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April 8, 2025

The Honorable City Council
C/O City Administrative Officer
200 North Spring Street, Room 360
Los Angeles, CA 90012

Honorable Members:

Clean Harbors (C.F. 25-0166)

This letter is submitted in response to various questions presented by the Public Safety Committee at the April 2, 2024 meeting with regard to the proposal to contract with Clean Harbors for environmental services. The proposed agreement will provide for the routine hazardous waste management services at the Fire Department's 106 fire stations and other facilities, as well as emergency hazardous materials cleanup services on an as-needed basis. The hazardous waste materials that require proper disposal include, but are not limited to, materials resulting from maintenance to the Department's light vehicles and heavy apparatus (e.g., motor oil, oil filters, oil rags, brake fluid, anti-freeze), cooking oil, contaminated personnel protective equipment, and bio-hazardous materials resulting from providing emergency medical services (e.g., sharps).

The collection and proper disposal of the hazardous materials are critical to the health and safety of the LAFD's personnel and the surrounding areas.

- a) Whether Clean Harbors Environmental Services has any recent safety issues on job sites, any injuries or other health and safety matters that have arisen in jobs that they have done for the City. Whether any workers who are under any collective bargaining agreement are paid prevailing wages.**

Pursuant to the U.S. Department of Labor – Occupational Safety and Health Administration's Inspections, there have been no recent health and safety issues occurring in the City of Los Angeles.

Workers under the proposed contract are not under any collective bargaining agreement. Further, the services that will be provided are not considered to be construction, alteration, demolition, installation or repair work pursuant to the State's *prevailing wage* requirements (California Labor Code Section 1720). However, the workers will be paid in accordance with the City's Living Wage Ordinance.

b) Who Clean Harbors subcontracts with for their work. Do they subcontract for local workers? Do they subcontract for workers out of area? Local hire being very important to this analysis.

Per the City's Business Inclusion Program (BIP), proposers were required to do an outreach regarding any work that can be subcontracted out, in order to give various Business Enterprises (e.g., MBE, WBE) an opportunity to participate in the contract. The subcontractors listed by all four proposers are not based in the City of Los Angeles.

However, proposers were also required to submit their Business Locations and Workforce Information, and provided the following information:

1. Clean Harbors: Three (3) branch locations within the City; twenty-seven (27) employees residing in the City.
2. United Pumping Service: No branch locations within the City; twelve (12) employees residing in the City.
3. NRC Environmental Services (Republic Services): No branch locations within the City; no employees residing in the City.
4. Hunter Consulting Inc. dba HCI Environmental & Engineering: No branch locations within the City; no employees residing in the City.

Of the four proposals, Clean Harbors is the only proposer who has locations within the City and has the most employees residing in the City.

c) How does Clean Harbors compare on their subcontracting to their direct competitors?

Per the City's Business Inclusion Program (BIP), the percentage of the participation by various Business Enterprises on the proposed contract are:

1. Clean Harbors: 10.9%
2. NRC Environmental Services (Republic Services): 11%
3. United Pumping Service: 3%
4. Hunter Consulting Inc. dba HCI Environmental & Engineering: To be determined

d) How long as Clean Harbors been working for the City? Does the City have any history with them or any recent issues related to work or safety issues, as they have performed for the City of Los Angeles, including the Bureau of Sanitation or anywhere.

Clean Harbors Environmental Services, Inc. has been providing routine and emergency hazardous materials waste management services to the City for over twenty years. Pursuant to the City Clerk's Contracts database, Clean Harbors has been contracting with the City of Los Angeles since at least April 20, 2001. Since that time, they have contracted with seven other City Departments (Convention Center, Fire, General Services, Police, Public Works – Sanitation, Public Works – Street Services, and Transportation). Pursuant to the U.S. Department of Labor – Occupational Safety and Health Administration's Inspections, there have been no health and safety issues occurring in the City of Los Angeles since that time.

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Please contact Emilio Rodriguez, Fire Administrator, Administrative Services Bureau, at (213) 978-3731 or Martin Mullen, Battalion Chief, Fire Facilities Section, at (213) 202-3423 should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, reading "Ronnie Villanueva". The signature is fluid and cursive, with the first name "Ronnie" and last name "Villanueva" clearly distinguishable.

RONNIE R. VILLANUEVA
Interim Fire Chief