



August 19, 2020

8/21/2020

Governor's Office of Planning & Research

Kevin Gaxiola
Orange County Waste & Recycling
601 North Ross Street, Floor 5
Santa Ana, CA 92701

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STATE CLEARINGHOUSE

Subject: SCH No. 1999041035 – Notice of Preparation for Prima Deshecha General Development Plan - Zone 4 Landfill Construction Projects and Source Separated Organics Recycling Facility – Orange County (Facility No. 30-AB-0019)

Dear Mr. Gaxiola:

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 Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) 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 Prima Deshecha General Development Plan - Zone 4 Landfill Construction Projects and Source Separated Organics Recycling Facility (proposed project) is located at the Prima Deshecha Landfill (Landfill) which is owned by Orange County and operated by OCWR. OCWR is a County department that is overseen by the Orange County Board of Supervisors. Prima Deshecha Landfill is 1,530 acres (ac) and is located in southeastern Orange County; partially within San Juan Capistrano (570 ac), San Clemente (133 ac), and unincorporated Orange County (827 ac). The landfill is located at 32250 Avenida La Pata, and access is provided by the Golden State Freeway (Interstate 5 [I-5]), Ortega Highway (State Route 74 [SR-74]), and La Pata Avenue. The Prima Deshecha Landfill site is divided into five zones, called Zones 1 through 5. Zone 1 is the current landfilling area, with an estimated closure date of approximately 2050. Zone 4 is the future landfill development area, with an estimated closure date of approximately 2102.

The proposed Project includes the following components:

1. Changes to the phasing of operations between Zone 1 and Zone 4 of the landfill to allow for concurrent operations;

2. Blasting, excavation, on-site relocation, pulverizing into soil, soil stockpiling and off-site soil removal of hard rock material in Zone 4, referred to as the San Onofre Breccia area;
3. Imported soil trips for liner installation that will occur for all future Zone 4 development phases; and
4. Construction and operation of a Source Separated Organics (SSO) recycling facility.

COMMENTS

Revision to the Current Solid Waste Facility Permit

The proposed project includes the construction of an SSO recycling facility, which based on the description, may be regulated as a Large Volume In-vessel Digestion Facility, pursuant to Title 14, California Code of Regulations (CCR), Section 17896.2(a)(15) or a Large Volume Transfer/Processing Facility pursuant to Title 14 CCR Section 17402(a)(8). The incorporation of this activity may require a revision to the currently issued Solid Waste Facility Permit (Facility No. 30-AB-0019). As part of the revision, the Landfill's Joint Technical Document would need to be updated, including the addition of an In-Vessel Digestion Report, pursuant to Title 14 CCR, Section 17896.15, that meets the requirements of Title 14 CCR, Section 18221.6.1 or a Transfer/Processing Report, pursuant to Title 14 CCR, Section 17403.9, that meets the requirements of Title 14 CCR, Section 18221.6.

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. Please contact the LEA, Kathy Cross, at 714.433.6270 or by e-mail at KCross@ochca.com to discuss solid waste requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the NOP and hopes that this comment letter will be useful to the Lead Agency in preparing the SEIR 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.

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.

NOP of an SEIR for Prima Deshecha Landfill (30-AB-0019)

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Sincerely,



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

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

Kathy Cross, Supervisor
Orange County LEA