



November 22, 2022

Governor's Office of Planning & Research

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

**NOV 23 2022**

**STATE CLEARING HOUSE**

**Subject: SCH No. 2019099059** – Addendum No. 1 to MND for Modifications to Bee Canyon Greenery Composting Operations at Frank R. Bowerman Landfill – Orange County (SWIS No. 30-AB-0469)

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 and Recycling (OCWR), acting as Lead Agency, has prepared and circulated an Addendum (ADM) to the Mitigated Negative Declaration (MND; SCH No. 2019099059) 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 various operational changes to the existing Bee Canyon Greenery Composting Operation at the active Frank R. Bowerman Landfill (SWIS No. 30-AB-0360), located at 11002 Bee Canyon Access Road, Irvine. Operational changes include an increase in daily tonnage from 437 to 876 tons per day (tpd); changes to incoming feedstocks with the addition of food waste and manure (manure will be limited to 175 tpd and food waste will be limited to 5,000 tons per year); an increase in facility size within the landfill boundaries for equipment storage from 30 to 37.3 acres; an increase in truck trips from 22 to 46 truck trips per day; utilization of Covered Aerated Static Pile (CASP) composting technology for reduction of water use and increased air quality emissions controls; clarification of chipping and grinding activities; and compost give away events. There will be no change in hours of operation. The operational changes to the composting operation will allow the County and incorporated cities to divert organic waste materials from landfill disposal, complying with recent State mandates.

### **COMMENTS**

Pursuant to Title 27 California Code of Regulations (27 CCR) Section 21620(a)(4), changes in design or operation, such as an increase in permitted tonnage, increase in permitted acreage,

etc., require a revised solid waste facilities permit pursuant to 27 CCR Section 21665(e). Prior to implementation of these proposed changes, the operator shall submit an application package for a solid waste facilities permit revision pursuant to 27 CCR Section 21570, which shall be processed by the Enforcement Agency (EA) pursuant to 27 CCR Section 21650.

Also note that the Frank R. Bowerman Landfill will need to update their Report of Disposal Site Information to incorporate any of these proposed changes within the landfill boundary pursuant to 27 CCR Section 21600.

### **Solid Waste Regulatory Oversight**

The Orange County Environmental Health Division is the Local Enforcement Agency (LEA) and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Shyamala Rajagopal, at [SRajagopal@ochca.com](mailto:SRajagopal@ochca.com) or 714.433.6270 to discuss the regulatory requirements for the proposed project.

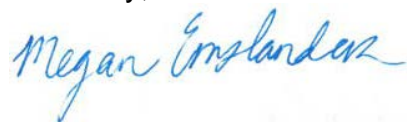
### **CONCLUSION**

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

CalRecycle staff requests copies of any subsequent environmental documents or public notices. If the environmental document is approved during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is approved without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the 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](mailto:Megan.Emslander@calrecycle.ca.gov).

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

Shyamala Rajagopal, Supervisor  
Orange County LEA