



August 26, 2024

Patrick Womble, Environmental Resources Manager
Merced County Regional Waste Management Authority
7040 N. Highway 59
Merced, CA 95348
pwomble@mcrwma.org

Subject: SCH No. 2014061081 – Supplemental Draft Environmental Impact Report for the Highway 59 Landfill Composting Facility

Dear Patrick Womble,

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

The Merced County Regional Waste Management Authority (MCRWA), acting as Lead Agency, has prepared and circulated a Supplemental Draft Environmental Impact Report (SDEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed project is located at 7040 North Highway 59, Merced, CA 95348 within the existing Highway 59 Landfill. The new composting facility would be located within the boundaries of the existing windrow compost operation at the Highway 59 Landfill. The existing landfill is bounded on the west by State Route 59 and vacant grazing land, on the east by vacant grazing land and an abandoned railroad grade, and on the north and south by orchards. Residential uses are located farther to the south. The total land area associated with the composting facility is approximately 7.5 acres, and up to 5 acres of temporary storage (two 2.5-acre areas for storage). The project site also includes the entirety of parcel 170-070-002 (approximately 35.6 acres), although only 2.5 acres of this area would be associated with potential temporary compost storage.

The current onsite activity is a green waste windrow composting operation that receives no more than 25,000 tons of green waste per year and stores no more than 12,500 cubic yards of organic material onsite. The proposed project would:

- Increase annual tonnage from 25,000 tons per year to 75,000 tons per year
- Increase onsite storage of organic material from 12,500 cubic yards to 100,000 cubic yards
- Expand the types of accepted feedstocks to include agricultural materials, food material, digestate, green material, mixed material, organic wastes, and preprocessed feedstock ready covered aerated static pile (CASP) materials
- Replace windrow composting with a CASP composting system

The project would receive an average of 300 tons per day and a maximum of 75,000 tons per year. No increase in truck trips is anticipated. The Highway 59 Landfill is open to the public from 7:00 a.m. to 3:30 p.m., Monday through Saturday, and closed to the public on major holidays. The landfill is also open seven nights per week, from 3:00 a.m. to 7:00 a.m., for commercial hauling vehicles only, and is permitted to be open 24 hours per day, 7 days per week. The project would operate 24 hours per day for facility operations, as needed.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the DSEIR, in addition to the specific location noted.

Section 2.7: Potential Approvals and Permits Required

This section states that the Enforcement Agency Notification (EAN) would be modified to accommodate the additional throughput of material. The acceptance of additional types of feedstock and the increase in the amount of materials stored on site would require this activity to be regulated under a full Solid Waste Facilities Permit (SWFP) issued by the Local Enforcement Agency (LEA) for the County of Merced. The SWFP would supersede the EAN. Requirements for a SWFP application package are outlined in [Title 27 CCR Section 21570](#).

Solid Waste Regulatory Oversight

The County of Merced, Division of Environmental Health, is the Local Enforcement Agency (LEA) and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact Esther Canal, the LEA, at 209-381-1081 to discuss the regulatory requirements for the proposed project.

Conclusion

The solid waste facilities permit process requires CalRecycle to concur on the issuance of the proposed permit. This is a discretionary action and therefore requires CalRecycle to comply with CEQA requirements as a Responsible Agency.

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.

If you have any questions regarding these comments, please contact me at 916.341.6119 or by e-mail at Harprit.Mattu@calrecycle.ca.gov.

Sincerely,

Harprit Mattu, REHS, Environmental Scientist

Permitting & Assistance Branch – North
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Eric Kiruja, Supervisor
Permitting & Assistance Branch – North

Esther Canal, REHS, LEA
County of Merced, Division of Environmental Health