Responses to Comments and Errata Final Mitigated Negative Declaration – Initial Study No. 710 for the Proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill SCH #: 2022020473



CEQA Lead Agency: County of Orange OC Waste & Recycling Attn: Aimee Halligan, CEQA Manager 601 N. Ross Street, 5th Floor Santa Ana, CA 92701

April 2022

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Attachment A Final Mitigation Monitoring and Reporting Program

1.0 Introduction

This Responses to Comments (RTC) document, in conjunction with the Draft Initial Study/Mitigated Negative Declaration (IS/MND) responds to comments on the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill (Project). While the State of California Environmental Quality Act (CEQA) Guidelines do not require a final initial study or the preparation of formal responses to comments received during the public review period for an Initial Study/Mitigated Negative Declaration, the County of Orange (County) is making available responses to the comments received during the public review process, to provide further disclosure about the proposed project consistent with Section 11.7 of the 2020 Local CEQA Procedures Manual.

1.1 Background of Environmental Review Process for the Project

The IS/MND, along with a Notice of Intent to Adopt a Mitigated Negative Declaration, was released for public and agency review on February 22, 2022, with a 30-day review period ending on March 23, 2022. Documents were also uploaded to the State Clearinghouse Website (SCH Number 2022020473). The NOI was also posted at the Orange County Clerk-Recorder on February 22, 2022, and copies of the IS/MND were made available for review at the following locations:

- County of Orange, 601 N. Ross Street, Santa Ana, CA 92701
- County of Orange website at: <u>https://oclandfills.com/page/olinda-technical-documents</u>

OCWR held a public information meeting on March 2, 2022 regarding the proposed Valencia Greenery composting operation at the Olinda Alpha Landfill (Olinda). The purpose of the public meeting was to explain the proposed project and to solicit any comments from the public related to either the project or the CEQA Mitigated Negative Declaration prepared for the project. Public were notified of where they are able to review the MND documents (online or at OCWR Headquarters offices in Santa Ana), how they can provide comments (during the meeting, by mail, or by email), and were advised of the public review period timeframe (February 22 – March 23, 2022). To provide advance notice of the project and planned meeting, notice was sent by direct mail one week before the event which included basic information about the project, information about the public informational meeting, where CEQA documents are available for review and comment, and contact information for questions and how to receive additional information.

OCWR sent out approximately 12,679 notices to owners/occupants living within or owning property approximately 1.5 mile from the project site. In addition, the notice was made available on OCWR's website, was posted with the State Clearinghouse (SCH) and was directly mailed along with a hard copy of the Draft MND to the distribution list included as Appendix A of the Draft MND.

1.2 Intended Uses of this IS/MND

The IS/MND will be used by the County in considering approval of the proposed project. In accordance with CEQA Guidelines § 15074, the IS/MND will be used as the environmental document in consideration of all subsequent planning and permitting actions associated with the proposed project, to the extent such actions require CEQA compliance and as otherwise permitted under applicable law.

15074. CONSIDERATION AND ADOPTION OF A NEGATIVE DECLARATION OR MITIGATED NEGATIVE DECLARATION.

- a) Any advisory body of a public agency making a recommendation to the decision-making body shall consider the proposed negative declaration or mitigated negative declaration before making its recommendation.
- b) Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.
- c) When adopting a negative declaration or mitigated negative declaration, the lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.
- *d)* When adopting a mitigated negative declaration, the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects.
- e) A lead agency shall not adopt a negative declaration or mitigated negative declaration for a project within the boundaries of a comprehensive airport land use plan or, if a comprehensive airport land use plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, without first considering whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area.
- f) When a non-elected official or decision-making body of a local lead agency adopts a negative declaration or mitigated negative declaration, that adoption may be appealed to the agency's elected decision-making body, if one exists. For example, adoption of a negative declaration for a project by a city's planning commission may be appealed to the city council. A local lead agency may establish procedures governing such appeals. Upon review and consideration of the IS/MND, the County may take action to adopt, revise, or reject the proposed project. A decision to approve the proposed project would be made in a resolution recommending certification of the IS/MND as part of the consideration of the proposed project. The County has prepared this IS/MND and has determined that the environmental impacts of the proposed project have been reduced to a less than significant level through mitigation measures.

2.0 Public Comments and Responses Received During the Public Review Period

During the public review period for the MND, OC Waste & Recycling received comments on the proposed Project from the California Department of Resources Recycling and Recovery (CalRecycle), Local Enforcement Agency (LEA), South Coast Air Quality Management District (SCAQMD), and City of Irvine Brea (Brea). The environmental topics addressed in the comments included odors, dust, emissions, aesthetics, and water availability and infrastructure and traffic. Comment letters received as well as response letters provided to each commenting agency are included in this section. Each comment letter and response letter is labeled by number (i.e. CL-1 for Comment Letter-1 and RL-1 for the Response Letter to Comment Letter-1). The comments do not present substantial evidence to challenge the adequacy of the analysis and conclusions in the MND that the proposed Project will not result in significant environmental impacts. The comments also do not contain any new information that would necessitate recirculation under CEQA Guidelines Section 15073.5.

CalRecycle Comments & Response to Comments CL-1/RL-1 **California Environmental Protection Agency**

Gavin Newsom California Governor



Jared Blumenfeld Secretary for Environmental Protection Rachel Machi Wagoner CalRecycle Director

March 22, 2022

Aimee Halligan, Administrative Manager Orange County Waste & Recycling 601 N. Ross St., 5th Floor Santa Ana, CA 92701

Subject: SCH No. 2022020473 – Proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill – Orange County (Facility No. 30-AB-0470)

Dear Ms. Halligan:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

Orange County Waste & Recycling (OCWR), acting as Lead Agency, has prepared and circulated a Draft Mitigated Negative Declaration (MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

OCWR is proposing to construct and operate a composting facility, the Valencia Greenery, at the active Olinda Alpha Landfill (Facility No. 30-AB-0035), which is located at 1942 Valencia Avenue, Brea, CA 92823. Currently, OCWR has implemented an open windrow pilot project tiered as an Enforcement Agency Notification (EAN) at the Olinda Alpha Landfill and is in the approval process with the Local Enforcement Agency to begin a Covered Aerated Static Pile (CASP) pilot project in the near future. Following these pilot projects, the full-scale Valencia Greenery composting facility at the Olinda Alpha Landfill will be constructed and implemented. A maximum of 230 tons per day (TPD) of processed green material (PGM) that was already being received at the landfill will be transferred over to the Valencia Greenery facility. The Valencia Greenery composting facility will be developed on an approximate 9.0-acre pad located at the northeastern portion of the landfill, in an area that is not currently being used for active landfilling. The pad, consisting of asphalt paving (for the perimeter road) or a layer of crushed asphalt concrete (the composting deck) will be placed over the entire landfill area, where the composting will occur, so that there will be no impacts to the underlying waste prism.

The total area of the facility, including the compost pad and all appurtenant structures will be approximately 15.3 acres. The hours of operation will be the same as Olinda Alpha Landfill,

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MND for Valencia Greenery (30-AB-0470) March 22, 2022 Page 2 of 3

6:00 a.m. to 4:00 p.m., Monday through Saturday. The Valencia Greenery will be open on Sundays for composting operations only. The facility will be developed in two phases: Phase I – Open Windrow Composting; and Phase II – CASP Composting. At full capacity, the project will result in 58 average daily trips; Olinda Alpha Landfill generates 677 vehicle trips per day.

The proposed Valencia Greenery will have the ability to accept any green and agricultural material that contains no greater than 1.0 percent of physical contaminants by dry weight and meets maximum contamination requirements. Initially, arriving materials will already have been pre-processed (chipped and ground and contaminants removed) and will be consolidated at the material receiving area prior to deployment into windrows. OCWR plans to ultimately include chipping and grinding as well as a conveyor in the operation to allow for recovery of other types of uncontaminated compostable organic materials from the landfill (i.e., wood waste). Eventually food waste may also be included into the feedstock during Phase 2 operations (up to 50% of the feedstock). The proposed composting facility will allow the County and incorporated cities to divert organic waste materials from landfill disposal, in compliance with recent State mandates.

COMMENTS

Hours

The MND indicates the hours of operation will be the same as the Olinda Alpha Landfill, 6:00 a.m. to 4:00 p.m., Monday through Saturday and will be open on Sundays for composting operations only. The current Solid Waste Facility Permit for Olinda Alpha Landfill includes hours for the receipt of refuse from 6:00 a.m. to 4:00 p.m., Monday through Saturday and ancillary operations (Construction and Maintenance) 24 hours Monday through Sunday. Will the receipt of material be 6:00 a.m. to 4:00 p.m. Monday through Saturday? Will there be any ancillary hours (e.g., construction, maintenance, processing material, windrow turning, etc.) beyond 6:00 a.m. to 4:00 p.m. Monday? Please describe and analyze for any ancillary hours for the project.

Solid Waste Regulatory Oversight

The Orange County Environmental Health Division, Local Enforcement Agency (LEA) is responsible for providing regulatory oversight of solid waste handling and disposal activities, including inspections and permitting. Please contact the LEA, Lauren Robinson, at 714.433.6011 or by e-mail at LRobinson@ochca.com to discuss solid waste regulatory requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the MND and hopes that this comment letter will be useful to the Lead Agency in preparing the Final MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this proposed project.

CL-1

MND for Valencia Greenery (30-AB-0470) March 22, 2022 Page 3 of 3

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Sincerely,

Megan Emplander

Megan Emslander, Environmental Scientist Permitting & Assistance Branch – South Unit Waste Permitting, Compliance & Mitigation Division CalRecycle

CC: Ben Escotto, Supervisor Permitting & Assistance Branch – South Unit

> Lauren Robinson, Program Manager Orange County LEA



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(Letter Sent Via Email)

April 13, 2022

Megan Emslander, Environmental Scientist Permitting & Assistance Branch – South Unit Waste Permitting, Compliance & Mitigation Division California Environmental Protection Agency California Department of Resources Recycling & Recovery 1001 I Street Sacramento, CA 95814

Subject: OC Waste & Recycling Responses to CalRecycle Comments on MND for Valencia Greenery Composting Operation, Facility Number 30-AB-0470 – Orange County (SCH No. 2022020473)

Dear Ms. Emslander:

Thank you for the CalRecycle comment letter regarding the Mitigated Negative Declaration (MND) for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill. The County of Orange, OC Waste & Recycling department (OCWR) appreciates CalRecycle's engagement with this project. OCWR has the following responses to your comment letter dated March 22, 2022 regarding the Mitigated Negative Declaration (MND) for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill.

Comment 1:

Hours

The MND indicates the hours of operation will be the same as the Olinda Alpha Landfill, 6:00 a.m. to 4:00 p.m., Monday through Saturday and will be open on Sundays for composting operations only. The current Solid Waste Facility Permit for Olinda Alpha Landfill includes hours for the receipt of refuse from 6:00 a.m. to 4:00 p.m., Monday through Saturday and ancillary operations (Construction and Maintenance) 24 hours Monday through Sunday. Will the receipt of material be 6:00 a.m. to 4:00 p.m. Monday through Saturday? Will there be any ancillary hours (e.g., construction, maintenance, processing material, windrow turning, etc.) beyond 6:00 a.m. to 4:00 p.m. Monday through Sunday? Please describe and analyze for any ancillary hours for the project.

Response 1:

Hours of operation and ancillary activities are stated and analyzed in the draft MND.

Page 14 of Section 1.6 Project Description of the MND states "For the acceptance of compostable organic waste materials, the Valencia Greenery will have the same hours of

operation as the Olinda Alpha Landfill – Monday through Saturday, 6 AM - 4 PM. No incoming compostable organic waste materials will be accepted on Sundays and the six major holidays (New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day). The Valencia Greenery will be open on Sundays for composting operations only, primarily to monitor the compost piles." Such operations on Sundays would also generally be limited to 6:00 a.m. to 4:00 p.m.

In addition, Page 65 of Section 2.13 (Noise), also lists Project Design Features and Operational Control Measures (PDF & OCM) for noise reduction, which states the following:

"(Noise Control PDF & OCM -1) Construction activities will be limited to between the hours of 7:00 a.m. and 7:00 p.m. on Mondays through Saturdays. The County of Orange shall have the discretion to permit construction activities to occur outside of the allowable hours if compelling circumstances warrant such an exception (e.g., weather conditions to pour concrete)."

"(Noise Control PDF & OCM-2) Construction contractors shall limit haul truck deliveries to between the hours of 6:00 a.m. and 7:00 p.m. on Mondays through Saturdays, with a start time consistent with the start of site operational hours (except in the case of urgent necessity)."

Comment 2:

Solid Waste Regulatory Oversight

The Orange County Environmental Health Division, Local Enforcement Agency (LEA) is responsible for providing regulatory oversight of solid waste handling and disposal activities, including inspections and permitting. Please contact the LEA, Lauren Robinson, at 714.433.6011 or by e-mail at <u>LRobinson@ochca.com</u> to discuss solid waste regulatory requirements for the proposed project.

Response 2:

OCWR will continue to coordinate with Lauren Robinson and her staff with the Orange County Solid Waste Local Enforcement Agency (LEA) regarding the proposed Valencia Greenery composting operation project at the Olinda Alpha Landfill.

Comment 3:

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the MND and hopes that this comment letter will be useful to the Lead Agency in preparing the Final MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing,

CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

Response 3:

OCWR will comply with this comment.

Please let me know if you would like to discuss any of the responses above. OCWR looks forward to working with CalRecycle and the LEA during the permitting of this project. I can be reached at (714) 834-4107 or by email at <u>aimee.halligan@ocwr.ocgov.com</u>.

Sincerely,

Année Halligan

Aimee Halligan CEQA Manager

RL-1

LEA Comments & Responses to Comments CL-2/RL-2



PUBLIC HEALTH SERVICES ENVIRONMENTAL HEALTH

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March 23, 2022

Aimee Halligan Administrative Manager OC Waste & Recycling 601 N. Ross Street, 5th Floor Santa Ana, CA 92701

Sent via email: <u>Aimee.Halligan@ocwr.ocgov.com</u>

Subject: Draft Mitigated Negative Declaration – Initial Study, SCH # 2022020473 for Proposed Valencia Greenery Composting Operation, Orange County (SWIS No. 30-AB-0470)

Dear Ms. Halligan:

The Orange County Waste & Recycling (OCWR), acting as Lead Agency, has prepared and circulated a Draft Mitigated Negative Declaration (MND) – Initial Study No. 710 dated January 2022 in order to comply with the California Environmental Quality Act (CEQA) and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project. OCWR is proposing to construct and operate a new composting facility, Valencia Greenery, at the active Olinda Alpha Landfill (SWIS No. 30-AB-0035), which is located at 1942 Valencia Avenue, Brea CA.

The Orange County Environmental Health Division, Solid Waste Local Enforcement Agency (LEA) is responsible for providing regulatory oversight of solid waste handling and disposal activities, including inspections and permitting of the new Valencia Greenery to operate as a composting facility. Based on the review of the Draft MND, the LEA is providing comments that have been included as an attachment to this letter.

The Orange County LEA would like to thank OCWR for the opportunity to review and comment on the Draft MND and hopes that this comment letter will be helpful in preparing the Final MND as part of the CEQA and permitting process. Please keep the LEA apprised and submit copies of any subsequent environmental documents, public notices, and any Notices of Determination for this proposed project.

If you have any questions, please call me at (714) 433-6011 or Shyamala Rajagopal, Hazardous Materials Specialist at (714) 433-6273.

Sincerely,

Lauren Robinson, REHS, CCS Program Manager Environmental Health Division

Attachment: LEA Comments on Draft MND dated January 2022

LEA Comments on Draft Mitigated Negative Declaration – Initial Study No. 710 for Proposed Valencia Greenery Composting Operation at Olinda Alpha Landfill

- The landfill is currently estimated to reach permitted capacity and cease accepting solid waste for disposal in 2036.
 Comment: Will composting operations also cease in 2036 or does OCWR intend in continuing Valencia Greenery operations beyond 2036?
- 2. Currently, OCWR has implemented an open windrow pilot project at the Olinda Alpha Landfill and is in the approval process with the Local Enforcement Agency (LEA, local entity that inspects solid waste facilities and is designated to act on behalf of the California Department of Resources Recycling and Recovery (CalRecycle)) to begin a Covered Aerated Static Pile (CASP) pilot project in the near future. Following these pilot projects, the full-scale Valencia Greenery composting operation at the Olinda Alpha Landfill will be constructed and implemented.

Comment: What's the status of this pilot project? Is OCWR still planning to proceed with this CASP pilot project prior to full scale implementation? If not proceeding with the pilot project, how will it be evaluated as to which method will be effective for full scale operation?

3. Page 5 of the Initial Study states: The open windrow composting pilot facility at the Olinda Alpha Landfill is located on an approximately one-acre area in the equipment maintenance area.

Comment: The windrow composting pilot project is now suspended and has been inactive at Olinda Landfill for over a year now. Please reflect the current status in the document.

- 4. Page 7 of the Initial Study states: A portion of the PGM that is already being received each day would simply be transferred to the Valencia Greenery.
 Comment: Please clarify if PGM is still being received at Olinda Landfill. If not, please make appropriate revisions related to PGM use in the rest of the document and in the Draft Odor Impact Minimization Plan.
- The facility will be developed in two phases: Phase I Open Windrow Composting; and Phase II – CASP Composting.
 Comment: Will Phase I and Phase II operate concurrently? Or will Phase I cease operation as it is temporary when Phase II is started, or will there be an overlap of operations? Will entire composting operation become a CASP operation? Please elaborate and make it clear.

- Page 9 of the Initial Study states: Five full-time employees will be needed to provide sufficient staffing for days off, vacations, etc.
 Comment: Are number of employees specified here only for Phase I operation or for both Phase I and II operations?
- 7. Page 38 of the Initial Study states: All odor complaints received from potential receptors and/or regulators shall be recorded in the facility operational logbook and complaint log. Comment: Although two odor complaint logs will be kept for the two separate permits (landfill and composting operations), how will odor complaints be differentiated between landfill and composting operations? Will a procedure be in place?
- Page 52 of the Initial Study states: The proposed composting operation will generate leachate from the composting process which will be collected and reused in the composting operation.
 Comment: Will the leachate be tested prior to reuse? Is this acceptable to the RWQCB?
- Page 65 of the Initial Study states: Olinda Alpha Landfill that accepts approximately 6,850 tons of solid waste per day and approximately 5,175 tons of exempt wastes (i.e., processed green material for erosion control, asphalt and soil) per day.
 Comment: Is processed green material still used for erosion control? If no, please revise the document accordingly.
- 10. Page 36 of the Initial Study and Page 3 of Appendix B (MMRP) states: (Air Quality-Odor Control PDF & OCM-8) states: For the open windrow composting operation in Phase I, the feedstock materials will be formed into elongated piles/open windrows, with dimensions not exceeding 12 feet in height, 20 feet in length and 100 feet long for composting with the addition of moisture as needed by the on-site water truck. **Comment:** How about Phase II operation, not mentioned here or in Pages 4 and 5?
- 11. Section 5.7 of the Draft OIMP states: Feedstock with greater than 50% moisture content will not be accepted.Comment: Please elaborate how will this be determined in the field and rejected?



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(Letter Sent Via Email)

April 13, 2022

Shyamala Rajagopal Orange County Solid Waste Local Enforcement Agency HCA/Environmental Health Division 1241 E. Dyer Road, Suite 120 Santa Ana, CA 92705-5611

Subject: OC Waste & Recycling Responses to LEA Comments on MND for Valencia Greenery Composting Operation, Facility Number 30-AB-0470 – Orange County (SCH No. 2022020473)

Dear Ms. Rajagopal:

Thank you for the Local Enforcement Agency's (LEA) comment letter regarding the Mitigated Negative Declaration (MND) for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill. The County of Orange, OC Waste & Recycling department (OCWR) appreciates the LEA's engagement with this project and the dialogue between OCWR and the LEA regarding this project throughout its development. OCWR has the following responses to your comment letter dated March 23, 2022 regarding the Mitigated Negative Declaration (MND) for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill.

Comment 1:

The landfill is currently estimated to reach permitted capacity and cease accepting solid waste for disposal in 2036. Will composting operations also cease in 2036 or does OCWR intend in continuing Valencia Greenery operations beyond 2036?

Response 1:

Landfilling operations at the Olinda Alpha landfill are currently permitted through the year 2036. Composting operations may continue beyond 2036, although acceptance of solid waste for disposal will have ceased at that time.

Comment 2:

Currently, OCWR has implemented an open windrow pilot project at the Olinda Alpha Landfill and is in the approval process with the Local Enforcement Agency (LEA, local entity that inspects solid waste facilities and is designated to act on behalf of the California Department of Resources Recycling and Recovery (CalRecycle)) to begin a Covered Aerated Static Pile (CASP) pilot project in the near future. Following these pilot projects, the full-scale Valencia Greenery composting operation at the Olinda Alpha Landfill will be constructed and

implemented.

What's the status of this pilot project? Is OCWR still planning to proceed with this CASP pilot project prior to full scale implementation? If not proceeding with the pilot project, how will it be evaluated as to which method will be effective for full scale operation?

Response 2:

At the time of preparation of the MND, OCWR was still pursuing the CASP pilot project at the Valencia Greenery. However, OCWR has since determined not to move forward with the CASP pilot project at Olinda Alpha landfill. Decisions on how to proceed at Valencia Greenery will be based on OCWR experience from the pilot projects and full-scale composting operations that are already in place and active at the Bee Canyon Greenery located at Frank R. Bowerman Landfill in Irvine and at the Capistrano Greenery at Prima Deshecha Landfill in San Juan Capistrano, on research of the available technologies and products for CASP, cost and operational efficacy, and monitoring capabilities of the available technologies. OCWR will evaluate and select the option with the greatest benefit to operational efficiency and efficacy. The particular CASP product selected will not result in a change in the environmental analysis or conclusions outlined in the MND.

OCWR will revise the text of Section 1.6 Project Description – *Demonstration CASP Pilot Composting Operation at the Olinda Alpha Landfill*, on page 5-6 to clarify the demonstration project status, as shown below. Deleted text is shown in strikeout, and added text is underlined.

"As of the writing of this document, the proposed CASP pilot project is in the LEA approval process and was anticipated to should be in operation in 2022. Since that time OCWR has elected not to proceed with this pilot project, and but the anticipated process that was approved by the LEA is described below. The demonstration pilot CASP composting operation at the Olinda Alpha Landfill will was to be located on an approximate 1-acre area in the existing equipment maintenance area. This area of the landfill is not currently being used for active landfill disposal. Material feedstocks to be used for composting included source separated residential curbside green waste, commercial green waste, processed green waste and wood waste. These materials are already being delivered to the landfill. The demonstration pilot composting operation was planned to will not have more than 2,000 tons (i.e., 5,000 cubic yards) of material onsite at any one time or process more than 250 tons of material per year. The feedstock would be is placed on top of a crushed asphalt surface for all weather access and surrounded by an earthen berm to prevent storm water run-on and run-off. Any green waste received that is noticeably highly odorous and determined to have the potential to contribute to off-site odors, or contaminated with residual solid waste, would be is-diverted and disposed at the active area of the landfill. The demonstration pilot composting operation will continue at the landfill as a research project, so that OCWR can continue to learn about composting, until such time as the Valencia Greenery is fully permitted and operational."

Comment 3:

Page 5 of the Initial Study states: The open windrow composting pilot facility at the Olinda Alpha Landfill is located on an approximately one-acre area in the equipment maintenance area.

The windrow composting pilot project is now suspended and has been inactive at Olinda Landfill for over a year now. Please reflect the current status in the document.

Response 3:

OCWR will revise the text of Section 1.6 Project Description – *Demonstration Open Windrow Pilot Composting Operation at the Olinda Alpha Landfill*, on page 5 to clarify, as shown below. Deleted text is shown in strikeout, and added text is underlined.

"The open windrow composting pilot facility at the Olinda Alpha Landfill, which is now inactive, is-was located on an approximately one-acre area in the equipment maintenance area. Material feedstocks (compostable materials) composted include source separated residential curbside green waste, commercial green waste, processed green waste and wood waste. The pilot project does did not have more than 60 tons (i.e., 92 cubic yards) of material on-site at any one time or process more than 250 tons of material per year. OCWR ereates created one windrow that is-was no more than 92 cubic yards of material on-site with the approximate dimensions of 82 feet long, 10 feet wide and 6 feet high. The feedstock is was placed on top of a crushed asphalt surface for all weather access and surrounded by an earthen berm to prevent storm water run-on and run-off. The windrow is-was periodically turned with a loader, skid steer, or similar equipment, up to three times per week, to quicken the decomposition of the feedstock into compost and to maintain temperatures greater than 131 degrees Fahrenheit during the pathogen reduction process. The heavy equipment is already in use at the landfill on a routine basis and is was made available for the pilot project. The initial compost processing phase lasts at least 22 days or until the pile has completed the pathogen reduction process. Afterwards, the compost material is cured for a period that lasts between 30-60 days for further stabilization of the compost product. Altogether, the composting process takes up to 100 days. The active composting process requires the use of water to hydrate the windrow keeping the feedstock moist without overwatering. Water for the pilot project is was provided by a water truck that is already in use at the landfill operation."

Comment 4:

Page 7 of the Initial Study states: A portion of the PGM that is already being received each day would simply be transferred to the Valencia Greenery.

Please clarify if PGM is still being received at Olinda Landfill. If not, please make appropriate revisions related to PGM use in the rest of the document and in the Draft Odor Impact Minimization Plan.

Response 4:

PGM was accepted at the landfill for use as Alternative Daily Cover (ADC), tarp framing, and erosion control prior to the implementation of SB 1383 and AB 1594 starting in 2020. OCWR continues to receive some PGM loads incoming that are charged at a waste rate and buried; these loads are no longer counted as exempt pursuant to SB 1383 and AB 1594.

This is as stated in the MND document, as referenced in Section 1.6 Project Description – Proposed Project (page 6): "Prior to 2020, the Olinda Alpha Landfill accepted approximately 746 TPD of PGM for beneficial reuse at the landfill, originating from incorporated cities in Orange County and the County unincorporated area. This material would be ground and screened at existing materials recovery facilities and composting operations, and then loaded into transfer trucks that carried approximately 20-ton payloads for delivery to the Olinda Alpha Landfill (i.e., approximately 38 two-way truck trips per day). Since 2020, any PGM or other green waste material coming to the landfill is counted as disposal, pursuant to AB 1594. Green waste material received is predominately from residential sources within Orange County. For the proposed Valencia Greenery, it is proposed that a maximum of 230 TPD of material be composted per day."

This is stated similarly throughout the document. The current incoming tonnage of PGM may be reduced from pre-2020 levels, however to account for this, in the transportation analysis, truck trips associated with erosion control were not reduced from the total trip generation to provide a conservative, worst-case estimate for project trip generation. Also note that the 230 TPD anticipated for the greenery operation is a portion of the total green waste that had been incoming to the landfill prior to implementation of SB 1383 and AB 1594 regulations.

Comment 5:

The facility will be developed in two phases: Phase I – Open Windrow Composting; and Phase II – CASP Composting.

Will Phase I and Phase II operate concurrently? Or will Phase I cease operation as it is temporary when Phase II is started, or will there be an overlap of operations? Will entire composting operation become a CASP operation? Please elaborate and make it clear.

Response 5:

The proposed project includes Phase I, which is a temporary condition that would last for approximately the first 5 to 6 months of project operation, and would involve open windrow composting, and Phase II, which would include covered aerated static pile (CASP) composting. Phase I open windrow composting will occur while Phase II CASP infrastructure is being constructed. Phase I and Phase II are not anticipated to operate concurrently although there may be a brief transition period. Upon completion of CASP construction, OCWR will transition into Phase II, which will include CASP composting.

This is as stated in Section 1.6 Project Description – Phase I – Open Windrow Composting of the MND (page 9): "Phase I is a temporary condition and anticipated to last for the first 5-6 months of the Valencia Greenery operation." It is estimated that the upon completion of construction of Phase I, Phase I will operate for approximately 6 months before starting on Phase II. This is similarly referenced throughout the document.

The environmental analyses included in the MND considers each Phase of operation individually as well as the temporary overlap between operation of Phase I and construction of Phase II.

Comment 6:

Page 9 of the Initial Study states: Five full-time employees will be needed to provide sufficient staffing for days off, vacations, etc.

Are number of employees specified here only for Phase I operation or for both Phase I and II operations?

Response 6:

The information provided is intended to cover both Phase I and Phase II operations. OCWR has staff available that are trained for both landfill and composting operations, and anticipates that up to 5 additional staff will be required to cover both Phase I and Phase II operations. The environmental analyses in the MND, including the transportation analysis, anticipated 5 new employees for both Phase I and Phase II operations, and this is referenced in the environmental analyses in the MND.

Nonetheless, OCWR will revise the text of Section 1.6 Project Description – Phase II CASP Composting, on page 10 to clarify that this also applies to Phase II, as shown below. Deleted text is shown in strikeout, and added text is underlined.

"The same heavy equipment used for open windrow composting would also be used to construct the compost piles for CASP composting, and the same number of employees anticipated for <u>Phase I as described above is also anticipated for Phase II</u>. The CASP composting system will use a mechanical cover winder to apply and remove the covers from the compost piles. The composting occurs in the aerated piles for a minimum of 8 weeks; the first 4 weeks (21-28 days) are the active composting phase, after which the curing phase occurs for a minimum of 4 weeks. It is anticipated that the CASP composting will use less water when compared to open windrow composting, and therefore will not use more than 35,967 gallons per day, less than what is anticipated for open windrow composting described above."

Comment 7:

Page 38 of the Initial Study states: All odor complaints received from potential receptors and/or regulators shall be recorded in the facility operational logbook and complaint log.

5

Although two odor complaint logs will be kept for the two separate permits (landfill and composting operations), how will odor complaints be differentiated between landfill and composting operations? Will a procedure be in place?

Response 7:

An Odor Impact Minimization Plan (OIMP) has been prepared for the Valencia Greenery Composting operation, included as Appendix E to the MND, which includes a Complaint Response Protocol. All measures and procedures outlined in the OIMP and Complaint Response Protocol will be followed for any odor complaints received. As outlined in the OIMP, the general procedure includes: all complaints are logged; complainant is contacted for details; regulators are notified as required; staff investigate the site for odor sources; BMPs are implemented as required to minimize odors; staff follows up with complainant. In addition, OCWR continues to implement an odor control and response program for any landfill complaints, which entails a similar protocol.

Due to the co-location of the landfill operation and the greenery operation on the same property, investigation of complaints will generally involve the inspection of both operations to determine potential odor source. Staff mobilized to respond to and investigate odor complaints will be trained to identify differences in detected odors to attempt to identify likely sources (composting vs landfilling). Typically landfill odors are distinct from odors that may occur at a composting operation. Understanding that complainants may not be able to differentiate odor types, information provided may lack specificity, and in the event of a complaint, staff will generally investigate both the landfill and composting operation to identify potentially sources as well as ensure that odor control Best Management Practices are in place for all operations.

Comment 8:

Page 52 of the Initial Study states: The proposed composting operation will generate leachate from the composting process which will be collected and reused in the composting operation.

Will the leachate be tested prior to reuse? Is this acceptable to the RWQCB?

Response 8:

Leachate generated from the compost will only have come in contact with compost materials and will be distinct from landfill leachate. Leachate and surface water runoff from the compost facility will be collected in an onsite detention basin, as described in the MND. All compost leachate will be kept on site and reused at the compost facility and will not be discharged (it will not leave the greenery facility nor comingle with landfill leachate or surface water runoff).

The Compost General Waste Discharge Requirement Order No. WQ 2020-0012-DWQ allows this activity according to Finding Item 23, and testing is not required prior to use:

"23. Wastewater refers to leachate or any other liquid flowing from, or on the working surface. That wastewater from the working surface may be conveyed to a detention pond. Wastewater may be reapplied to the compost piles as needed."

Comment 9:

Page 65 of the Initial Study states: Olinda Alpha Landfill that accepts approximately 6,850 tons of solid waste per day and approximately 5,175 tons of exempt wastes (i.e., processed green material for erosion control, asphalt and soil) per day.

Is processed green material still used for erosion control? If no, please revise the document accordingly.

Response 9:

As stated in Section 1.4 Existing Conditions and Environmental Setting of the MND (page 3): "The landfill also receives exempt wastes for beneficial reuse at the landfill which currently include asphalt and soil, and prior to 2020, also included processed green material (PGM). Prior to 2020, when new regulations on green waste management came into effect (as further described below), the landfill accepted approximately 746 TPD of PGM (based on 2019 data)."

OCWR will revise the text on page 65, as well as the same text on pages 25 and 51, as shown below to correctly align with the text as stated in Section 1.4. Deleted text is shown in strikeout and added text is underlined. Please also see response to comment 4.

"...Olinda Alpha Landfill that accepts approximately 6,850 tons of solid waste per day and approximately 5,175 tons of exempt wastes (i.e., processed green material for erosion control, asphalt and soil, and prior to 2020, processed green material for erosion control) per day based on 2019 data.

Comment 10:

Page 36 of the Initial Study and Page 3 of Appendix B (MMRP) states: (Air Quality-Odor Control PDF & OCM-8) states: For the open windrow composting operation in Phase I, the feedstock materials will be formed into elongated piles/open windrows, with dimensions not exceeding 12 feet in height, 20 feet in length and 100 feet long for composting with the addition of moisture as needed by the on-site water truck.

How about Phase II operation, not mentioned here or in Pages 4 and 5?

Response 10:

As stated in Section 1.6 Project Description (page 10), the dimensions of the covered aerated static piles (i.e., height, length, and width) will be 12 feet by 90 feet by 22 feet, with an additional 10 feet of the pile length reserved for the push wall and equipment. Pages 4 and 5 of the Project Description are introductory and cover the pilot project operations, and therefore do

not go into detail on the full scale CASP operation, but as mentioned above, this information is specified in the Phase II - CASP Composting section of the Project Description on page 10.

OCWR will revise the text of Air Quality-Odor Control PDF & OCM-8 on page 36, as well as in the MMRP, as shown below to include the dimensions of the CASP piles in addition to the open windrow piles, with information as stated in the project description. Deleted text is show in strikeout, and added text is underlined.

"(Air Quality-Odor Control PDF & OCM-8) For the open windrow composting operation in Phase I, the feedstock materials will be formed into elongated piles/open windrows, with dimensions not exceeding 12 feet in height, 20 feet in length and 100 feet long for composting with the addition of moisture as needed by the on-site water truck. For the CASP operation in Phase II, the pile dimensions will be 12 feet in height, 90 feet in length, and 22 feet in width, with an additional 10 feet of the pile length reserved for the push wall and equipment. Newly constructed compost windrows in the Phase I open windrow process will initially be covered with at least 6 inches of finished compost within 24 hours of formation as required by SCAQMD Rule 1133.3. For the first 15 days after initial windrow formation, within six hours before turning, water will be applied as necessary to ensure the pile meets the wetness criteria described in Rule 1133.3. During this period, the temperature of each compost pile will be taken every day."

Comment 11:

Section 5.7 of the Draft OIMP states: Feedstock with greater than 50% moisture content will not be accepted.

Please elaborate how will this be determined in the field and rejected?

Response 11:

As described in Section 5.1 – Feedstock Characteristics and Management (page 5) of the Draft OIMP (Appendix E), "Feedstock material shall be inspected visually for particle size, moisture content, and contamination level prior to its acceptance." Page 11 of the Project Description in the MND also includes a description of the Load Check Program for the greenery operation.

OCWR staff includes waste inspectors, which implement the Load Check Program. Waste inspectors are familiar with visually inspecting incoming loads at the landfill for various parameters, including liquid wastes and high moisture content wastes, which are not accepted. Similarly, at the Valencia Greenery, as feedstock loads are incoming, they will be visually inspected in the field by waste inspectors prior to off-loading and will be rejected if determined to be too wet.

RL-2

Please let me know if you would like to discuss any of the responses above. OCWR looks forward to working with the LEA during the permitting phase of this project. I can be reached at (714) 834-4107 or by email at <u>aimee.halligan@ocwr.ocgov.com</u>.

Sincerely,

Aine Halligan

Aimee Halligan CEQA Manager

SCAQMD Comments & Response to Comments CL-3/RL-3 AQMD (909) 396-2000 • www.aqmd.gov

March 22, 2022

<u>SENT VIA E-MAIL:</u> <u>aimee.halligan@ocwr.ocgov.com</u> Aimee Halligan, CEQA Manager Orange County Waste & Recycling 601 North Ross Street, 5th Floor Santa Ana, California 92701

CL-3

<u>Mitigated Negative Declaration (MND) for the Proposed</u> <u>Valencia Greenery Composting Operations at the Olinda Alpha Landfill Project</u> <u>(Proposed Project) (SCH No.: 2022020473)</u>

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Orange County Waste & Recycling (OCWR) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the MND include baseline conditions and operational air quality impacts and South Coast AQMD permitting requirements that OCWR should include in the Final MND.

Based on the MND, the Olinda Alpha Landfill is an existing Class III landfill that only accepts municipal solid waste for disposal, and no hazardous or liquid waste can be accepted¹. Within the landfill, OCWR currently operates a pilot open windrow composting project and is in the approval process of implementing a Covered Aerate Static Pile (CASP) composting pilot project². The Proposed Project consists of implementation of a full-scale, two-phase composting operation within the Olinda Alpha Landfill to assist the cities in Orange County as well as County unincorporated areas in meeting the Senate Bill 1383's requirements for the diversion and recycling of organic waste materials. During operations, the Proposed Project is expected to receive 230 tons per day (tpd) of compostable organic waste³. The Proposed Project is located at 1942 Valencia Avenue, Brea, California 92823.

The Proposed Project will be constructed in two phases. Phase 1 will include construction of composting components, including a composting deck, a lined stormwater pond, and an expansion of the existing water tanks⁴. Phase I will operate for six months prior to Phase II construction beginning⁵. During Phase II, components of the CASP system will be constructed and installed, including piping and solar panels⁶. During operations, the Proposed Project will

- ⁵ Ibid.
- ⁶ Ibid.

¹ MND. Section 1.4. Page 3.

² MND. Section 1.6. Pages 4 to 10.

³ *Ibid.* Page 4.

⁴ *Ibid.* Pages 4 to 10.

CL-3

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utilize both open windrow and CASP composting methods⁷ and would generate 12 net new, twoway truck trips per day⁸.

Based on a review of the MND and supporting technical documents, South Coast AQMD staff has two main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

- 1. <u>Baseline Conditions and Operational Air Quality Impacts Analysis</u>: The MND explains that, when compared to the existing setting, the Proposed Project will not result in a change to green waste composting emissions. However, in the MND, OCWR does not quantify baseline conditions from the existing pilot composting operations. These operations also process smaller amounts than is expected by the Proposed Project. Further, the landfill currently accepts 746 tons per day (tpd) of processed green material (PGM) to be used as alternate daily cover, and 230 tpd will be diverted to the Proposed Project during operation. However, there is no qualitative discussion or quantitative comparison between baseline emissions from landfilling 746 tpd of PGM versus emissions from composting 230 tpd of PGM during Project operations. Without additional information or quantification of emissions, there is no substantial evidence in the record to support the statement in the MND that there is no change in emissions under the Proposed Project. South Coast AQMD staff recommends OCWR revise the operational air quality impacts to include baseline emissions and compare baseline emissions to the Proposed Project's operational emissions in the Final MND.
- 2. <u>South Coast AQMD Permitting Requirements</u>: In addition to South Coast AQMD Rules 402, 403, and 1133.3 that were discussed in the MND, the Proposed project will be subject to additional permitting requirements that should be discussed in the Final MND.

South Coast AQMD staff is available to work with OCWR to address any air quality questions that may arise from this comment letter. Please feel free to contact Alina Mullins, Air Quality Specialist, at <u>amullins@aqmd.gov</u>, if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun Program Supervisor, CEQA IGR Planning, Rule Development & Area Sources

Attachment MM/LS:AM ORC220217-14 Control Number

⁷ MND. Section 1.6. Pages 6 to 10.

⁸ MND. Section 2.8 Page 50.

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ATTACHMENT

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment in the MND

In the Air Quality Analysis Section of the MND, OCWR quantified the Proposed Project's maximum daily construction emissions. Based on the analysis, OCWR found that regional and localized construction activities would not exceed South Coast AQMD's regional and localized CEQA air quality significance thresholds for construction⁹. OCWR also quantified the Proposed Project's maximum daily operational emissions from implementation of both Phase I and Phase II. Based on this analysis, OCWR found that the Proposed Project would not exceed South Coast AQMD's regional and localized CEQA air quality significance thresholds for operation¹⁰. However, it did not appear that emissions from existing or future composting operations were quantified in the operational air quality analysis.

Although OCWR found that the Proposed Project would not result in significant air quality impacts during construction or operation, OCWR has committed to implementing 28 Project Design Features and Operational Control Measures to further reduce the Proposed Project's impacts to air quality. These measures are focused on both fugitive dust control during construction and odor control during operation¹¹.

South Coast AQMD staff's detailed comments on the MND are provided as follows.

1. <u>Baseline Conditions and Operational Air Quality Impact Analysis</u>

In the MND, OCWR quantified operational emissions from the operation of the following sources: mobile, energy, area, off-road equipment, and stationary source equipment. Additionally, OCWR explains that "[c]ompared to existing conditions, the proposed project would result in no change to the green waste compost emissions [...]"¹². Although there are two existing pilot compositing projects onsite, the MND only provides general information on how much processed green material (PGM) is currently being composted by these pilot projects. The amount of PGM composted by each does not exceed more than 250 tons of material per year (tpy), but no emission estimates from these composting projects are provided in the MND^{13} . Therefore, specific baseline composting operations, including emission levels from criteria pollutants common from composting operations such as VOCs and PM, are unknown and how compositing operations during the Proposed Project will compare to existing conditions is also unknown. As such, the statement that "result in no change to the green waste compost emissions"¹⁴ is not supported with substantial evidence. Additionally, during the full-scale composting operations under the Proposed Project, Phases I and II will compost up to 94 tpd and 230 tpd of PGM, respectively¹⁵, which is more than the estimated 250 tpy that the pilot composting projects process currently. As such, it is likely that the Proposed Project may have more emissions from composting than under baseline composting conditions.

⁹ MND. Section 2.3. Pages 27 to 29.

¹⁰ *Ibid.* Pages 30 to 32.

¹¹ *Ibid.* Pages 34 to 40.

¹² MND. Section 2.3. Page 30.

¹³ MND. Section 1.6. Pages 5 to 6.

¹⁴ Ibid.

¹⁵ MND. Section 1.6. Pages 7 to 9.

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Further, the landfill has historically received 746 tpd of PGM as alternate daily cover¹⁶, and 230 tpd of that PGM will now be transferred to the Proposed Project for composting. However, there is no additional information as substantial evidence within the MND that qualitatively explains or quantitively compares how the Proposed Project's estimated composting emissions from 230 tpd of PGM will result in no net change to emissions when compared to existing landfilling emissions from the 746 tpd of PGM. If existing landfilling of the PGM results in greater emissions than anticipated from the Proposed Project's composting operations, this information is not provided or explained further within the MND. Therefore, South Coast AQMD staff recommends that OCWR revise the air quality analysis to include baseline emission calculations that can be compared to the Proposed Project's operational composting emissions. Baseline emissions should consider existing composting operations and landfilling of PGM. The change in emissions between baseline and Proposed Project can be compared to South Coast AQMD's regional air quality CEOA significance thresholds for operation to determine the level of significance, which can be used as substantial evidence to support the operational air quality impact finding in the Final MND. Alternatively, OCWR may qualitatively explain why the existing emissions from the existing composting projects and landfilling of PGM are greater than emissions anticipated from the Proposed Project's composting operations as substantial evidence to support the finding that there will be no change in emissions from the Proposed Project.

2. South Coast AQMD Permitting Requirements

South Coast AQMD is the CEQA Responsible Agency for the Proposed Project. In addition to the discussion of South Coast AQMD Rules 403, 1133, and 1133.3, the Proposed Project will be subject to the requirements of the following South Coast AQMD Rules and Regulations, which should be discussed in the Final MND to demonstrate that the Proposed Project will comply with them. Information on each of the rules and regulations is available on the South Coast AQMD's website at: <u>https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book</u>.

- Rule 201 Permit to Construct
- Rule 203 Permit to Operate
- Rule 401 Visible Emissions
- Rule 402 Nuisance
- Rule 431.2 Sulfur Content of Liquid Fuels
- Rule 1133.1 Chipping and Grading Activities
- Rule 1150 Excavation of Landfill Sites (for example, excavation work associated with preparation and/or construction of the Proposed Project may need a Rule 1150 Landfill Excavation Management Plan)
- Regulation XIII New Source Review
- Rule 1401 New Source Review of Toxic Air Contaminants
- Rule 1470 Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines
- Regulation XXX Title V Permits

¹⁶ MND. Section 1.5. Page 4.

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The Proposed Project will be required to submit complete and timely permit applications to South Coast AQMD for the following equipment:

- Applications for Permit to Construct and Permit to Operate will be required for screeners used to screen finished compost or other materials.
- Applications for Permit to Construct and Permit to Operate will be required for chipping and griding equipment used to chip/grind feedstock or other materials.
- Applications for Permit to Construct and Permit to Operate will be required for aerated static pile system and any associated air pollution control system (e.g., biofilter), if present.
- Applications for Permit to Construct and Permit to Operate will be required for engines powering the screeners, chippers, grinders, or other equipment if the engines are rated above 50 brake horsepower (bhp) and are not used to drive locomotion of the screener, chipper, grinder, or other equipment.
- Applications for Permit to Construct and Permit to Operate will be required for engines providing emergency electrical power if the engines are rated above 50 bhp.

South Coast AQMD's Engineering and Permitting staff should be consulted in advance to determine whether or not any additional permits will be needed prior to start of the construction or operation of the Proposed Project. It is important that impacts from the permits be fully and adequately evaluated and disclosed as required under CEQA Guidelines Section 15096(b). The assumptions used in the air quality analysis in the Final MND will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology¹⁷ is being used by South Coast AQMD for determining operational health impacts for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, OCWR shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When OCWR's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

¹⁷ Office of Environmental Health Hazard Assessment. "Notice of Adoption of Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015". Accessed at: <u>https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0</u>.



www.oclandfills.com Telephone: (714) 834-4000 Fax: (714) 834-4183

(Letter Sent Via Email)

April 13, 2022

Lijin Sun, J.D., Program Supervisor, CEQA IGR South Coast Air Quality Management District Planning, Rule Development & Area Sources 21865 Copley Drive Diamond Bar, CA 91765-4178

Subject: OC Waste & Recycling Responses to SCAQMD Comments on MND for Proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill (SCH No. 2022020473)

Dear Lijin Sun:

Thank you for the South Coast Air Quality Management District's (SCAQMD) comment letter regarding the Mitigated Negative Declaration (MND) for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill. The County of Orange, OC Waste & Recycling department (OCWR) appreciates the SCAQMD's engagement with this project. OCWR has the following responses to SCAQMD's comment letter dated March 22, 2022 regarding the Mitigated Negative Declaration (MND) for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill.

Comment 1:

Baseline Conditions and Operational Air Quality Impact Analysis

The MND explains that, when compared to the existing setting, the Proposed Project will not result in a change to green waste composting emissions. However, in the MND, OCWR does not quantify baseline conditions from the existing pilot composting operations. These operations also process smaller amounts than is expected by the Proposed Project. Further, the landfill currently accepts 746 tons per day (tpd) of processed green material (PGM) to be used as alternate daily cover, and 230 tpd will be diverted to the Proposed Project during operation. However, there is no qualitative discussion or quantitative comparison between baseline emissions from landfilling 746 tpd of PGM versus emissions from composting 230 tpd of PGM during Project operations. Without additional information or quantification of emissions, there is no substantial evidence in the record to support the statement in the MND that there is no change in emissions under the Proposed Project. South Coast AQMD staff recommends OCWR revise the operational air quality impacts to include baseline emissions and compare baseline emissions to the Proposed Project's operational emissions in the Final MND.

In the MND, OCWR quantified operational emissions from the operation of the following sources: mobile, energy, area, off-road equipment, and stationary source equipment.

Additionally, OCWR explains that "[c]ompared to existing conditions, the proposed project would result in no change to the green waste compost emissions [...]". Although there are two existing pilot compositing projects onsite, the MND only provides general information on how much processed green material (PGM) is currently being composted by these pilot projects. The amount of PGM composted by each does not exceed more than 250 tons of material per year (tpy), but no emission estimates from these composting projects are provided in the MND. Therefore, specific baseline composting operations, including emission levels from criteria pollutants common from composting operations such as VOCs and PM, are unknown and how compositing operations during the Proposed Project will compare to existing conditions is also unknown. As such, the statement that "result in no change to the green waste compost emissions" is not supported with substantial evidence. Additionally, during the full-scale composting operations under the Proposed Project, Phases I and II will compost up to 94 tpd and 230 tpd of PGM, respectively, which is more than the estimated 250 tpy that the pilot composting projects process currently. As such, it is likely that the Proposed Project may have more emissions from composting than under baseline composting conditions.

Further, the landfill has historically received 746 tpd of PGM as alternate daily cover, and 230 tpd of that PGM will now be transferred to the Proposed Project for composting. However, there is no additional information as substantial evidence within the MND that qualitatively explains or quantitively compares how the Proposed Project's estimated composting emissions from 230 tpd of PGM will result in no net change to emissions when compared to existing landfilling emissions from the 746 tpd of PGM. If existing landfilling of the PGM results in greater emissions than anticipated from the Proposed Project's composting operations, this information is not provided or explained further within the MND. Therefore, South Coast AQMD staff recommends that OCWR revise the air quality analysis to include baseline emission calculations that can be compared to the Proposed Project's operational composting emissions. Baseline emissions should consider existing composting operations and landfilling of PGM. The change in emissions between baseline and Proposed Project can be compared to South Coast AQMD's regional air quality CEQA significance thresholds for operation to determine the level of significance, which can be used as substantial evidence to support the operational air quality impact finding in the Final MND. Alternatively, OCWR may qualitatively explain why the existing emissions from the existing composting projects and landfilling of PGM are greater than emissions anticipated from the Proposed Project's composting operations as substantial evidence to support the finding that there will be no change in emissions from the Proposed Project.

Response 1:

Materials that have been composted as part of the existing pilot composting operations at the Olinda Alpha Landfill is an existing condition that is not part of the proposed project. The proposed project includes Phase I, which is a temporary condition that would last for the first 5 to 6 months of project operation, and would involve open windrow composting, and Phase II, which would include covered aerated static pile (CASP) composting. Phase I and Phase II will not operate concurrently, and a maximum of 230 tpd will be accepted at the composting operation. In addition, at the time of writing the draft MND, OCWR was planning to begin a CASP pilot project, however, has since determined not to proceed with that pilot project. The open windrow pilot project has also ceased to operate at this time.

Solid waste materials that are currently decomposing inside the Olinda Alpha Landfill is an existing condition that is not part of the proposed project. The proposed project is for open windrow and CASP composting only, that would occur on top of the landfill. Emissions associated with the decomposition of green and organic wastes within the landfill is not comparable to emissions from open windrow or CASP composting, since the organic waste inside the landfill is mixed with many other waste types.

As identified in the IS/MND, prior to the implementation of SB 1383 and AB 1594, the landfill accepted up to 746 tons per day (tpd) of processed green material (PGM) to be used as alternative daily cover (ADC). In order to establish a relative baseline in the preparation of the Air Quality analysis, LSA assumed that emissions associated with the use of processed green material as alternative daily cover (ADC) at the landfill would be comparable to emissions generated by open windrow and CASP composting, since both are aerobic processes that use green wastes.

In addition, due to the recent State organic waste recycling mandates (SB 1383 and AB 1594), at least 50 percent of the organic waste generated by the incorporated cities in Orange County must now be diverted from landfilling by 2020 and 75 percent by 2025. Since OC Waste & Recycling will only be able to accept a small portion of the green and organic waste volume at proposed composting operations at OC Waste & Recycling's Olinda Alpha, FRB and Prima Deshecha Landfills, a significant percentage of this total daily organic waste volume, estimated at over 2,000 TPD, will be leaving Orange County and will be transported to more distant composting operations and landfills located in the South Coast Air Basin. The organic waste generates the same amount of emissions from decomposition regardless of where the organic waste is transported to, but by having composting operations that are located more closely to the cities where the organic waste is generated in Orange County, this will result in an air pollutants emissions reduction overall for the South Coast Air Basin because of shorter truck trips and lower mobile source emissions. The approximate 230 TPD of organic waste that will be received at the Valencia Greenery composting operation is generated within the local cities that utilize the Olinda Alpha Landfill (i.e., Buena Park, Fullerton, La Habra, Brea, Placentia, Yorba Linda, portions of Anaheim, Orange, Villa Park, Stanton, Garden Grove, Seal Beach, Cypress, La Palma, Los Alamitos, and north County unincorporated areas), thereby resulting in a net air pollutants emissions reduction for the South Coast Air Basin, when compared to using more distant composting operations and landfills located outside of Orange County that would result in much longer trips and higher mobile source emissions.

Comment 2:

South Coast AQMD Permitting Requirements

South Coast AQMD is the CEQA Responsible Agency for the Proposed Project. In addition to the discussion of South Coast AQMD Rules 403, 1133, and 1133.3, the Proposed Project will be subject to the requirements of the following South Coast AQMD Rules and Regulations, which should be discussed in the Final MND to demonstrate that the Proposed Project will comply with them. Information on each of the rules and regulations is available on the South Coast AQMD's website at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book.

- Rule 201 Permit to Construct
- Rule 203 Permit to Operate

- Rule 401 Visible Emissions
- Rule 402 Nuisance
- Rule 431.2 Sulfur Content of Liquid Fuels
- Rule 1133.1 Chipping and Grading Activities
- Rule 1150 Excavation of Landfill Sites (for example, excavation work associated with preparation and/or construction of the Proposed Project may need a Rule 1150 Landfill Excavation Management Plan)
- Regulation XIII New Source Review
- Rule 1401 New Source Review of Toxic Air Contaminants
- Rule 1470 Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines
- Regulation XXX Title V Permits

The Proposed Project will be required to submit complete and timely permit applications to South Coast AQMD for the following equipment:

- Applications for Permit to Construct and Permit to Operate will be required for screeners used to screen finished compost or other materials.
- Applications for Permit to Construct and Permit to Operate will be required for chipping and grinding equipment used to chip/grind feedstock or other materials.
- Applications for Permit to Construct and Permit to Operate will be required for aerated static pile system and any associated air pollution control system (e.g., biofilter), if present.
- Applications for Permit to Construct and Permit to Operate will be required for engines powering the screeners, chippers, grinders, or other equipment if the engines are rated above 50 brake horsepower (bhp) and are not used to drive locomotion of the screener, chipper, grinder, or other equipment.
- Applications for Permit to Construct and Permit to Operate will be required for engines providing emergency electrical power if the engines are rated above 50 bhp.

South Coast AQMD's Engineering and Permitting staff should be consulted in advance to determine whether or not any additional permits will be needed prior to start of the construction or operation of the Proposed Project. It is important that impacts from the permits be fully and adequately evaluated and disclosed as required under CEQA Guidelines Section 15096(b). The assumptions used in the air quality analysis in the Final MND will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health impacts for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

RL-3

Response 2:

OCWR currently operates two other full-scale composting operations: the Bee Canyon Greenery at the Frank R. Bowerman Landfill in Irvine, and the Capistrano Greenery at the Prima Deshecha Landfill in San Juan Capistrano. For these two greenery operations, OCWR spoke to several staff members at SCAQMD to determine which SCAQMD Rules and Regulations, in addition to Rules 402, 403 and 1133.3, would govern the proposed open windrow green waste composting operation. Through consultation with SCAQMD staff it was determined that per SCAQMD Rule 301, a permit will be required for the motor and dust emissions from the track mounted screener. It has also been determined that a permit will be required for the conveyor planned for use at Valencia Greenery. OCWR will continue to consult and work with SCAQMD staff during the permitting phase of the project to ensure that OC Waste & Recycling complies with all required SCAQMD Rules, Regulations and Permits that will be required for the proposed composting operation.

Please let me know if you would like to discuss any of the responses above. I can be reached at (714) 834-4107 or by email at <u>aimee.halligan@ocwr.ocgov.com</u>.

Sincerely,

année Halligan

Aimee Halligan CEQA Manager

City of Brea Comments & Responses to Comments CL-4/RL-4



March 23, 2022

Francine Bangert Public Communications Manager Orange County Waste & Recycling 601 North Ross Street, 5th Floor Santa Ana, CA 92701

RE: CITY OF BREA COMMENTS TO MITIGATE NEGATIVE DECLARATION (MND) FOR THE PROPOSED VALENCIA GREENERY COMPOSTING OPERATION AT OLINDA ALPHA LANDFILL

Dear Mrs. Bangert,

Thank you for providing the City of Brea the opportunity to review the MND Draft for the proposed Valencia Greenery Composting Operation at Olinda Alpha Landfill (Project). The Public Works and Community Development Departments have reviewed the proposed Project MND Draft / Initial Study No. 710 and have the following input:

- The proposed Project must incorporate a line of sight analysis to verify that the proposed Project site and associated operations are not visible from the Olinda Ranch and Olinda Village communities located to the south of the existing Olinda Alpha Landfill.
- The City is very concerned with the mitigation measures proposed to Aesthetics (AS-1/AS-2) and believes these mitigation measures fail to reduce these impacts to a less than significant level. The Project must incorporate design features, operational standards, and additional steps to ensure Brea residents' existing aesthetic values and hillside views are not obstructed by this operation, both day and night.
- The Project indicated Air Quality and Dust Control measures consistent with SCAQMD's Rule 403. These control measures are standard and typically are focused on grading and stockpiling operations. However, additional attention to specific dust control measures for this canyon region of the County must be considered. In addition, stabilizers should be explicitly identified in the MND and evaluated by the Project's Water Quality Management program.
- The MND specifies that the proposed Project will require approximately 54,000 gallons per day for the Phase I operation and up to 35,967 gallons per day for the Phase II operation.

City Council	Cecilia Hupp	Glenn Parker	Christine Marick	Marty Simonoff	Steve Vargas
	Mayor	Mayor Pro Tem	Council Member	Council Member	Council Member

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This upcoming water usage is not included in the future projects of the current City of Brea Water Master Plan, dated May 2021. A water study must be prepared by Orange County Waste & Recycling to identify associated City water supply and infrastructure impacts from the proposed Project.

• The City of Brea requests information on the community outreach conducted by Orange County Waste & Recycling, specifically targeting Brea residents within the general vicinity.

Again, thank you for providing the City of Brea with the opportunity to comment on the proposed Project. The City of Brea reserves the right for future commenting on this Project and seeks additional analysis, specifically to the items aforementioned in this letter. The City welcomes further research in the form of an Environmental Impact Report (EIR).

We look forward to partnering with Orange County Waste & Recycling on this Project. Should you have any questions regarding this letter, please contact Community Development Director Jason Killebrew at (714) 990-7758.

Sincerely,

Bill Gallardo City Manager

Cc: City of Brea City Council Chris Emeterio, Assistant City Manager Michael Ho, P.E., Public Works Director Jason Killebrew, Community Development Director



www.oclandfills.com Telephone: (714) 834-4000 Fax: (714) 834-4183

(Letter Sent Via Email)

April 13, 2022

Jason Killebrew City of Brea 1 Civic Center Circle Brea, CA 92821-5732

Subject: OC Waste & Recycling Responses to City of Brea Comments on MND for Valencia Greenery Composting Operation – Orange County (SCH No. 2022020473)

Dear Mr. Killebrew:

Thank you for the City of Brea's comment letter regarding the Mitigated Negative Declaration (MND) for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill. The County of Orange, OC Waste & Recycling department (OCWR) appreciates the City of Brea's engagement with this project at the dialogue between OCWR and the City of Brea regarding this project throughout its development. OCWR has the following responses to your comment letter dated March 23, 2022 regarding the MND for the proposed Valencia Greenery Composting Operation at the Olinda Alpha Landfill.

Comment 1:

The proposed Project must incorporate a line of sight analysis to verify that the proposed Project site and associated operations are not visible from the Olinda Ranch and Olinda Village communities located to the south of the existing Olinda Alpha Landfill.

Response 1:

The proposed project will be located at the far northeast corner within the existing landfill property. The proposed project location is the furthest possible location within the landfill property from nearby residences (approximately 1.2 miles). The proposed improvements would not be built higher than existing landfill facilities.

As outlined in the MND, due to distance, topography, and the relatively low heights of the proposed improvements, the proposed project site is not anticipated to be visible from or substantially reduce public views of nearby ridgelines. Views would remain similar to existing views, and the proposed project would be consistent with the visual character of the existing landfill. Although the proposed fire water tanks would be higher than other components of the proposed project on the site, the fire water tanks are not expected to be visible to the public as they would be located behind existing communications towers.

The proposed three additional operational water tanks would be located on the western edge of the upper deck of the landfill by the existing operational water tanks, approximately 0.7 mi southwest of the proposed project. The proposed operational water tanks would be similar in height and style as the existing operational water tanks, and would be no greater than 31 ft in height and 10 ft wide. Views would remain similar to existing views, and the proposed project would be consistent with the visual character of the existing landfill.

Given that the project and water tanks are not anticipated to be visible given the existing topographical setting, a line of sight analysis was determined not to be necessary. Nevertheless, OCWR is cognizant of the City's concerns, and in the interest of addressing those concerns, please refer to Attachment A to this letter, which includes line of sight photographs which document that the proposed project improvements including additional water tanks will not be visible from the surrounding communities in Brea, will not substantially obstruct public views, and will not result in a substantial change from the existing visual character of the landfill setting.

Although the fire water tanks and the operational water tanks are not anticipated to be visible from nearby communities or obstruct or alter existing ridgeline views, Mitigation Measure AS-1 identified in the MND specifies that the proposed fire water tanks would be painted tan or a similar color to better blend in with adjacent topography. With that mitigation measure included, the already less than significant aesthetic impacts will be even further reduced, and additional mitigation measures are not required.

Comment 2:

The City is very concerned with the mitigation measures proposed to Aesthetics (AS-1/AS-2) and believes these mitigation measures fail to reduce these impacts to a less than significant level. The Project must incorporate design features, operational standards, and additional steps to ensure Brea residents' existing aesthetic values and hillside views are not obstructed by this operation, both day and night.

Response 2:

Please refer to response to comment 1. In addition, as described in the MND, sources of night light at the landfill and subsequently at the composting operation are and will be minimal because the operations will only occur during the day from 6:00 am to 4:00 pm, Monday through Saturday, and nighttime lighting is limited to security lighting for access roads, parking areas, and on-site buildings. Any construction-related illumination during evening and nighttime hours would be shielded to the extent feasible and would consist of the minimum required for safety and security purposes, and would only occur for the duration required for the temporary construction process. While OCWR is sensitive to the City's concerns, for all of the reasons described above, the aesthetic impacts for the project are already less than significant, and those less than significant impacts are even further reduced by the inclusion of the two mitigation measures that the City mentions (AS-1/AS-2).

Comment 3:

The Project indicated Air Quality and Dust Control measures consistent with SCAQMD's Rule 403. These control measures are standard and typically are focused on grading and stockpiling operations. However, additional attention to specific dust control measures for this canyon region of the County must be considered. In addition. stabilizers should be explicitly identified in the MND and evaluated by the Project's Water Quality Management program.

Response 3:

The MND identifies compliance with the South Coast Air Quality Management District (SCAQMD) Fugitive Dust Rules during project construction as well as during operation as part of the project. In addition to compliance with SCAQMD rules, the MND also identifies various Dust Control Project Design Features and Operational Control Measures (PDF & OCM) that will be implemented to ensure that dust is minimized through the course of facility operation. These PDF & OCM are copied below for your reference. With the incorporation of these PDF & OCM, there will be no significant impacts associated with fugitive dust and additional mitigation measures are not required. In addition, please note that Phase II of the project will utilize Covered Aerated Static Pile (CASP) technology for composting. In this type of operation, compost piles will be covered during processing, which will further reduce the potential for dust. It is not anticipated that stabilizers will be required during the operation of the composting facility to minimize dust, in part because of the use of CASP technology. To stabilize soil, in general hydroseed slurry with the inclusion of tackifier material has been used in construction and in previously graded areas at the landfill to prevent erosion and dust. If soil stabilization becomes necessary in compost facility construction or operations, OCWR will likely utilize hydroseed, or identify similarly effective products that are evaluated with relation to applicable water quality management plans and regulation by the Regional Water Quality Control Board (RWQCB) to stabilize the soil and control dust.

In addition, OCWR operates three existing landfills in Orange County, including the Olinda Alpha Landfill in Brea, the Frank R. Bowerman Landfill in Irvine (FRB), and the Prima Deshecha Landfill in San Juan Capistrano (Prima), all of which are located in canyon areas within the County. Full-scale composting operations are already active at both the FRB & Prima Landfills, and prior to the implementation of SB 1383 and AB 1594, each landfill received quantities of PGM daily for use as ADC, erosion control, or tarp framing. Each landfill and composting operation is subject to compliance with all permit conditions imposed by regulatory agencies, including SCAQMD. The relevant permit conditions include specific procedures for controlling, in addition to other factors, dust. The SCAQMD regulates landfill operations related to LFG emissions, subsurface gas migration and fugitive dust control for Orange County landfills. Dust control measures continue to be implemented in accordance with permits and mitigation measures set forth in each site's environmental documents. Based on experience at each landfill site and existing compost facility, all implemented dust control measures have been effective in controlling fugitive dust in canyon regions of the County. Similar measures would be used at the proposed project site to control dust. Due to its similarity to other landfill sites and composting operations, the dust control measures implemented at the other landfill sites and composting operations are expected to be similarly effective for the proposed project.

RL-4

(Air Quality-Dust Control PDF & OCM-1) Compost windrows will not be turned during high wind episodes exceeding wind speeds of 30 miles per hour in order to manage dust particulates.

(Air Quality-Dust Control PDF & OCM-2) The compost operation entryway and often-traveled paths will be overlain with crushed rock or asphalt to prevent tracking of onsite materials and dust off-site.

(Air Quality-Dust Control PDF & OCM-3) Unpaved roads shall be watered as necessary to minimize visible dust. Alternatively, roads may be paved.

(Air Quality-Dust Control PDF & OCM-4) The composting operation will implement SCAQMD's Rule 403, requiring control of fugitive dust during construction and operations via best-available control measures. These measures include the following:

- Apply non-toxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (i.e., previously graded areas inactive for 10 days or more).
- Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (ft.) (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Pave construction access roads at least 100 ft. (30 meters) onto the site from the main road.
- Reduce traffic speeds on all unpaved roads to 15 mph or less.

Comment 4:

The MND specifies that the proposed Project will require approximately 54,000 gallons per day for the Phase I operation and up to 35,967 gallons per day for the Phase II operation.

This upcoming water usage is not included in the future projects in the current City of Brea Water Master Plan, dated May 2021. A water study must be prepared by Orange County Waste & Recycling to identify associated City water supply and infrastructure impacts from the proposed Project.

Response 4:

The MND indicates that on average, the current landfill operation utilizes approximately 115,000 gallons per day (gpd) and that OCWR anticipates using up to an additional 54,000 gpd for Phase I and up to 35,967 gpd for Phase II operations of the composting facility. Note that the estimations for the compost operation are conservative maximums and represent the highest amount of water that OCWR reasonably anticipates the project using in a single day. Actual daily use will fluctuate and may be considerably less depending on operational status and process, for instance, how many piles on site at a given time that require turning and watering.

The City of Brea's water supply has accommodated regular fluctuations in usage at the landfill over time. The MND conservatively estimated an average existing daily usage of 115,000 gpd for landfill operations; this estimate was based on an average for high use periods. In response to this comment, OCWR analyzed water consumption data going back to Fiscal Year (FY) 2012-2013 through the most recently completed FY 2020-2021 to better identify how water consumption has varied over time at the landfill. Based on this data, average daily usage fluctuates throughout the year, from a low of approximately 8,000 gpd (December 2019) to a high of up to approximately 246,000 gpd (July 2018), and is generally influenced by season. For example, water usage tends to increase during the dry summer months, when dust is a bigger potential issue that needs to be controlled. In contrast, during rainy seasons of wet years, water consumption may be much lower, because OCWR is able to reuse water from on-site desilting basins that collect stormwater on-site. In addition, other projects and construction over the operational span of the landfill have also resulted in periodic increased water supply demand. For example, water usage during the course of partial final closure construction activities at a portion of the site in 2018 resulted in significantly increased average daily water usages at the landfill (see referenced quantity for July 2018).

As mentioned above, in response to this comment, OCWR analyzed additional water consumption data from FY 2012-2013 through FY 2020-2021, and recalculated the average daily water usage over this period using all available data and based on landfill operational days (the landfill is closed on Sundays and six major holidays each year). Based on this data the average water consumption for landfill use is closer to 81,000 gpd, with a year-to-date average in FY 2021-2022 of approximately 82,000 gpd. Given the fluctuations in water usage that have occurred and will continue to occur over time, the anticipated usage for the compost operation falls within the general range of daily water consumption amounts that have been previously accommodated at the landfill on a regular basis. Adding 35,967 gpd to 54,000 gpd for the composting operation to the average landfill water usage results in a total combined water usage estimate of approximately 117,000 to 189,000 gpd, which falls within the existing range of daily water currently used daily at the landfill and compost operation.

The existing water line and infrastructure serving the landfill property currently provides water to serve both OCWR and Energy Developments Limited (EDL), which operates the Landfill Gas (LFG) to energy plant located at the Olinda Alpha Landfill. The waterline at the site fills on sitestorage tanks, which is then distributed to each operation via two separate meters – one for OCWR and one for EDL. On average, EDL has used approximately 225,000 gpd in its operations, which occur 365 days per year. In general EDL uses approximately 75% of the water incoming to the site and the remaining 25% is used for landfill operations. When considering the total amount of water currently being delivered to the site via the existing waterline to serve both operations, the quantity anticipated for use by the composting operation amounts to an approximately 18% increase in total water usage for Phase I operation will be temporary and is anticipated to occur for approximately 5-6 months before Phase II operations begin. The anticipated increase in water usage associated with the composting operations will fall within the general range of daily water consumption that have been previously accommodated by the City's water supply and infrastructure at the landfill, and the relatively low percentage increase in water delivered to the site is not anticipated to over-strain the City's existing infrastructure. In addition, OCWR has designed the compost facility to work with the existing flow rate provided by the existing water line at the Olinda Alpha landfill, meaning that the proposed project will not require a higher capacity line or a new waterline that would accommodate an increased flow rate. The existing flow rate will sufficiently accommodate the proposed composting operation by filling additional water tanks and providing additional storage capacity on-site at the landfill for use in composting operations. As such, the existing water infrastructure is anticipated to be adequate to continue providing water to the landfill and composting operations.

It is noteworthy that EDL is also in the process of developing a wastewater treatment and reuse facility. EDL is in the permitting phase and working with OCWR and various regulatory agencies to allow treated water from the LFG to energy plant to be reused on site at EDL's facility. Once the water treatment system is in place, water use by EDL will be reduced as it will be able to reuse treated water on-site in their plant operation. When this reduction occurs, water normally distributed for use by EDL from the on-site storage tanks will then become available for use by OCWR, with no change to the existing amount of water being provided by the City's infrastructure daily. It is anticipated that the water treatment system will result in a reduction of up to an estimated 15,000 gallons per day, which will offset a portion of the anticipated increased demand from the proposed project.

It is also noteworthy that OCWR has selected Covered Aerated Static Pile (CASP) technology for Phase II of the composting operation, as it is the most water efficient method of composting that is currently available. As the piles are kept covered during the composting process, water loss is minimized and there is a reduced need to consistently turn and water the piles as the aeration system is able to deliver air flow directly within the covered pile. Phase I, open windrow composting which has a higher daily water usage need, will be a temporary operation that is anticipated to occur for approximately the first 5-6 months of the composting operation. The highest water usage will occur at this time, but will be temporary in nature, consistent with prior fluctuations in water usage that have occurred at the landfill site during implementation of other construction projects. Phase I will be implemented to allow OCWR to begin providing infrastructure to help manage Orange County's organic waste stream more quickly to assist with SB 1383 compliance while it continues to develop Phase II.

In addition, due to a lack of potable groundwater in the City, the majority of the City's water supply comes from wholesale water producers including the Metropolitan Water District of Southern California (MWD) and the California Domestic Water Company (CDWC). While CDWC supplies water from the main San Gabriel Water Basin (groundwater), the City's own Water Master Plan indicates that the "City purchases more water than its entitled each year" (Water Master Plan p. 3-2). The Water Master Plan also indicates that the City already deals with the need for additional water by leasing additional shares from other CDWC member agencies that do not use their maximum allotment, and has the ability to purchase additional water from CDWC at a discounted price (Water Master Plan, pp. 3-2, 3-3). As such, water usage by the landfill and composting operations will not impact local groundwater sources nor cause depletion or affect recharge of groundwater.

OCWR also notes that it is not aware of an attempt by the City to reach out to OCWR regarding future planned projects at the Olinda Alpha landfill when identifying the projected future water demand for its Water Master Plan, despite the Water Master Plan recognizing that "Government Outside City" and "Other Government" are the two largest water users, comprising a combined more than 8% of total demand (based on 2019 data) (Water Master Plan, p. 4-4). Nevertheless, the Water Master Plan indicates that the City's existing water system has a surplus capacity of 7,093 gallons per minute, with a surplus storage capacity of 14.89 million gallons (Water Master Plan, pp. 6-17, 6-19, 6-20). This indicates that the existing City water system has a sufficient excess storage capacity and supply capacity to serve the additional use of the Valencia Greenery project.

Based on the information available with regard to existing use at the landfill and anticipated future need for the proposed project, and in light of the record, OCWR has concluded that the proposed Valencia Greenery Composting Operation will not result in a significant environmental impact. Despite the fact that the proposed project will result in a less than significant impact as it pertains to both groundwater and overall water usage, in recognition of the County's good working relationship with the City of Brea, OCWR is willing to discuss the possible provision of a water infrastructure study for the City should the City request such a study. However, OCWR notes that because the impact for the proposed project is already less than significant, such a study is not required.

Comment 5:

The City of Brea requests information on the community outreach conducted by Orange County Waste & Recycling, specifically targeting Brea residents within the general vicinity.

Response 5:

OCWR held a public information meeting on March 2, 2022 regarding the proposed Valencia Greenery composting operation at the Olinda Alpha Landfill. The purpose of the public meeting was to explain the proposed project and to solicit any comments from the public related to either the project or the MND prepared for the project. The public was notified of where they were able to review the MND documents (online or at OCWR Headquarters offices in Santa Ana), how they could provide comments (during the meeting, by mail, or by email), and were advised of the public review period timeframe (February 22 – March 23, 2022) for the MND. To provide advance notice of the project and the planned public information meeting, notice was sent by direct mail one week before the virtual meeting. The notice included basic information about the project, information about the public informational meeting, where CEQA documents were available for review and comment, and contact information for any questions and how to receive additional information.

OCWR sent out approximately 12,679 notices to owners/occupants living or owning property within an approximately 1.5 mile radius from the landfill property, including the neighborhoods of Olinda Ranch, Olinda Village, Blackstone, and La Floresta communities. In addition, the notice was made available on OCWR's website, was posted with the State Clearinghouse (SCH)

via CEQA Submit online, and was shared with local regulators and the City of Brea. Notice was also filed with the Orange County Clerk Recorder's Office.

Please let me know if you would like to discuss any of the responses above. OCWR appreciates the City of Brea's comments on this project. I can be reached at (714) 834-4107 or by email at <u>aimee.halligan@ocwr.ocgov.com</u>.

Sincerely,

amée Halligan

Aimee Halligan CEQA Manager



Attachment A – Line of Sight Viewpoints Valencia Greenery

VP 1 Taken from Olinda Village Community, facing northwest. Communication towers not visible. Water tanks will be located behind and below grade of ridgeline visible from Olinda Village and will not be visible.



VP 2 Taken from Yorba Linda valley view community area facing north. Tanks will be lower than and behind the communication towers.



VP 3 Taken from Olinda Ranch Community facing north. Communication towers not visible. Tanks will be located behind and at a lower grade than the communication towers not visible here. Water tanks will not be visible.



VP 4 Taken from Olinda Ranch Community facing north northeast. Communication towers not visible. Tanks will be located behind and below the ridgeline and will not be visible from this community.



VP 5 Taken from La Floresta Community facing north northeast. Second set of communication towers not visible from this vantage point. Water tanks will be located behind and lower than the tower this is not visible here. Water tanks will not be visible.



VP 6 Taken from Blackstone Community facing northeast. Second set of communication towers not visible from this vantage point. Water tanks will be located behind and lower than the tower this is not visible here. Water tanks will not be visible.



3.0 Errata

As a result of comments received during the public review period for the proposed project, this errata section is included in this Response to Comments document to indicate changes in strikethrough to show deleted text and underline to show added text for the IS/MND.

Section 1.6 Project Description – Demonstration Open Windrow Pilot Composting Operation at the Olinda Alpha Landfill, page 5. Text update for the second paragraph of this section as follows:

The open windrow composting pilot facility at the Olinda Alpha Landfill, which is now inactive, is-was located on an approximately one-acre area in the equipment maintenance area. Material feedstocks (compostable materials) composted include source separated residential curbside green waste, commercial green waste, processed green waste and wood waste. The pilot project does-did not have more than 60 tons (i.e., 92 cubic yards) of material on-site at any one time or process more than 250 tons of material per year. OCWR ereates created one windrow that is was no more than 92 cubic yards of material on-site with the approximate dimensions of 82 feet long, 10 feet wide and 6 feet high. The feedstock is was placed on top of a crushed asphalt surface for all weather access and surrounded by an earthen berm to prevent storm water run-on and run-off. The windrow is-was periodically turned with a loader, skid steer, or similar equipment, up to three times per week, to quicken the decomposition of the feedstock into compost and to maintain temperatures greater than 131 degrees Fahrenheit during the pathogen reduction process. The heavy equipment is already in use at the landfill on a routine basis and is was made available for the pilot project. The initial compost processing phase lasts at least 22 days or until the pile has completed the pathogen reduction process. Afterwards, the compost material is cured for a period that lasts between 30-60 days for further stabilization of the compost product. Altogether, the composting process takes up to 100 days. The active composting process requires the use of water to hydrate the windrow keeping the feedstock moist without overwatering. Water for the pilot project is was provided by a water truck that is already in use at the landfill operation.

Section 1.6 Project Description – Demonstration CASP Pilot Composting Operation at the Olinda Alpha Landfill, page 5-6. Text update for the paragraph in this section as follows:

As of the writing of this document, the proposed CASP pilot project is in the LEA approval process and <u>was anticipated to-should</u> be in operation in 2022. <u>Since that time OCWR has</u> <u>elected not to proceed with this pilot project, and but the anticipated process that was approved</u> <u>by the LEA is described below</u>. The demonstration pilot CASP composting operation at the Olinda Alpha Landfill <u>will was to</u> be located on an approximate 1-acre area in the existing equipment maintenance area. This area of the landfill is not currently being used for active landfill disposal. Material feedstocks to be used for composting include<u>d</u> source separated residential curbside green waste, commercial green waste, processed green waste and wood waste. These materials are already being delivered to the landfill. The demonstration pilot composting operation <u>was planned to will</u> not have more than 2,000 tons (i.e., 5,000 cubic yards) of material onsite at any one time or process more than 250 tons of material per year. The

feedstock <u>would be is</u> placed on top of a crushed asphalt surface for all weather access and surrounded by an earthen berm to prevent storm water run-on and run-off. Any green waste received that is noticeably highly odorous and determined to have the potential to contribute to off-site odors, or contaminated with residual solid waste, <u>would be is</u>-diverted and disposed at the active area of the landfill. The demonstration pilot composting operation will continue at the landfill as a research project, so that OCWR can continue to learn about composting, until such time as the Valencia Greenery is fully permitted and operational.

Section 1.6 Project Description – Phase II CASP Composting, page 10. Text update for the fourth paragraph of this section, as follows:

The same heavy equipment used for open windrow composting would also be used to construct the compost piles for CASP composting, and the same number of employees anticipated for Phase I as described above is also anticipated for Phase II. The CASP composting system will use a mechanical cover winder to apply and remove the covers from the compost piles. The composting occurs in the aerated piles for a minimum of 8 weeks; the first 4 weeks (21-28 days) are the active composting phase, after which the curing phase occurs for a minimum of 4 weeks. It is anticipated that the CASP composting will use less water when compared to open windrow composting, and therefore will not use more than 35,967 gallons per day, less than what is anticipated for open windrow composting described above.

Section 2.3 Air Quality, page 25. Text update for the first sentence of the second paragraph of this section as follows:

In addition, the new heavy equipment associated with the compost operation, which will include a windrow turner, two front loaders, a mobile screen, a cover turner (for Phase II CASP), a water truck, a dump truck, a chipper/grinder, and a conveyor associated with the 230 TPD composting operation would result in an insignificant increase in air emissions when compared to the existing environmental setting of all of the heavy construction equipment (i.e., scrapers, compactor bulldozers, water trucks, etc.) and associated emissions for the active Olinda Alpha Landfill that accepts approximately 6,850 tons of solid waste per day and approximately 5,175 tons of exempt wastes (i.e., processed green material for erosion control, asphalt and soil, and prior to 2020, processed green material for erosion control) per day based on 2019 data. The proposed Valencia Greenery composting operation will therefore result in a less than significant impact to air quality.

Section 2.3 Air Quality, page 36. Text update for Air Quality-Odor Control PDF & OCM-8 as follows (the PDF & OCM are also listed in the MMRP, and the same update will be reflected there):

(Air Quality-Odor Control PDF & OCM-8) For the open windrow composting operation in Phase I, the feedstock materials will be formed into elongated piles/open windrows, with dimensions not exceeding 12 feet in height, 20 feet in length and 100 feet long for composting with the addition of moisture as needed by the on-site water truck. For the CASP operation in Phase II, the pile dimensions will be 12 feet in height, 90 feet in length, and 22 feet in width, with an additional 10 feet of the pile length reserved for the push wall and equipment. Newly

constructed compost windrows in the Phase I open windrow process will initially be covered with at least 6 inches of finished compost within 24 hours of formation as required by SCAQMD Rule 1133.3. For the first 15 days after initial windrow formation, within six hours before turning, water will be applied as necessary to ensure the pile meets the wetness criteria described in Rule 1133.3. During this period, the temperature of each compost pile will be taken every day.

Section 2.8 Greenhouse Gas Emissions, page 51. Text update for the last sentence of the last block paragraph as follows:

The proposed composting operation will occur at an existing, active landfill. Trucks that were already bringing green waste material to the landfill will be diverted to the composting operation. At a maximum daily tonnage of 230 TPD, and using 20-ton per load end dump trucks, the Valencia Greenery will generate approximately 12 new two-way truck trips per day, with these trucks taking finished compost to end markets. Applying a Passenger Car Equivalent (PCE) factor of 2.0 to these trips, it is anticipated that full scale operation of the composting facility will result in approximately 58 Average Daily Trips (ADT). The 58 ADT would result in an insignificant increase in GHG emissions when compared to the existing environmental setting of the Olinda Alpha Landfill operation that generates approximately 677 two-way vehicle trips per day. In addition, the new heavy equipment associated with the compost operation, which will include a windrow turner, two front loaders, a mobile screen, a cover turner (for Phase II CASP), a water truck, a dump truck, a chipper/grinder, and a conveyor associated with the 230 TPD composting operation would result in an insignificant increase in GHG emissions when compared to the existing environmental setting of the heavy construction equipment (i.e., scrapers, compactor bulldozers, water trucks, etc.) and accompanying GHG associated with the active Olinda Alpha Landfill that accepts approximately 6,850 tons of solid waste per day and approximately 5,175 tons of exempt wastes (i.e., processed green material for erosion control, asphalt and soil, and prior to 2020, processed green material for erosion control) per day based on 2019 data.

Section 2.13 Noise, page 65. Text update for the last sentence of the first paragraph of this section, as follows:

LSA prepared a noise and vibration impact analysis for the proposed Valencia Greenery Composting Operation. This study is included as **Appendix F**. The study concludes that the proposed project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the proposed project in excess of standards established in the local general plan or noise ordinance. The proposed Valencia Greenery composting operation will operate during the daytime only and will not exceed the maximum noise ordinance levels specified by the County of Orange or the City of Brea. In addition, the noise and vibration study shows that the proposed project will not result in the generation of temporary or permanent excessive ground borne vibration or ground borne noise levels. The proposed composting operation will occur at an existing, active landfill. Trucks that were already bringing green waste material to the landfill will be diverted to the composting operation. At a maximum daily tonnage of 230 TPD, and using 20-ton per load end dump trucks, the Valencia Greenery will generate approximately 12 new two-way truck trips per day, with these trucks taking finished compost to end markets. Access to and from the Olinda Alpha Landfill is via SR-57, Imperial Highway, and Valencia Avenue. Applying a Passenger Car Equivalent (PCE) factor of 2.0 to these trips, it is anticipated that full scale operation of the composting facility will result in approximately 58 Average Daily Trips (ADT). The 58 ADT would result in an insignificant increase in noise and vibration impacts when compared to the existing environmental setting of the Olinda Alpha Landfill operation that generates approximately 677 two-way vehicle trips per day. In addition, the new heavy equipment associated with the compost operation, which will include a windrow turner, two front loaders, a mobile screen, a cover turner (for Phase II CASP), a water truck, a dump truck, a chipper/grinder, and a conveyor associated with the 230 TPD composting operation would result in an insignificant increase in noise and vibration impacts when compared to the existing environmental setting of all of the heavy construction equipment (i.e., scrapers, compactor bulldozers, water trucks, etc.) associated with the active Olinda Alpha Landfill that accepts approximately 6,850 tons of solid waste per day and approximately 5,175 tons of exempt wastes (i.e., processed green material for erosion control) per day based on 2019 data.

4.0 Final Mitigation Monitoring and Reporting Program

The Final Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with § 21081.6 of the Public Resources Code and § 15097 of the California Environmental Quality Act (CEQA) Guidelines, which requires all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a Mitigated Negative Declaration (MND) or an Environmental Impact Report (EIR). The MMRP ensures implementation of the measures being imposed to mitigate or avoid the significant adverse environmental impacts identified through the use of monitoring and reporting. Monitoring is generally an ongoing or periodic process of project oversight; reporting generally consists of a written compliance review that is presented to the decision-making body or authorized staff person. The Final MMR for the Valencia Greenery Composting Operation is included as **Attachment A**.

- It is the intent of the Final MMRP to: (1) provide a framework for document implementation of the required mitigation; (2) identify monitoring/reporting responsibility; (3) provide a record of the monitoring/reporting; and (4) ensure compliance with those mitigation measures that are within the responsibility of the lead agency and/or project applicant to implement.
- The following table lists mitigation measures adopted by the County in connection with approval of the proposed project, project action triggering implementation of the mitigation measure, and responsible and monitoring parties for verification of implementation.
- Only those environmental topics for which mitigation is required are listed in this Final Mitigation Monitoring and Reporting Program. The mitigation measures contained in this MMRP table are prescriptive and are provided for use by the implementing agency.

Excluding Mitigation Measures AS-1 and AS-2 identified in the MMRP for Aesthetics, while the environmental analysis in the MND did not conclude that the proposed composting operation will result in a significant environmental impact to any other environmental resources, in order to further reduce the proposed project's less than significant impacts, OCWR has added various Project Design Features and Operational Control Measures (PDF & OCM). All of these PDF & OCM are also included in the Mitigation Monitoring and Reporting Program (MMRP) and will also be incorporated into the Report of Composting Site Information (RCSI), to be reviewed and approved by the Orange County Health Care Agency, Environmental Health Division, acting in its capacity as the Orange County Solid Waste Local Enforcement Agency (LEA) for the California Department of Resources Recycling and Recovery (CalRecycle). The RCSI is the key engineering, permitting, construction and operations document that the LEA will rely upon when issuing the Solid Waste Facility Permit for the Valencia Greenery Composting Operation.

ATTACHMENT A

Mitigation Measure	Implementing	Method of	Timing of	Verification	Date			
	Action	Verification	Verification	Responsibility	Completed			
Aesthetics								
(Aesthetics AS-1) The proposed new water tanks to be located for the composting operations shall be painted tan or a similar neutral color or be constructed of a neutral-colored material that blends in with the adjacent topography. In addition, the tanks shall be painted with non-reflective (i.e., matte) paint.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	Prior to construction (ordering the water tanks) or during construction (painting the water tanks)	OCWR				
(Aesthetics AS-2) All outdoor lighting, including any construction-related lighting, shall be designed, installed and operated in a manner that ensures that all direct rays from project lighting are contained within the landfill property, and that residences and undeveloped areas that may provide wildlife value are protected from spillover light and glare.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	Prior to construction (ordering the water tanks) or during construction (painting the water tanks)	OCWR				
While the Mitigated Negative Declaration-Initial Study did not identify the following environmental topics as having significant environmental impacts, in order to further reduce the less than significant impacts for these environmental topics, OCWR has added the following Project Design Features and Operational Control Measures (PDF & OCM). All of these Project Design Features and Operational Control Measures included in this Mitigation Monitoring and Reporting Program will be incorporated into the Report of Composting Site Information (RCSI), to be reviewed and approved by the Orange County Health Care Agency, Environmental Health Division, acting in its capacity as the Orange County Solid Waste Local Enforcement Agency (LEA) for the California Department of Resources Recycling and Recovery (CalRecycle). The RCSI is the key engineering, permitting, construction and operations document that the LEA will rely upon when issuing the Solid Waste Facility Permit for the Valencia Greenery Composting								
	Air Quality – Dust C	Control						
(Air Quality-Dust Control PDF & OCM-1) Compost windrows will not be turned during high wind episodes exceeding wind speeds of 30 miles per hour in order to manage dust particulates.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR				
(Air Quality-Dust Control PDF & OCM-2) The compost operation entryway and often-traveled paths will be overlain with crushed rock or asphalt to prevent tracking of onsite materials and dust off-site.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During construction and operations	OCWR				

(Air Quality-Dust Control PDF & OCM-3) Unpaved roads shall be watered as necessary to minimize visible dust. Alternatively, roads may be paved.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility	During construction and operations	OCWR	
		Superintendent			
 (Air Quality-Dust Control PDF & OCM-4) The composting operation will implement SCAQMD's Rule 403, requiring control of fugitive dust during construction and operations via best-available control measures. These measures include the following: Apply non-toxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (i.e., previously graded areas inactive for 10 days or more). Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving). Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 ft. (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. Pave construction access roads at least 100 feet (30 meters) onto the site from the main road. 	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During construction and operations	OCWR	
or less					
		Control	1	1	1
(Air Quality-Odor Control PDF & OCM -1) The composting operation will accept compostable organic waste materials loads for composting. Initially these loads will have already been processed off-site (i.e., chip, ground and screened) to remove contamination prior to the processed green waste being delivered to the Valencia Greenery. Pre-processing will reduce the potential for highly odorous loads. When OCWR begins chipping and grinding and use of a conveyor to recover other uncontaminated compostable organic waste materials from the landfill for composting, OCWR will only recover materials that are not highly odorous. Highly odorous materials will continue to be buried at the landfill and not used in the composting	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	

operation.					
(Air Quality-Odor Control PDF & OCM-2) Upon acceptance at the composting operation, prior to unloading, any highly odorous loads that are determined to have the potential to contribute to off-site odors will be taken to the landfill working face for disposal.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-3) Upon acceptance at the composting operation, if any highly odorous loads are inadvertently unloaded, OCWR will collect the loads and take the material to the landfill working face for disposal.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-4) Compostable organic waste materials will be delivered to the composting operation on an as-needed basis to reduce odors.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-5) OCWR will not select or use any additives or amendments in the composting operation that are either highly odorous by themselves, are highly odorous when added to the compost piles, or are highly odorous over time during the active or curing phases of the composting operation.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-6) OCWR will comply with SCAQMD Rules 1133 and 1133.3 for composting.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-7) Incoming pre- processed materials will be stored on-site no longer than 48 hours. PGM, processed agricultural material, and other compostable organic waste materials will be loaded into a dump truck by a front loader as soon as possible and delivered to the active composting area, where the material will then be placed into new compost piles by a front loader.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-8) For the open windrow composting operation in Phase I, the feedstock materials will be formed into elongated piles/open windrows, with dimensions not exceeding 12 feet in height, 20 feet in length and 100 feet long for composting with the addition of moisture as needed by the on-site water truck. For the CASP	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	

operation in Phase II, the pile dimensions will be 12 feet in height, 90 feet in length, and 22 feet in width, with an additional 10 feet of the pile length reserved for the push wall and equipment. Newly constructed compost windrows in the Phase I open windrow process will initially be covered with at least 6 inches of finished compost within 24 hours of formation as required by SCAQMD Rule 1133.3. For the first 15 days after initial windrow formation, within six hours before turning,					
water will be applied as necessary to ensure the pile meets the wetness criteria described in Rule 1133.3. During this period.					
the temperature of each compost pile will be taken every day.					
(Air Quality-Odor Control PDF & OCM-9) Active compost shall be maintained under aerobic conditions at a temperature of 55 degrees Celsius (131 degrees Fahrenheit) or higher for the Process to Further Reduce Pathogens (PFRP) period of 15-days or longer as specified in 14 CCR 17868.3(b)(3) utilizing wheeled loaders or a windrow turner. During the period when the compost is maintained at 55 degrees Celsius (131 degrees Fahrenheit) or higher, there shall be a minimum of five turnings of the windrow.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-10) OCWR has prepared an Odor Impact Minimization Plan (OIMP) for the proposed composting operation in compliance with 14 CCR 17863.4. The OIMP is included as Appendix E to the Mitigated Negative Declaration for the composting operation. All odor control measures included in the OIMP are hereby incorporated into this MMRP. Per the OIMP, each operating day, designated site personnel shall assess and evaluate the perimeter of the composting operation area and landfill boundary for objectionable odors. BMPs and good housekeeping measures will be implemented to minimize the release of objectionable odors. BMPs include:	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
 Maintaining adequate heat in the piles through appropriate pile density, limiting turning frequency and/or pile dimensions. Provide adequate moisture throughout the active composting process. Frequent monitoring of temperature and moisture content assures composting conditions are within 					

	accentable parameters					
	acceptable parameters.					
Goodh	avaluating manufactures that will be implemented include:					
Good II	ousekeeping measures that will be implemented metude.					
0	Elization of the state of the s					
0	Eliminating areas with the potential for ponding water.					
0	Maintaining reasonably sized stockpiles of incoming					
	leedstock by deploying it into windrows within 72					
	nours.	L CO 1' 1	X7 'C' (' 1	D '	OCUUD	
(Air Q	uality-Odor Control PDF & OCM-11) The OIMP	Issuance of Solid	Verification by	During	OCWR	
require	s that OCWR implement the following steps in the event	Waste Facility	OCWR	operations		
that o	ojectionable odors are detected at the composting	Permit by LEA	Composting			
operation	on site:		Facility			
			Superintendent			
0	Stop all operations if they are causing off-site odor					
	impacts until the source of the odors is identified,					
	corrected and the odor migration ceases.					
0	Designated site personnel shall investigate likely					
	source of odors.					
0	Designated site personnel shall determine wind					
	patterns and direction at the time odor was detected.					
0	Based on the intensity of odor nuisance, designated					
	site personnel shall determine if odor has travelled off-					
	site by surveying the perimeter of the composting					
	facility and vicinity of potential off-site receptors.					
0	If the source of odors is found to be the composting					
	operation, determine if on-site management practices					
	(e.g., mixing odiferous materials with sawdust or other					
	bulking agent, turning the windrows less frequently,					
	remove odiferous materials and dispose of them in the					
	landfill, etc.) could remedy any odor problems and					
	immediately take steps to remedy the situation.					
0	Determine whether or not the odor has moved off-site					
	and if so, if it significant enough to warrant contacting					
	the adjacent neighbors and/or the LEA.					
0	If it has been determined that odor has moved off-site,					
	the incident shall be recorded in the compost daily					
	operational logbook which shall include all actions and					
	activities taken to resolve or minimize odor nuisance					

 for future reference and operational considerations. Do not start operations again (i.e., accepting additional green waste in temporary storage area, placement and formation of new windrows) until the wind and meteorological conditions are favorable and will not promote off-site odors. 	Issuence of Solid	Varification by	During	OCWB	
the following complaint response protocols will be implemented:	Waste Facility Permit by LEA	OCWR Composting Facility Superintendent	operations	OC WK	
 and/or regulators shall be recorded in the facility operational logbook and complaint log. Designated site personnel shall contact complainant and/or regulator to obtain details of the complaint such as name, time, location and nature or characteristics of odors. 					
 Designated site personnel shall notify appropriate regulators of the complaint. Designated site personnel shall investigate and implement methods in assessing oder impacts. 					
 Designated site personnel shall immediately implement additional or appropriate measures to minimize odors. 					
• Once the OIMP measure or measures have been implemented and the odor has been minimized, designated site personnel shall follow up with complainant.					
(Air Quality-Odor Control PDF & OCM-13) The Olinda Alpha Landfill maintains an on-site meteorological station that monitors wind direction, wind speed, temperature, and relative humidity. Data from this station will be used to help monitor conditions at the composting operation if an odor issue arises and also prior to an odor issue occurring.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-14) For the composting operation, OCWR will establish contingency plans for operating downtime (e.g., equipment malfunction, power outage).	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR	
(Air Quality-Odor Control PDF & OCM-15) OCWR shall	Issuance of Solid	Verification by	During	OCWR	

	1	1		1	1
post telephone numbers at the entrance of the composting	Waste Facility	OCWR	operations		
facility to allow members of the public to contact the OCWR	Permit by LEA	Composting			
composting facility superintendent to report odor complaints.		Facility			
		Superintendent			
(Air Quality-Odor Control PDF & OCM-16) Should	Issuance of Solid	Verification by	During	OCWR	
compostable organic waste material arrive at the composting	Waste Facility	OCWR	operations		
operation with noticeable odors, options for reducing odors	Permit by LEA	Composting			
would include but are not limited to the following: reject highly		Facility			
odorous loads and landfill the material; eliminate troublesome		Superintendent			
or contaminated feedstocks; mix materials upon receipt (i.e., to		_			
increase material porosity); stockpile bulking agents or high					
carbon amendments; make smaller piles; blanketing odorous					
material with a six inch to one-foot layer of bulking agent, high					
carbon amendments or finished compost.					
(Air Quality-Odor Control PDF & OCM-17) Should	Issuance of Solid	Verification by	During	OCWR	
compostable organic waste material in the temporary unloading	Waste Facility	OCWR	operations		
and storage area begin to generate odors, options for reducing	Permit by LEA	Composting	1		
odors would include but are not limited to the following:		Facility			
expedite material processing; first in, first out processing;		Superintendent			
reduce the size of material stockpiles; blanketing odorous		1			
material with a six inch to one-foot layer of bulking agent, high					
carbon amendments or finished compost; reduce the volume of					
incoming materials; identify alternative facilities for incoming					
materials.					
(Air Quality-Odor Control PDF & OCM-18) Should	Issuance of Solid	Verification by	During	OCWR	
compostable organic waste material begin to generate odors	Waste Facility	OCWR	operations		
during mixing and material handling, options for reducing odors	Permit by LEA	Composting	1		
would include but not be limited to the following: create	5	Facility			
windrow piles that are sufficiently blended; combine materials		Superintendent			
to achieve a high carbon to nitrogen ratio (greater than 30 to 1):		1			
create piles with good porosity; ensure that mixing					
areas/activities are located as far as possible from sensitive					
receptors; reduce mixing/materials handling activity during					
stagnant air conditions: reduce mixing/materials handling					
activity when wind is in the direction of sensitive receptors:					
mist water or odor neutralizer at dust generation points.					
(Air Quality-Odor Control PDF & OCM-19) Should	Issuance of Solid	Verification by	During	OCWR	
compostable organic waste material begin to generate odors	Waste Facility	OCWR	operations		
during the composting process. options for reducing odors	Permit by LEA	Composting	1		
would include but not be limited to the following: turn regularly		Facility			

to re-invigorate the composting process; maintain sufficient moisture in windrows; avoid over-watering windrows; make smaller windrows to increase passive aeration; increase porosity and bulk density; consider blanketing odorous materials with a six-inch to one-foot layer of bulking agent; make piles on a one- foot bed of overs to increase airflow; reduce turning/material handling activities when winds are blowing in the direction of nearby receptors; diligently manage and monitor the composting process.		Superintendent			
(Air Quality-Odor Control PDF & OCM-20) Should	Issuance of Solid	Verification by	During	OCWR	
compostable organic waste material begin to generate odors during screening, options for reducing odors would include but not be limited to the following: reduce screening activities during stagnant air conditions; reduce screening activities when wind is in the direction of nearby receptors; use mist water or neutralizer at dust generation points.	Waste Facility Permit by LEA	OCWR Composting Facility Superintendent	operations		
(Air Quality-Odor Control PDF & OCM-21) Should	Issuance of Solid	Verification by	During	OCWR	
compostable organic waste material begin to generate odors from water ponding after a rain event, options for reducing odors would include but not be limited to the following: inspect piles after major rain events; grade the site to eliminate puddles, depressions and wheel ruts where water collects; absorb ponded water with wood chips/other absorbent, fill potholes with soil/pad material.	Waste Facility Permit by LEA	OCWR Composting Facility Superintendent	operations		
(Air Quality-Odor Control PDF & OCM-22) Should	Issuance of Solid	Verification by	During	OCWR	
compostable organic waste material begin to generate odors after as a result of un-composted material in aisles between the windrows, options for reducing odors would include but not be limited to the following: clean aisles of spilled material (particularly at the end of each day; mechanically sweep paved areas at the end of each shift; apply water and/or neutralizer to reduce dust during dry conditions.	Permit by LEA	Composting Facility Superintendent	operations		
(Air Quality-Odor Control PDF & OCM-23) Should compostable organic waste material begin to generate odors	Issuance of Solid Waste Facility	Verification by	During	OCWR	
during curing, options for reducing odors would include but not be limited to the following: increase processing time prior to moving to curing; decrease curing pile size; review moisture content of in-process compost; aerate curing piles; screen after curing to maintain porosity.	Permit by LEA	Composting Facility Superintendent	operations		

(Air Quality-Odor Control PDF & OCM-24) Should	Issuance of Solid	Verification by	During	OCWR	
collected leachate and storm water in the lined pond begin to	Waste Facility	OCWR	operations		
generate odors, options for reducing odors would include but	Permit by LEA	Composting			
not be limited to the following: review NPDES procedures to		Facility			
minimize storm water contact with organic materials; remove		Superintendent			
particles from water draining into the lined pond; filter		1			
stormwater through a filter berm or sock; clean out lined pond					
during the dry season; reapply collected leachate and storm					
water to active compost piles; install aeration system.					
Hazards and Hazardous	Materials – Hazardo	us Waste Exclusion	and Control	1 1	
(Hazards and Hazardous Materials – Hazardous Waste	Issuance of Solid	Verification by	During	OCWR	
Exclusion and Control PDF & OCM-1) The existing	Waste Facility	OCWR	operations		
hazardous waste exclusion and load-checking program for the	Permit by LEA	Composting			
Olinda Alpha Landfill will also be used for the proposed		Facility			
composting operation. Loads are inspected both at the fee booth		Superintendent			
and during unloading. If any hazardous materials are discovered		1			
in loads at the fee booth, the hauler will be turned away from					
the landfill and provided with information regarding acceptable					
hazardous waste disposal facilities. Any hazardous wastes that					
are discovered after unloading, if safe to handle, will be stored					
at the temporary hazardous waste storage area at the landfill,					
before being transported off-site by a certified hazardous waste					
hauler for proper disposal.					
Hazards and Hazardous	s Materials – Exclusio	on of Unacceptable	Solid Wastes		
(Hazards and Hazardous Materials – Exclusion of	Issuance of Solid	Verification by	During	OCWR	
Unacceptable Solid Wastes PDF & OCM-1) For the	Waste Facility	OCWR	operations		
composting operation, all compostable organic waste materials	Permit by LEA	Composting			
received will be initially be processed, ground and screened	•	Facility			
prior to delivery to the composting operation to eliminate most		Superintendent			
non-compostable organic waste solid waste materials prior to		-			
delivery to the composting operation. However, if contaminated					
loads are received at the composting operation that contain					
unacceptable solid wastes, these loads will be immediately					
collected and transported to the landfill working face for					
disposal. When OCWR begins chipping and grinding and use of					
a conveyor to recover other uncontaminated compostable					
organic waste materials from the landfill for composting (i.e.					
wood waste), OCWR will only recover materials that are not					
highly odorous. Highly odorous materials will continue to be					
buried at the landfill and not used in the composting operation.					

Hazards and Hazardous Materials – Fire Prevention and Protection								
(Hazards and Hazardous Materials-Fire Prevention and Protection PDF & OCM-1) OCWR shall provide fire prevention, protection and control measures, including, but not limited to, temperature monitoring of windrows and piles, adequate water supply for fire suppression, and the isolation of potential ignition sources from combustible materials. A strip of sufficient width of cleared land must be maintained along the perimeter of site operations to act as a fire barrier or break. OCWR will consult with OCFA to determine the size of the fire break.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR				
(Hazards and Hazardous Materials-Fire Prevention and Protection PDF & OCM-2) The composting operation will be designed and operated to meet all Orange County Fire Authority (OCFA) fire flow and fire safety requirements. This will include but not be limited to the spacing between windrows; the number, width and length of fire lanes; the distance of the windrows and material storage areas to flammable vegetation, a water tank, water pumps, water lines and fire hydrants.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR				
(Hazards and Hazardous Materials-Fire Prevention and Protection PDF & OCM-3) All 20-foot wide compost pile areas will be surrounded by 20-foot wide fire access lanes. Perimeter roads will be a minimum width of 20 feet and expand to a minimum width of 40 feet at hydrant locations to accommodate fire response.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During operations	OCWR				
]	Hydrology and Water	· Quality						
(Hydrology and Water Quality PDF & OCM-1) Prior to construction of storm water containment and treatment facilities and prior to grading of the composting operation project site, OCWR shall prepare a Storm Water Pollution Prevention Plan ("SWPPP) to obtain coverage under the State-wide general construction storm water pollution National Pollutant Discharge Elimination System ("NPDES") permit. The BMPs outlined in the SWPPP shall be implemented in project construction and operations. BMPs are used to control surface water runoff, erosion and	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	Prior to construction	OCWR				

(Hydrology and Water Quality PDF & OCM-3) OCWR shall	Issuance of Solid	Verification by	During	OCWR	
(Hydrology and Water Quality PDF & OCM-2) Prior to operation of the composting operation, OCWR shall apply for coverage under the State-wide general storm water NPDES permit for industrial facilities or apply for an individual facility storm water NPDES permit.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	Prior to operations	OCWR	
- BMPs include both non-structural and structural controls. Non-structural controls will include BMPs such as preventative maintenance, proper materials handling, spill prevention and control and litter control. Structural controls would include BMPs such as overhead coverage, secondary containment, roof gutters, paved surfaces designed to maintain positive drainage and curbs.					
- Berms, silt fences, sandbags, hay bales, wittle-wattles, geo- logs and straw mats will be installed during construction to reduce erosion.					
- Spills will be reported and proper spill response procedures will be promptly implemented. Should such a situation occur, soils affected by spills and leaks from landfill equipment will be removed. Proper clean-up procedures will first involve removal of the impacted soil layer. The soil will then be placed in 55- gallon drums for off-site treatment and disposal.					
- Equipment and parts with a potential to impact storm water are to be placed under tarps as needed during storm events.					
- Vehicles and equipment will be kept in good working order. Equipment and vehicles with leaks are to be repaired promptly by trained mechanics.					
- Fuel delivery or dispensing will be observed by facility personnel. Fuel delivery or dispensing that is not observed by facility personnel is prohibited.					
siltation at the project site during the construction of the proposed facility. Typical BMPs are listed below:					

conduct quarterly sampling and testing of windrow leachate and	Waste Facility	OCWR	operations		
runoff for the presence of any hazardous substances at	Permit by LEA	Composting			
concentrations above those effluent standards set forth in the		Facility			
project's NPDES permit.		Superintendent			
(Hydrology and Water Quality PDF & OCM-4) OCWR shall	Issuance of Solid	Verification by	During	OCWR	
fully contain all surface water runoff and leachate resulting	Waste Facility	OCWR	operations		
from the composting operation. Collected surface water runoff	Permit by LEA	Composting	-		
and leachate will be collected on-site from the composting	-	Facility			
operation lined pond, and reused with the composting operation.		Superintendent			
(Hydrology and Water Quality PDF & OCM-5) Testing of	Issuance of Solid	Verification by	During	OCWR	
finished compost (i.e., after the curing process is complete) for	Waste Facility	OCWR	operations		
pathogens, metals and physical contamination will be	Permit by LEA	Composting	1		
performed in accordance with California Code of Regulations		Facility			
Title 14 requirements.		Superintendent			
(Hydrology and Water Quality PDF & OCM-6) Although	Issuance of Solid	Verification by	During	OCWR	
OCWR has no plans to use additives or amendments as part of	Waste Facility	OCWR	operations		
the composting operation at this time, should this change in the	Permit by LEA	Composting	-		
future, any additives or amendments that will be used shall be		Facility			
non-toxic and subject to the approval of the RWQCB and the		Superintendent			
LEA prior to their use.		-			
(Hydrology and Water Quality PDF & OCM-7) For the	Issuance of Solid	Verification by	During	OCWR	
Valencia Greenery, the site will be graded such that the center	Waste Facility	OCWR	operations		
of each compost pile will be located on a high point and the	Permit by LEA	Composting			
compost deck will be graded at 2 percent toward the access	-	Facility			
lanes which will be graded at 2 percent to the southeast as					
alles which whi be graded at 2 percent to the southeast, as		Superintendent			
shown on Figure 4 , conveying flows to an approximate 8.9-		Superintendent			
shown on Figure 4 , conveying flows to an approximate 8.9- acre feet lined composting operation pond, that will be		Superintendent			
shown on Figure 4 , conveying flows to an approximate 8.9- acre feet lined composting operation pond, that will be constructed to capture storm water runoff and leachate from the		Superintendent			
shown on Figure 4 , conveying flows to an approximate 8.9- acre feet lined composting operation pond, that will be constructed to capture storm water runoff and leachate from the composting operation. The composting operation lined pond		Superintendent			
shown on Figure 4 , conveying flows to an approximate 8.9- acre feet lined composting operation pond, that will be constructed to capture storm water runoff and leachate from the composting operation. The composting operation lined pond dimensions were determined based on National Oceanic and		Superintendent			
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shown on Figure 4 , conveying flows to an approximate 8.9- acre feet lined composting operation pond, that will be constructed to capture storm water runoff and leachate from the composting operation. The composting operation lined pond dimensions were determined based on National Oceanic and Atmospheric Administration (NOAA) precipitation data based for a 25-year, 24-hour storm event (per Order WQ 2015-0121-		Superintendent			
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(Noise Control PDF & OCM-1) Construction activities will be limited to between the hours of 7:00 a.m. and 7:00 p.m. on Mondays through Saturdays. The County of Orange shall have the discretion to permit construction activities to occur outside of the allowable hours if compelling circumstances warrant	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During construction	OCWR
such an exception (e.g., weather conditions to pour concrete).	I	Varifiantian has	During	OCWD
(Noise Control PDF & OCM-2) Construction contractors shall limit haul truck deliveries to between the hours of 6:00 a.m. and 7:00 p.m. on Mondays through Saturdays, with a start time consistent with the start of site operational hours (except in the case of urgent necessity). The contractor shall prepare a haul route exhibit for review and approval by OCWR prior to commencement of construction activities. The haul route exhibit shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck- related noise. Per the County's Cooperative Agreement with the City of Brea, the designated access roads to the Olinda Alpha Landfill are SR-57, Imperial Highway, and Valencia Avenue. These same roadways will be used by vehicles going to and from the composting operation during both the construction and operational phases of the project.	Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During construction and operations	OCWR
(Noise Control PDF & OCM-3) All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During construction and operations	OCWR
(Noise Control PDF & OCM-4) All trucks, windrow turners, loaders and any other heavy equipment used during both the construction and operational phases of the project shall be operated with properly operating and well-maintained mufflers.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During construction and operations	OCWR
(Noise Control PDF & OCM-5) Truck drivers shall turn off engines when not in use; diesel trucks servicing the project shall not idle for more than five (5) minutes.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility Superintendent	During construction and operations	OCWR
(Noise Control PDF & OCM-6) OCWR shall post telephone numbers at the entrance of the composting facility to allow members of the public to contact the OCWR composting facility superintendent to report noise complaints.	Issuance of Solid Waste Facility Permit by LEA	Verification by OCWR Composting Facility	During construction and operations	OCWR

			1			
		Superintendent				
(Noise Control PDF & OCM-7) The construction contractor	Issuance of Solid	Verification by	During	OCWR		
shall locate equipment staging in areas that will create the	Waste Facility	OCWR	construction			
greatest distance between construction-related noise sources and	Permit by LEA	Composting				
most noise-sensitive receptors nearest the project site during all		Facility				
project construction.		Superintendent				
(Noise Control PDF & OCM-8) The construction contractor	Issuance of Solid	Verification by	During	OCWR		
shall place all stationary construction equipment so that the	Waste Facility	OCWR	construction			
emitted noise is directed away from the sensitive receptors	Permit by LEA	Composting				
nearest the project site.		Facility				
		Superintendent				
Transportation						
(Transportation PDF & OCM-1) Trucks going to and coming	Issuance of Solid	Verification by	During	OCWR		
from the composting operation will be required to use the same	Waste Facility	OCWR	construction and			
roadways that waste hauling vehicles use for accessing the	Permit by LEA	Composting	operations			
landfill operation. These authorized roadways include SR-57,	-	Facility				
Imperial Highway and Valencia Avenue.		Superintendent				