



(Letter Sent Via Email)

February 10, 2020

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 Capistrano Greenery Composting Operation, Facility Number 30-AB-0468 – Orange County (SCH No. 2020019030)

Dear Ms. Rajagopal:

The County of Orange, OC Waste & Recycling department (OCWR) has the following responses to your comment letter dated February 7, 2020 regarding the Mitigated Negative Declaration (MND) for the proposed Capistrano Greenery Composting Operation at the Prima Deshecha Landfill.

Comment 1:

“Page 8 – Proposed Project: It states, active compost pile dimensions will be no greater than 12 feet in height, 20 feet wide, and 100 feet in length. In page 19, under Section 2.1 (Aesthetics), it states the height of composting rows is 12 feet maximum. However, in page 3 of Appendix C (Air Quality), it states the active compost pile dimensions would be no greater than 8 feet in height, 20 feet wide and 150 feet in length. Please clarify this discrepancy.”

Response 1:

Since the time of the preparation of the air quality study for the project, OCWR’s engineering consultant has made minor changes to some aspects of the engineering design for the proposed project. As a result, the size of the compost piles changed resulting in a maximum height of 12 feet for the compost piles, 20 feet wide and 100 feet long, as stated in both the MND project description and in the aesthetics section. While Appendix C air quality analysis does indicate that the piles would be a maximum of 8 feet in height (should be 12 feet), 20 feet wide (correct) and 150 feet in length (should be 100 feet), this would not result in a significant change to the MND air quality impact analysis, since the maximum daily throughput for the proposed composting operation would remain unchanged, as would the amount of storage space for incoming materials, amount and type of heavy equipment, hours per day for the operation, amount of space for processing incoming materials and the amount of space for storing finished compost products awaiting shipment to off-site markets.

Comment 2:

“Page 8 – Proposed Project: It states, altogether the composting process will take approximately 20 weeks or 5 months. However, in page 3 of Appendix C (Air Quality) it states 4 months.”

Response 2:

Since the time of the preparation of the air quality study for the project, OCWR’s engineering consultant has made minor changes to some aspects of the engineering design for the proposed project. As a result, the length of time for completing the compost process changed from four months to five months. While Appendix C air quality analysis does indicate that the length of time for completing the composting process would be four months (should be five months), this would not result in a significant change to the MND air quality impact analysis, since the air quality impact analysis is essentially based on the maximum daily throughput of the composting operation (approximately 204 tons per day) as measured against the threshold of significance for daily air quality emissions, found in the SCAQMD CEQA Air Quality Handbook, which is discussed in the MND Appendix C Air Quality Impact Analysis.

Comment 3:

“Page 11 – Proposed Project: It states, collected surface water and leachate will be captured on-site from the composting operation lined pond, and reused with the composting operation. In accordance with Title 14 CCR, Section 17867(a)(13) – the operator shall ensure that leachate is controlled to prevent contact with the public. The site shall be maintained to prevent leachate from forming by percolating through the windrows and flowing into the ground. Ponding underneath or near compost piles causes leachate that emits odors. As stated, if the leachate is captured and reused for the composting operation, the LEA is concerned with potential odor problems.”

Response 3:

Stormwater collected at the facility will be managed through a stormwater prevention and pollution plan (SWPPP) in accordance with the Statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ (Industrial General Permit or IGP). In addition, the facility will be enrolled under the General Waste Discharge Requirements for Composting Operations (Order WQ 2015-0121-DWQ). Any water applied to the compost piles will only be sufficient to keep the piles at an optimum moisture content between 45% to 55% to promote biological degradation and Process to Further Reduce Pathogens (PFRP) while staying within the water holding capacity of the compost pile. This will eliminate potential ponding of leachate at the compost facility. Any stormwater that sheet flows from the facility will flow into the 25-year 24-hour retention basin. The collected stormwater can be reused onsite without generating odors provided the optimum moisture content and proper aeration is maintained. Furthermore, the stormwater can be diluted with potable water if odors are present that could lead to a nuisance. Any leachate that is collected and is determined to be unusable will be discharged under the IGP.

Comment 4:

“Appendix E – OIMP: Page 8, Table 1 – Under excessive watering of compost pile, line item (2), it states mix in additional feedstock material.....provided that total volume of the pile does not exceed 92 cy. What is this volume? This may need to be checked.”

Response 4:

The 92 cy refers to the maximum volume of material onsite allowed under the pilot project. For the proposed project, reference to the 92 cy will be eliminated.

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 john.arnau@ocwr.ocgov.com.

Sincerely,



John J. Arnau
CEQA Manager

Arnau, John [OCWR]

From: Rajagopal, Shyamala <SRajagopal@ochca.com>
Sent: Friday, February 7, 2020 10:36 AM
To: Arnau, John [OCWR]
Cc: Cross, Kathryn; Sharifian, Akbar
Subject: LEA Comments to the Draft MND for Capistrano Greenery Composting Operation - SCH No. 2020019030

Hello John,

The LEA has reviewed the Draft Mitigated Negative Declaration dated January 2020 – Initial Study for the Proposed Capistrano Greenery Composting Operation at the Prima Deshecha Landfill site. Based on the review, the LEA has the following comments:

1. Page 8 – Proposed Project

It states, Active compost pile dimensions will be no greater than 12 feet in height, 20 feet wide, and 100 feet in length. In Page 19, under Section 2.1 (Aesthetics), it states the height of composting rows is 12 feet maximum. However, in Page 3 of Appendix C (Air Quality), it states the active compost pile dimensions would be no greater than 8 feet in height, 20 feet wide, and 150 feet in length.

Please clarify this discrepancy.

2. Page 8 – Proposed Project

It states, Altogether the composting process will take approximately 20 weeks, or 5 months. However, in Page 3 of Appendix C (Air Quality), it states 4 months.

Please clarify and correct this discrepancy.

3. Page 11 – Proposed Project

It states, Collected surface water runoff and leachate will be captured on-site from the composting operation lined pond, and reused with the composting operation.

In accordance with Title 14 CCR, Section 17867 (a)(13) – The operator shall ensure that leachate is controlled to prevent contact with the public. The site shall be maintained to prevent leachate from forming by percolating through the windrows and flowing onto the ground. Ponding underneath or near compost piles causes leachate that emit odors. As stated, if the leachate is captured and reused for composting operation, the LEA is concerned with potential odor problems.

4. Appendix E – OIMP

Page 8, Table 1 – Under excessive watering of compost pile, line item (2), it states mix in additional feedstock material.....provided that total volume of the pile does not exceed 92 cy. What is this volume? This may need to be checked.

Thank you for the opportunity to review and comment on this environmental document.

If you have any questions, please feel free to contact me or Kathryn Cross at (714) 433-6270

Regards,

Shyamala Rajagopal

Environmental Health, LEA

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