



February 6, 2020

Governor's Office of Planning & Research

FEB 06 2020

STATE CLEARINGHOUSE

John Arnau, CEQA Manager
OC Waste & Recycling
601 N. Ross Street, 5th Floor
Santa Ana, CA 92701

Subject: SCH No. 2020019030 – Draft Mitigated Negative Declaration for Capistrano Greenery Composting Operation at Prima Deshecha Landfill, Facility Number 30-AB-0468 – Orange County

Dear Mr. Arnau:

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 County of Orange, OC Waste and Recycling (OCWR) Department, acting as Lead Agency, has prepared and circulated a Draft Mitigated Negative Declaration (MND) 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 proposes to implement a composting operation at the Prima Deshecha Sanitary Landfill (Facility No. 30-AB-0019) called the Capistrano Greenery Composting Operation (proposed project). The proposed project will receive a maximum of 204 tons per day (TPD) of processed green waste, processed agricultural material and manure. The composting operation will be located on an 18.6-acre area of the landfill that is completely disturbed. The proposed project will allow OCWR to assist Orange County cities and the county unincorporated area in meeting state recycling mandates for the recycling of organic waste materials.

The 1,530-acre Prima Deshecha Landfill site is located in San Juan Capistrano, unincorporated Orange County, and San Clemente. The street address for the Prima Deshecha Landfill is 3225 Avenida La Pata, San Juan Capistrano; which is currently zoned as exempt and designated as Public Facilities and Landfill Site per the General Plan. The project site is surrounded primarily by open space, with some residential development.

Beginning in May 2018, OCWR implemented a demonstration pilot project tiered as an Enforcement Agency Notification (EAN) Green Material Composting Operation on an existing landfill area of the Prima Deshecha Landfill. The EAN is located on an approximate 1-acre area within Waste Management Unit 1 of the landfill area. This area of the landfill is not currently being used for active landfill disposal. Material feedstocks that have been composted include source separated residential curbside green waste, commercial green waste, processed green waste and wood waste. These materials were already being delivered to the landfill. The pilot project does not have more than 60 tons (92 cubic yards) of material onsite at any one time or process more than 250 tons of material per year. The pilot project will continue at Prima Deshecha Landfill, so that OCWR can continue to learn about composting, until such time as the proposed project is fully permitted and operational.

COMMENTS

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, Kathy Cross, at 714.433.6270 to discuss the regulatory requirements for the proposed project.

CONCLUSION

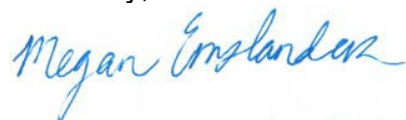
CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the MND and in carrying out their responsibilities in the CEQA process.

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.

Sincerely,



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

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

Kathy Cross, Supervisor
Orange County LEA