile homes approximately 400 feet away. Moreover, there are serious concerns with water capacity at the site in the event of a fire or hazardous substance release, as well as the complete lack of any specific emergency plan discussion by the applicant with the City of Yuma Police and Fire Departments in the event an evacuation or Hazmat Response through the City's Mutual Aid Agreement with Rural Metro becomes necessary. The site is less than 300 feet away from the City of Yuma municipal boundary and the impact of shutting down the Yuma Palms Mall even for one day, much less a longer period similar to the 1997 nitric acid spill, would affect tens of thousands of people.

Something that was probably missed during the application process with the Arizona Department of Environmental Quality (ADEQ) is the site's proximity to a Bureau of Reclamation (BOR) dewatering well (SG 709R) whose boundary is approximately 60 feet from the AA Sydcol property. As you may be aware, the water table in this area rises to approximately 12 feet, and to protect the farmland, BOR operates a series of dewatering wells.

Dewatering well SG 709R removes adjacent groundwater from the immediate area, which flows west to Pacific Avenue through a pipeline located within a 30 foot easement bordering the AA Sydcol property. The water then flows to Drainage Pump Outlet Conveyance #4 that runs north along Pacific Avenue and empties into a side channel in the East Wetlands of the Colorado River. The Bureau of Reclamation shows this on a map at: [www.usbr.gov/lc/yuma/programs/YAWMS/Groundwater/SG202208.pdf](http://www.usbr.gov/lc/yuma/programs/YAWMS/Groundwater/SG202208.pdf). In the Hazardous Waste permit, there is no mention of any contingency planning in the event of a release or accidental spill reaching this pipeline to the waters of the United States. It appears this was never discussed with ADEQ, EPA, BOR, the Army Corps of Engineers, or the City of Yuma.

For all of these reasons, the City Council of the City of Yuma, both individually and as a public body, urge you to recommend denial of the Hazardous Waste Special Use Permit to AA Sydcol, LLC, Case No. 23-01, at the Planning and Zoning Commission meeting of April 25, 2023. Should you have any questions, please do not hesitate to call upon City staff, or any of us individually.

Sincerely,



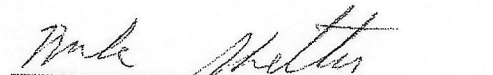
Chris Morris  
Deputy Mayor



Gary Knight  
Yuma City Councilmember



Ema Lea Shoop  
Yuma City Councilmember



Mike Shelton  
Yuma City Councilmember



Art Morales  
Yuma City Councilmember



Carol Smith  
Yuma City Councilmember