

Document: Addendum No. 1 to MND for the Bee Canyon Greenery Composting Operation at the Frank R. Bowerman Landfill

Project Name: **Addendum No. 1 to MND for Bee Canyon Greenery Composting Operation at the Frank R. Bowerman Landfill (SCH #2019099059) – Modifications to Bee Canyon Greenery Operations**

OC Waste & Recycling

Log #: 717

Subject and Purpose of Addendum

The purpose of this Addendum is to comply with the requirements of CEQA by assessing the modification of operations at the Bee Canyon Greenery Composting Operation at the Frank R. Bowerman (FRB) Landfill, and assessing whether this modification will result in the occurrence of any of the conditions in CEQA Guidelines section 15162 calling for a subsequent EIR or Negative Declaration.

The FRB Landfill is a Class III municipal solid waste landfill owned by the County of Orange and operated by OC Waste & Recycling (OCWR). The landfill site is located in unincorporated Orange County, near the City of Irvine. The street address for the landfill is 11002 Bee Canyon Access Road, Irvine, CA 92602. On March 24, 2020, the Orange County Board of Supervisors approved a Mitigated Negative Declaration (MND) (CEQA Log # 675, State Clearinghouse #2019099059) for the construction and operation of a 437 ton per day (TPD) composting facility, called Bee Canyon Greenery at the FRB Landfill (“BCG” or “the project”).

The project analyzed in the Mitigated Negative Declaration (MND) included the following elements:

The construction and operation of a 437 TPD open windrow green waste composting facility located on a 30-acre area of the existing FRB Landfill. Development of the composting facility was planned in two phases, with Phase 1 accepting up to 210 TPD on a 17-acre area, and an expansion to 30-acres accepting up to 437 TPD of material in Phase 2.

The facility currently accepts up to 437 TPD of pre-processed green and agricultural materials. Green material includes but is not limited to tree and yard trimmings, untreated wood wastes, natural fiber product, wood waste from silviculture and manufacturing, and construction and demolition wood waste, and agricultural materials of plant origin. Arriving materials are already pre-processed (chipped and ground and contaminants removed) and consolidated at the material receiving area prior to deployment into windrows. During operations, compost piles are formed in windrows with dimensions no greater than 12 feet high, 20 feet wide and 100 feet in length.

The BCG consists of a material recycling area (tipping floor), composting area, curing area, screening area, finished product load out area, storm water pond and parking. The BCG maintains the same hours of operation as the FRB Landfill – Monday through Saturday, 7 AM –

5 PM, and closed on Sundays and six major holidays. No materials receipt occurs on Sundays, though other operations such as pile monitoring may take place.

Use of heavy equipment for the composting operation includes a windrow turner, two front loaders, a mobile screen, a water truck and a dump truck, and installation of scales. The composting operation requires three employees to operate all of the heavy equipment described above for building, turning, watering and monitoring the compost piles, and to perform other miscellaneous duties. Five full-time employees are needed to provide sufficient staffing for days off, vacations, etc.

At 437 TPD, BCG uses approximately 260,000 gallons of reclaimed water each day for moistening compost piles and for dust control, including the extension of an existing water line for approximately 3,800 feet to connect with a series of ten water tanks painted tan with a combined capacity of 136,500 gallons of reclaimed water, which meet all fire water supply requirements for BCG. The tank dimensions are 14 feet tall and 12 feet wide and are positioned in two vertical rows of five tanks each (i.e., water tank farm). The 130,000-gallon water tank farm maintains at least 60,000 gallons of water at all times for fire water supply.

The finished compost is delivered to end users located within and outside of Orange County. At 437 TPD and using 20-ton per load end dump trucks, the BCG generates approximately 22 new two-way truck trips per day, to take finished compost to end markets.

The purpose of this Addendum No. 1 is to document changes and operational modifications to the existing BCG, hereafter cumulatively referred to as “Phase 1C” or “operational modifications”, which consists of the following:

- Increase the maximum daily tonnage received by the project from 437 TPD to up to 876 TPD.
- Expand feedstock to include manure and food waste in the list of feedstock material in addition to the existing green material as the primary feedstock. In accordance with South Coast Air Quality Management District (SCAQMD) Rule 1133.2, up to 20% of manure by volume can be accepted per pile by composting operations and still be considered a green waste processing facility without further permits and emission control technologies from the SCAQMD; therefore, at a maximum tonnage rate of 876 TPD, BCG can accept up to 175 tons per day of manure and remain in compliance with SCAQMD rules and its existing permits.
- Per SCAQMD Rule 1133.3, a composting facility can accept up to 5,000 tons per year of food waste and still be considered a green waste composting facility without further permits/emission control technologies from the SCAQMD. The existing BCG site permits and supporting documents with CalRecycle/Local Enforcement Agency (LEA) and Regional Water Quality Control Board (RWQCB) would need to be revised to allow the acceptance of manure and food waste.

- Expand the project by approximately 7.3 acres to a total of 37.3 acres (Figure 1). BCG is currently permitted to operate on 30 acres. The BCG will be expanded by 1.5 acres located immediately adjacent to the existing facility, to include the reclaimed water tanks and to accommodate additional area to potentially store equipment, materials, and supplies associated with the BCG. The additional acreage is located on previously disturbed landfill area. Only finished compost or inert materials may be stored in the expanded area. No feedstock, composting, or curing of compost materials will occur within this 1.5-acre parcel located south of the existing compost pad. In addition, the adjacent slopes of the greenery will be included as part of the BCG expanded acreage bringing the total facility acreage to 37.3 acres. The entirety of the expanded BCG will remain within the FRB landfill property and will be located on previously impacted landfill areas.
- Clarify chipping and grinding activities to be performed at the facility. BCG is already permitted under its existing permits to chip and grind, although this was not specifically analyzed in the original MND so this addendum includes updated technical analyses to specifically address operations with chipping and grinding. New equipment for this processing operation would include a chipper/grinder and a conveyor.
- Utilization of new, improved composting technologies and processing methods, namely, Covered Aerated Static Pile (CASP) composting (Figure 1). BCG currently utilizes open windrow composting as the primary means to compost feedstock. As the demand grows for compost production and as OCWR expands feedstock materials beyond green materials, other technologies need to be considered with consideration to operational efficiency and maximization of processed tonnage with space constraints. OCWR is considering other technologies to better accommodate these changes. The CASP technology utilizes a tarp system equipped with a blower to induce forced aeration for the Process to Further Reduce Pathogens (PFRP) while also serving as an emission control technology under SCAQMD rules. The CASP technology has the ability to reduce the PFRP timeframe, conserve water, reduce odors, and reduce vectors as compared to open air windrow composting. In Phase 1C, OCWR will utilize the CASP system technology in addition to traditional open-air windrow composting at BCG. However, open windrow will not occur in quantities larger than already permitted in Phase 2. The CASP system will use a mechanical cover winder to apply and remove the covers from the compost piles, therefore new equipment added for the operation will include a tarp cover machine.
- Allow for public compost give-away events. As BCG produces finished material, the majority of the product will be hauled offsite for beneficial reuse. Occasionally, OCWR may sponsor community compost give away to local businesses and residents, anticipated to occur at a maximum of once per month. These events will offer free compost to interested members of the public, provide an opportunity to educate the community on the benefits of composting, and support the state's goal to recycle organic materials and conserve landfill capacity, as articulated in Senate Bill (SB) 1383, Assembly Bill (AB) 1594, and AB 939.

Standards for Preparing an Addendum

California Code of Regulations Title 14 (“CEQA Guidelines”), Section 15164 “Addendum to an EIR or Negative Declaration”, states the following:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- [. . .]
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

CEQA Guidelines Section 15162(a) “Subsequent EIRs and Negative Declarations”, states the following:

- (a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

Changes to MND for Bee Canyon Greenery Composting Operation at the Frank R. Bowerman Landfill

Changes to MND for the BCG Composting Operation at FRB Landfill, MND-Initial Study Sections 1.5 and 1.6 are required, as shown below, with added text shown in underline, and removed text in ~~strikeout~~.

Section 1.5 Project Need

The implementation of the Bee Canyon Greenery at the FRB Landfill will allow OCWR to compost a maximum of ~~437~~ 876 TPD of PGM and processed agricultural material at the FRB Landfill, thereby assisting the state, Orange County cities and the County unincorporated area in meeting SB 1383 and AB 1594 requirements for organic waste recycling.

Section 1.6 Project Description – *Proposed Project – Bee Canyon Greenery*

Following implementation of Phases 1 and 2, OCWR will implement Phase 1C, which will include various modifications to the BCG operations. These changes will include: increasing the maximum daily tonnage received at the facility to up to 876 TPD; use of additional feedstock materials; expansion of the facility by approximately 7.3 acres to a total of 37.3 acres to allow for additional appurtenant equipment storage; chipping and grinding activities; utilization of new composting technologies and processing methods to streamline the process, reduce processing times, increase throughput, and reduce environmental impacts; and allow for compost give away events. These changes are described in further detail below.

Feedstock: Expand feedstock to include manure and food waste. As the demand grows for compost production to meet organics recycling requirements set by SB 1383 and AB 1594, OCWR may add additional feedstock types to composting operations, including manure and food waste along with green waste material as the primary feedstock. Orange County has a number of equestrian communities that generate horse manure, and acceptance of this material at BCG would offer a solution other than landfilling for manure to help meet organics diversion requirements set by SB 1383. In accordance with SCAQMD Rule 1133.2, up to 20% of manure by volume can be accepted per pile by a composting operation and still be considered a green

waste processing facility without further permits and emission control technologies from the SCAQMD. Thus, at the maximum tonnage rate of 876 TPD, BCG can accept up to 175 TPD of manure. Per SCAQMD Rule 1133.3, a facility can accept up to 5,000 tons per year of food waste and still be considered a green waste composting facility without further permits/emission control technologies from the SCAQMD; additional quantities would require additional permitting. The site permits and supporting documents with CalRecycle/LEA and RWQCB for BCG will need to be revised to allow the acceptance of additional feedstock types including manure and food waste.

Facility Acreage: Phases 1 & 2 permit BCG to operate on 30 acres; the facility boundary accommodates an all-weather surface for the receipt and handling of feedstock, active composting, curing, and storage of finished product and ancillary infrastructure such as a stormwater retention basin, fire prevention water lines, fire hydrants, fire lanes, J-stands, and storage of equipment. In Phase 1C, OCWR will expand the facility acreage by 1.5 acres to include the reclaimed water tanks and to use the expanded area to potentially store equipment, materials, and supplies associated with the project. Only finished compost or inert materials may be stored in this expanded area, and no feedstock, composting, or curing of compost materials will occur within this 1.5-acre parcel located south of the existing compost pad. In addition, the adjacent slopes of the greenery will be included as part of the facility acreage bringing the total facility acreage to 37.3 acres. The entirety of this increased acreage is within the property of the existing landfill and is on previously disturbed landfill areas that are not currently being utilized for landfilling activities.

Chipping and Grinding: Chipping and grinding is an inherent aspect of a green materials composting operation. Most facilities chip and grind green waste prior to placement in windrows. For project Phases 1 and 2, the green material arrives pre-processed which allows the feedstock to be immediately placed in windrows. Through composting the green material is further reduced in size through microbial degradation. The finished compost is then screened to meet product specifications which results in the generation of oversize particles referred to as “overs.” The overs can be further composted or converted to a mulch product which requires the overs materials to be mechanically reduced in size through chipping and grinding. Additionally, as OCWR expands its resource recovery activities, chipping and grinding will allow wood waste to be removed from the waste stream from landfill operations that could be further chipped and grinded for either composting operations or to produce mulch. New equipment for this processing operation would include a chipper/grinder and a conveyor. The Phase 1 & 2 site permit already permits chipping and grinding, but previously prepared analyses will be updated to ensure no change to potential impacts associated with chipping and grinding operations.

Utilization of new composting technologies: In Phase 1C, OCWR will utilize new composting technologies to streamline composting process, reduce processing times, increase potential throughput, and potentially reduce environmental impacts, namely, Covered Aerated Static Pile (CASP) technology. However, as new and better technologies become available in the future, OCWR may also consider implementing additional options. Phases 1 & 2 of BCG will continue to utilize open windrow composting as the primary means to compost feedstock. As the demand grows for compost production to meet organics recycling requirements pursuant to state regulations, and as OCWR expands feedstock materials beyond green materials, other technologies, such as CASP technology, need to be considered to meet demand and increase the efficiency of the BCG Composting Operation.

CASP technology utilizes a tarp system equipped with a blower to induce forced aeration for the Process to Further Reduce Pathogens (PFRP) while also serving as an emission control technology under SCAQMD rules. CASP technology has the ability to reduce the PFRP timeframe, conserve water, reduce odors, and reduce vectors as compared to open air windrow composting. In Phase 1C, CASP system technology in addition to traditional open-air windrow composting will be utilized at BCG. Conceptual layouts for the CASP system at BCG provide for approximately 92 CASP piles and approximately 114 curing piles, which would result in the ability to receive approximately 876 TPD of feedstock.

For the CASP composting system 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. During the active composting phase, the compost remains covered and is then uncovered during the curing phase. Temperature is monitored through automated sensors throughout the entire process. Once a phase is complete the aeration piping is removed from the pile and the compost is moved to the pile designated for the next phase (i.e., moved from an active phase pile to a curing phase pile). Once the compost completes a minimum of 21 days in the CASP active phase and meets the PFRP requirements, it will require a minimum of 28 days of curing before it can be stored or transported off-site. The dimensions of the covered aerated static piles will be 12 feet high, 22 feet wide and 88.5 feet long. Since there is no physical turning, CASP composting requires careful monitoring to ensure that the outside of the pile heats up as much as the core. The same heavy equipment used for open windrow composting would also be used to construct the compost piles for CASP composting. The CASP system will use a mechanical cover winder to apply and remove the covers from the compost piles, therefore new equipment added for the operation will include a tarp cover machine. There is electrical power available at BCG; therefore, the blowers will be operated via the existing electrical system. Provisions for an electrical generator connection to provide back-up power to the system is provided which can be utilized in emergency situations. The existing reclaimed water source extended as part of Phases 1 & 2 will also serve Phase 1C. The existing water source fills a series of tanks located at the BCG that provides water for composting activities and fire prevention. It is anticipated CASP composting operations will require approximately 84,600 to 116,730 gallons of water per day for operation as compared to the Phase 1 & 2 open windrow operation, which is estimated to use up to 260,000 gallons per day. The Phase 1, 2 and 1C operations are sequential, and estimated water use is not cumulative between phases. Thus, Phase 1C CASP composting will result in an overall reduction in the daily water usage at the facility.

As with Phases 1 & 2, the BCG CASP system will be designed and operated to meet all Orange County Fire Authority (OCFA) requirements. This will include but not be limited to the spacing between CASP piles; the number, width, and length of fire lanes; and the distance of the CASP piles and material storage areas to flammable vegetation. In addition, the project already has fire hydrants in place. As with Phases 1 & 2, OCWR will provide an updated plot plan to OCFA for review and approval that contains the following information:

- A Fire Master Plan showing all driveways and parking areas constructed of all-weather surface roads with a minimum of 28 feet in width.
- Location of all water sources (fire hydrants).
- Location of all other hazards (i.e., flammable, combustible, or LPG tanks).

- Fuel modification plan.

To provide the required fire flow to the composting operation, the minimum fire flow shall be no less than 500 gallons per minute (GPM) at 20 Pounds per Square Inch Residual (PSIR) for a minimum of two (2) hour duration. This will be provided by tank farm located at the south end of the compost facility. The water flow and pressure will be provided by the elevation difference between the bottom of the tank and the composting deck.

These modifications will require revisions to the existing site permits and supporting documents with CalRecycle/LEA and RWQCB, and will also require submission to and approval by the SCAQMD.

Compost Give Away: As BCG produces finished material, the majority of product will be hauled offsite for beneficial reuse. Occasionally, OCWR may sponsor community compost give away to local businesses and residents, anticipated to take place a maximum of once a month. These events will offer free compost to interested members of the public, provide an opportunity to educate the community on the benefits of composting, and support the state's goal to recycle organic materials and conserve landfill capacity as set forth in SB 1383 and AB 939. No additional permitting is required to allow for this activity. BCG is co-located at the FRB Landfill. Pursuant to the Landfill's Solid Waste Facility Permit, the landfill does not accept refuse from the general public. Only commercial haulers and transporters with a business license are permitted to utilize the landfill for disposal. The BCG is a separate facility from FRB and operates independent from landfill operations.

Analysis Confirming that an Addendum is the Appropriate CEQA Document for Proposed Project

Included below is an analysis of whether an Addendum is the appropriate CEQA documentation for the modification of operations at the BCG Composting Operation at the FRB Landfill. The analysis summarizes the conclusions for each environmental topic analyzed in the Final MND for BCG Composting Operation Facility at the FRB Landfill and whether there would be a change in the significance conclusion for each environmental topic as a result of the modified project.

Aesthetics

The original MND for the BCG Composting Operation found that the project would result in less than significant impacts with mitigation to public views and no impact to a scenic vista or scenic resources. To mitigate potential impacts to aesthetics/views, Mitigation Measure (MM) AS-1 was incorporated into the project, which specified that the new water tanks required for the project would be painted with non-reflective paint in a tan or a similar color to blend in with the adjacent topography.

MM AS-1 has been implemented and the existing water tanks will continue to be painted in the tan color to blend with surrounding topography. The operational modifications to the BCG will not result in the development of any new structures or addition of any new water tanks or other infrastructure. Views of the facility will remain substantially the same as the existing operation and will result in no change from the existing visual character of the site which includes an

existing, active composting operation. As such, operation of the recycling facility would not result in a significant change to the existing aesthetics or views of the area, which already includes an existing, active landfill.

The original MND found that the BCG Composting Operation would not result in any significant light and glare impacts. The modifications to the operation will not result in a change to the existing facility operational hours and will not utilize any new or additional artificial lighting, resulting in no change to this significance determination.

For the same conclusions found in the original MND, the modification of operations at the BCG will not result in any significant impacts to aesthetics, with MM AS-1 included.

On the basis of substantial evidence in light of the whole record, the modifications of operations at the BCG Composting Operation will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Agriculture & Forestry Resources

The original MND for the BCG Composting Operation found that the project would result in no impacts to agriculture and forestry resources, as the project is located within an existing landfill, and does not affect Farmlands listed as “Prime”, “Unique” or of “Statewide Importance” as shown on the State Farmland Mapping and Monitoring Program, nor conflict with Williamson Act contracts nor does it involve the conversion of farmlands to a non-agricultural use. The project also does not result in any conflicts with forest land, timberland or Timberland Production areas nor does it result in the loss of forest land or conversion of forest land to non-forest use. For the same conclusions found in the original MND, the operational modifications at the BCG will not result in any significant impacts to agriculture and forestry resources.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Air Quality

The original MND for the BCG Composting Operation included an air quality and health risk impact analysis which concluded that construction and operation of the project would result in less than significant impacts to air quality. Although the analysis concluded that no significant impacts would occur, the OCWR added various Project Design Features and Operational Control Measures (PDF & OCM) to the project to further reduce the project’s less than significant impacts, which will remain in effect with the operational modifications.

In consideration of the modifications to the operations at BCG, an updated air quality/greenhouse gas/health risk assessment was prepared by LSA (included as Appendix A to this Addendum) to fully assess all project modifications, including construction and operation, new equipment, and

changes to daily vehicle trips associated with the increase in daily tonnage. The updated study concludes that the operational modifications would not conflict with or obstruct the implementation of an applicable air quality plan, nor result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. The updated assessment concluded that the operational modifications would not result in significant emissions that would affect nearby sensitive receptors nor a significant change to air quality impacts for either short-term construction or long-term operation of the BCG.

The composting operation is located at an existing, active landfill. Prior to 2020 when SB 1383 came into effect, FRB received approximately 850 TPD of incoming green waste. Trucks that were already bringing green waste material to the landfill are now instead diverted to the composting operation. The existing BCG generates approximately 22 truck trips per day for trucks taking finished compost to end markets. At an increased maximum daily tonnage of 876 TPD, and using 20-ton per load end dump trucks, the BCG will generate approximately 46 two-way truck trips per day, with two new truck trips to bring additional material (an additional 26 TPD over the 850 TPD that were already incoming to the landfill prior to SB 1383), and up to 44 truck trips to haul finished compost to end markets (this is inclusive of the 22 truck trips already occurring for the existing operation). The updated air quality analysis concluded that these 46 vehicle trips per day would result in an insignificant increase in air emissions when compared to the existing environmental setting of the FRB Landfill operation that generates approximately 655 two-way vehicle trips per day.

Heavy equipment currently used at BCG includes include a windrow turner, two front loaders, a mobile screen, a water truck and a dump truck. With the operational modifications, OCWR will also use a chipper/grinder, a conveyor, and a tarp cover machine. The blowers for the CASP system will be operated with electrical connection existing at the facility at the time of CASP operation. The updated air quality analysis concluded that the additional equipment 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 associated with the active FRB Landfill that accepts approximately 8,000 tons of solid waste per day and approximately 2,000 tons of exempt wastes per day.

The operational modifications to BCG Composting Operation will also result in no change in terms of exposing sensitive receptors to substantial pollutant concentrations or result in any human health risks. The composting operation will not result in substantial pollutant concentrations and the closest sensitive receptors are residential areas in Portola Springs that are located approximately 3,500 feet south of the project site.

The original MND included a quantitative odor analysis of the BCG Composting Operation, which concluded that the composting operation would not result in any significant odor impacts to the nearest sensitive receptors. In consideration of the modifications to the operations at BCG, an updated odor risk assessment was prepared by SCS Engineers (included as Appendix B to this Addendum) to fully assess all project modifications including additional feedstock materials, increased tonnage, and use of new composting technologies. The updated analysis concluded that

the operational modifications to BCG would result in no significant odor impacts. In addition, OCWR has implemented an Odor Impact Minimization Plan (OIMP) with the existing BCG operation, which will continue to be implemented with the operational modifications. All PDF & OCM incorporated into the existing operation will also continue to be implemented.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Biological Resources

The original MND for the BCG Composting Operation found that the project would result in no impact to biological resources. The BCG is located entirely on Phase V-D of the FRB Landfill that is underlain completely by a soil stockpile and heavily disturbed. A large portion of the site is also underlain by refuse underneath the soil stockpile. There will be no disturbance to biological resources and no impacts to any sensitive plant or animal species. The project will also not result in any impacts to riparian habitat or wetlands. The project will not interfere in any way with the movement of any migratory species or impede the use of native wildlife nursery sites. In addition, the proposed project will not result in the removal of any trees, so there will be no conflicts with the County's tree protection ordinance. While the project is located in the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) for the Central and Coastal Subregions of Orange County, the project is located on the FRB Landfill site, which is an existing permitted use in the NCCP/HCP. The project will not result in the removal of any coastal sage scrub or any other native habitat. The project is consistent with NCCP/HCP policies and therefore no impacts will occur. The expanded facility boundary included in Phase 1C remains within areas of the landfill that are already completely disturbed and underlain by refuse or soil stockpile. For the same reasons found in the original MND, the modifications to operations at the BCG will not result in any significant impacts to biological resources.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Cultural Resources

The original MND for the BCG Composting Operation found that the project would result in no impacts to historical, archaeological, or paleontological resources since the project is located entirely on a soil stockpile that is primarily underlain by refuse and is already heavily disturbed. The modifications to the BCG Composting Operation will not disturb soils or ground outside of the footprint of the existing FRB landfill and will therefore not impact historical, archaeological, or paleontological resources. For the same reasons found in the original MND, the modifications to operations at the BCG will not result in any significant impacts to cultural resources.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Energy

The original MND for the BCG Composting Operation found that the project would result in no impacts to energy resources. In consideration of the modifications to the operations at BCG, an updated Energy assessment was prepared by LSA (included in Appendix A). Based on the updated assessment, the BCG and operational modifications will not result in the wasteful, inefficient or unnecessary consumption of energy resources during project construction or operation. The BCG is located on the FRB Landfill which is an existing landfill operation. Green waste that will be composted was already being brought to the landfill for disposal prior to the implementation of SB 1383, thereby resulting in a minimal increase in energy consumption. Based on anticipated fuel consumption, the proposed project would be a minimal fraction of fuel consumption in Orange County and therefore would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. In addition, because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. For the same reasons identified in the original MND, the modifications to operations at the BCG will not result in any significant impacts to energy resources.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Geology and Soils

The original MND for the BCG Composting Operation found that the project would result in less than significant impacts to geology and soils. The original MND also concluded that the project would have no impacts with regard to wastewater disposal and paleontological resources. No known active faults cross or trend toward the FRB Landfill site. Seismic risk assessments prepared for the FRB landfill determined negligible risk for permanent displacement, liquefaction, lateral spreading, or subsidence. The BCG is not located near known landslides at the FRB Landfill, nor would the project site be affected in any way by known landslides. The underlying geologic formations and soils at the FRB Landfill are considered to have low expansive potential. BCG Composting Operation, including modifications, will not result in the development or use of septic or wastewater treatment systems, and the project area is located entirely on a previously disturbed soil stockpile, and therefore no impacts to wastewater with regard to wastewater disposal or paleontological resources will occur. For the same reasons found in the original MND, the modified project will not result in any significant impacts to geology and soils.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Greenhouse Gas Emissions

The original MND for the BCG Composting Operation found that the project would have less than significant impacts to greenhouse gas emissions. The greenhouse gas emissions impact analysis prepared for the original MND for BCG concluded that the project would not generate greenhouse gas emissions either directly or indirectly that may have a significant impact on the environment, nor would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The analysis also found that the new truck trips and equipment associated with the composting operation would result in an insignificant increase when compared to the existing environmental setting of the active FRB landfill. Pursuant to AB 32 and other laws and regulations mentioned in the greenhouse gas emissions impact analysis, composting is viewed as a positive step for reducing greenhouse gas emissions in California by diverting some organic waste materials from landfills that would otherwise generate methane, which is a greenhouse gas.

The updated study prepared by LSA (Appendix A to this Addendum) analyzed the effect that the modified operations at BCG would have. That study concludes that the operational modifications would be lower than significance thresholds, would not be cumulatively considerable, and would therefore not result in a new significant impact. In addition, for the same reasons described in the original MND, the operational modifications would also not conflict with any greenhouse gas reduction plans.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent EIR or ND is not required.

Hazards & Hazardous Materials

The original MND for the BCG Composting Operation found that the project would have less than significant impacts to hazards and hazardous materials. The BCG, including operational modifications, will not result in the use or transport of hazardous materials. The operation does and will continue to generate leachate from the composting process which is and will continue to be collected and reused in the composting operation equipment. Equipment used in the composting operation is and will continue to be properly maintained so that there are no major spills or leaks of diesel fuel, oil or other fluids used in the standard operation of the heavy construction equipment that will be used at the composting operation. A spill response plan has been prepared and will continue to be implemented in compliance with NPDES requirements. The BCG is not located within one-quarter mile of an existing or proposed school, is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and is not located within an airport land use plan area or within two miles of an airport. The original MND determined that the project

does not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project is located within a high fire hazard area, but the original MND concluded that the project will generate a less than significant impact with respect to wildland fires as the operation is located on the FRB landfill which is already completely disturbed, proper operational practices and fire control practices will be utilized to minimize fire risk, and the operation is, and modifications thereto will be, designed and maintained to meet all OCFA requirements. In addition, the project included various PDF & OCM to further reduce the project's less than significant impacts, which will continue to be implemented with the operational modifications. For the same reasons identified in the original MND, the modifications to operations at the BCG will not result in any significant impacts to hazards and hazardous materials.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Hydrology and Water Quality

The original MND for the BCG Composting Operation found that the project would result in less than significant impacts to hydrology and water quality.

The BCG Composting Operation generates leachate that must be captured. During storm events, surface water runoff and leachate is collected on-site in a lined pond and reused within the composting operation. Collected runoff and leachate is not discharged to the storm water drainage system and will not degrade ground or surface water quality. The project, including operational modifications, will not result in a substantial increase in the rate or amount of surface water runoff nor result in substantial erosion or siltation on- or off-site, as runoff and leachate are collected on site and reused on site.

The project including operational modifications will not result in the violation of any water quality standards or waste discharge requirements. OCWR has applied for coverage under Order WQ 2015-0121-DWQ, General Waste Discharge Requirements for Composting Operations and coverage for Construction Activities and Industrial Activities under the National Pollutant Discharge Elimination Systems Permit (NPDES), issued by the California Regional Water Quality Control Board, Santa Ana Region (RWQCB). OCWR has also implemented a project specific Storm Water Pollution Prevention Plan (SWPPP) consisting of several Best Management Practices (BMPs) to control surface water runoff, erosion and siltation at the project site during construction and operation which will be modified accordingly to account for operational modifications.

The project, including operational modifications involves no drilling or deep grading and would not result in the depletion of groundwater supplies and would not interfere with groundwater recharge. The project will not result in the alteration of the course of a stream or river. The project site is not located within a 100- or 500-year flood zone (Zone X) as designated by the Federal Emergency Management Agency. The project will not expose people or structures to flooding risks. The project site is not located within a dam inundation area nor in close proximity to the Pacific Ocean or any large inland water bodies, and therefore will not result in any impacts

associated with seiche, tsunami or mudflow. The project, including modifications, will also not result in the obstruction of any water quality control plan or sustainable groundwater management plan.

To further reduce the project's less than significant impacts, OCWR included various PDF & OCM, which will continue to be implemented with the operational modifications in Phase 1C. For the same reasons found in the original MND, the modifications to operations at the BCG will not result in any significant impacts to hydrology and water quality.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Land Use & Planning

The original MND for the BCG Composting Operation found that the project would result in no impacts to land use and planning. The project site, including all modifications is located within the FRB Landfill. The FRB Landfill is located on unincorporated County property to the north of the City of Irvine (within the City's Sphere of Influence) in an area known as Bee Canyon. The Orange County General Plan designation for the FRB Landfill site is 4LS (Public Facilities; Landfill Site). Because the property is owned by the County of Orange, the project is exempt from the provisions of the Orange County Zoning Code, pursuant to Orange County Codified Ordinance, Ordinance No. 99-02, Section 2, Section 7-9-20(i). The modifications to project operations will not physically divide an established community, nor will they conflict with any land use plans, policies or ordinances adopted for the purpose of avoiding or mitigating an environmental effect. For the same reasons set forth in the original MND, the modifications to operations at the BCG will not result in any significant impacts to land use and planning.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Mineral Resources

The original MND for the BCG Composting Operation found that the project would result in no impacts to mineral resources. The FRB Landfill site does not contain mineral resources that are either designated as important to the State of California or are considered to be of local importance. In addition, the landfill site is not designated as a mineral resource recovery facility. For the same reasons set forth in the original MND, the modifications to operations at the BCG will not result in any significant impacts to mineral resources.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this

significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Noise

The original MND for the BCG Composting Operation included a noise analysis which concluded that construction and operation of the project would result in less than significant impacts to noise. Although the analysis concluded that no significant impacts would occur, OCWR added various PDF & OCM to the project to further reduce the project's less than significant impacts, which will remain in effect with the operational modifications included in Phase 1C.

In consideration of the modifications to the operations at BCG, an updated noise assessment was prepared by LSA (included as Appendix C to this Addendum) to fully assess all proposed modifications, including construction and operation, new equipment, and changes to daily vehicle trips associated with the increase in daily tonnage. Project modifications include operation of the CASP system with blowers to aerate the piles and use of new equipment including a chipper/grinder, conveyor, and tarp machine. The updated study concludes that the operational modifications would result in no significant increase or change to noise associated with construction or operation of Phase 1C.

As with the original project analyzed under the MND, the operational modifications do not result in a change to project operational hours, and all operations will take place during the daytime and will not exceed standards established by noise ordinances for the City of Irvine or County of Orange. The operational modifications will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance and will not result in the generation of excessive ground borne vibration or ground borne noise levels. For the same reasons set forth in the original MND, and as demonstrated by the updated noise assessment, the modifications to operations at the BCG will not result in any significant noise impacts.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Population & Housing

The original MND for the BCG Composting Operation found that the project would result in no impacts to population and housing. The modifications to operations at the BCG will take place at an existing landfill site and will not result in the displacement of existing people, housing or businesses as a result of the project. For the same reasons set forth in the original MND, the modifications to operations at the BCG will not result in any significant impacts to population and housing.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Public Services

The original MND for the BCG Composting Operation found that the project would result in no impacts to public services. The modifications to operations at the BCG will not result in the increased need for public services such as police, fire, or emergency medical services, the building of new schools or parks or the need for either expanded or enhanced public facilities and services. For the same reasons set forth in the original MND, the modifications to operations at the BCG will not result in any significant impacts to public services.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Recreation

The original MND for the BCG Composting Operation found that the project would result in no impacts to recreation since the project would not result in the development of any new residential, commercial, or industrial developments that would increase the need for new recreational facilities or increase the use of existing recreational facilities. In addition, the BCG operation would not directly or indirectly impact any existing recreational facilities. For the same reasons identified in the original MND, the modifications to operations at the BCG will not result in any significant impacts to recreation.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Transportation/Traffic

The original MND for the BCG Composting Operation included a transportation and limited scope analysis which concluded that construction and operation of the project would result in less than significant impacts to transportation and traffic.

In consideration of the modifications to the operations at BCG, an updated transportation and traffic assessment was prepared by LSA (included as Appendix D to this Addendum) to fully assess all proposed modifications, including changes to daily vehicle trips associated with the increase in daily tonnage. The updated study concludes that the operational modifications would result in no associated significant increase or change to transportation or traffic.

The composting operation is located at an existing, active landfill. Prior to 2020, when SB 1383 came into effect, FRB received approximately 850 TPD of incoming green waste. Trucks that were already bringing green waste material to the landfill are now instead diverted to the composting operation. The existing BCG generates approximately 22 truck trips per day for trucks taking finished compost to end markets. At an increased maximum daily tonnage of 876 TPD, and using 20-ton per load end dump trucks, the BCG will generate approximately 46 two-way truck trips per day, with two new truck trips to bring additional material (an additional 26 TPD over the 850 TPD that were already incoming to the landfill prior to SB 1383), and up to 44 truck trips to haul finished compost to end markets (this is inclusive of the 22 truck trips already occurring for the existing operation). This amounts to 194 average daily trips (ADT), including 20 trips in the a.m. peak hour (10 inbound and 10 outbound) and 25 trips in the p.m. peak hour (10 inbound and 15 outbound), in Passenger Car Equivalents (PCEs). The updated transportation and limited scope traffic analysis concluded that the BCG with operational modifications will not negatively affect the design or operation of the surrounding roadway system. An evaluation of intersection Level of Service (LOS) shows that the addition of project traffic, with modified operations, would not negatively affect the study area intersections and is not considered significant.

Regarding Vehicle Miles Travelled (VMT), according to the City of Irvine's Traffic Study Guidelines (November 2021), if a project results in a net increase of 250 or fewer ADT, then the project is screened out from a VMT; as the project would generate 194 ADT, it meets the screening criteria for VMT. According to the County's Final Draft Guidelines for Evaluating Vehicles Miles Traveled under CEQA, public services and facilities that support community health, safety, or welfare are screened from a VMT analysis. Such facilities include fire stations, police/sheriff stations, jails, community centers, refuse stations, and landfills (i.e., Frank R. Bowerman Landfill). These facilities are already a part of the community, and as a public service, the VMT is accounted for in the existing regional average. Therefore, the proposed operational modifications to BCG also meets the County's screening criteria for VMT.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Tribal Cultural Resources

The original MND for the BCG composting operation found that the project would result in no impacts to tribal cultural resources as the project area is completely underlain by a soil stockpile and is entirely disturbed. Therefore, there is no possibility that tribal cultural resources will be present or will be disturbed during either the construction or operational phases of the project.

The modifications to the project operations will result in an expansion of the facility boundary. However, the entirety of the project area will remain on landfill areas that are entirely disturbed. Therefore, there will continue to be no possibility of impacts to tribal cultural resources. For the same reasons set forth in the original MND, the modifications to operations at the BCG will not result in any significant impacts to tribal cultural resources.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Utilities and Service Systems

The original MND for the BCG Composting Operation found that the project would have a less than significant impact to water supply, and no impact to other utilities and service systems. The original MND identified that the composting operation would require significant volumes of water to facilitate the composting process, to regulate temperatures, and to prevent fires, as well as for dust control. For the 437 TPD composting operation, it is estimated that approximately 260,000 gallons of reclaimed water are needed each day for moistening the compost piles and for dust control. Altogether, the FRB Landfill operation and the BCG were estimated to use approximately 320,000 gallons of reclaimed water per day. A water infrastructure and availability study was prepared in connection with the original MND which concluded that the water purveyor, the Irvine Ranch Water District, has sufficient infrastructure and supply to accommodate the project's projected daily water demand. With the proposed use of CASP, which allows for increased throughput of materials while conserving water through the use of covered piles, even at a higher daily tonnage, it is anticipated that the operation will require up to 116,730 gallons per day of water for daily operations. This amount is not cumulative with previous Phases 1 and 2. Phases 1, 2 and 1C are sequential, therefore the anticipated water use in Phase 1C will with CASP will be less than the estimated 260,000 gallons per day that are currently used at the greenery. Altogether, the FRB Landfill operation and BCG will use approximately 176,730 gallons of reclaimed water per day with the modified BCG operations. This is an overall reduction in daily water usage, and as such the existing infrastructure and supply remains sufficient to accommodate the project. In addition to requiring water, the blowers for the CASP system will require electrical power; there is existing electrical power available at the FRB landfill; therefore, the blowers will be operated via the existing electrical system. Therefore, the modification of operations at the BCG will not result in any significant impacts to utilities and service systems.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Wildfire

The original MND for the BCG Composting Operation found that the project would result in less than significant impacts to wildfire, with no impacts to an adopted emergency response plan or emergency evacuation plan, potential for exacerbation of wildfire risks, nor potential risks associated with post-fire instability or drainage changes.

The BCG is located within a high fire hazard area, as designated by the *County of Orange General Plan*. However, the BCG is located on the active FRB Landfill that is completely disturbed. No

native vegetation is located in close proximity to the facility operational areas, and the potential for the compost piles to generate fires is minimized by the implementation of proper compost practices. In the event that a compost pile does catch on fire, the fire will be immediately put out (i.e., smothered) by the loaders or water trucks at the composting operation. The BCG has been, and all future modifications will also be, designed and operated to meet all Orange County Fire Authority (OCFA) requirements. The existing water storage tanks and hydrants already in place for BCG will continue to service the Phase 1C operation, which maintain a minimum amount of water at all times for fire water supply, and existing infrastructure continues to meet all requirements for minimum fire flow pressure, as confirmed by a water infrastructure study prepared at the time of preparation of the original MND. As the operation phases are sequential and the CASP operation will utilize less water in daily operations overall, the existing infrastructure and supply remains sufficient to accommodate sufficient capacity for both daily operations and fire suppression. For the same reasons set forth in the original MND, the modifications to operations at the BCG will not result in any significant wildfire impacts.

On the basis of substantial evidence in light of the whole record, the modification of operations at the BCG Composting Operation at the FRB Landfill will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Basis for Addendum

The modifications to the project will result in various modifications to operations at the existing Bee Canyon Greenery Composting Facility Operation at the Frank R. Bowerman Landfill site. These modifications do not propose substantial changes to the project which would require major revisions to Mitigated Negative Declaration (SCH# 2019099059). The changes will not result in any new significant environmental impacts for the Bee Canyon Greenery Composting Facility Operation at the Frank R. Bowerman Landfill, or a substantial increase in the severity of any previously identified significant effects, as analyzed in the Mitigated Negative Declaration, and there is no new information of substantial importance to the project which was not or could not have been known when the Mitigated Negative Declaration was adopted. Therefore, on the basis of substantial evidence in light of the whole record, and as discussed in the environmental analysis included above, in accordance with Public Resources Code section 21166 and CEQA Guidelines sections 15162 and 15164, a subsequent EIR or ND is not required.