



July 24, 2020

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Alexander MacDonald
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Governor's Office of Planning & Research

Jul 24 2020

STATE CLEARINGHOUSE

Subject: SCH No. 2020060543 – Initial Study and Mitigated Negative Declaration for Aerojet Waste Consolidation Unit Project – Sacramento County

Dear Mr. MacDonald:

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 Central Valley Regional Water Quality Control Board (CVRWQCB), acting as Lead Agency, has prepared and circulated a Notice of Intent (NOI) of a Draft Initial Study and Mitigated Negative Declaration (Draft IS/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.

The Proposed Project is located on an Aerojet-Rocketdyne Inc. (Aerojet) owned ±250-acre parcel referred to as the White Rock North Dump (WRND) parcel. The WRND parcel includes a ±100-acre pre-regulation "dump" and is within Aerojet's access-controlled property located south of State Highway 50 between the Cities of Rancho Cordova and Folsom in Sacramento County, CA. The Project site address is 12353 White Rock Road, Sacramento County, CA. 95742. The surrounding properties are primarily vacant/undeveloped. The Prairie City Off-Highway Vehicle Park is located approximately 0.64 mile east, and Teichert Aggregates is located approximate one mile south. The nearest cities include the Rancho Cordova, approximately 1.1 miles west, and Folsom, approximately 1.7 miles northeast. The nearest existing residential use includes a single-family subdivision located in the City of Rancho Cordova approximately 1.6 miles to the southeast.

The proposed project would occur in two phases. Phase one would allow for construction, cap, and closure of a Class II Landfill to be known as the Aerojet Waste Consolidation Unit for up to 1,000,000 cubic yards (CY) of waste soil and inert construction debris. The unit will be constructed on top of ±50-acres of the White Rock

North Dump (WRND) within the existing Aerojet-owned ±250-acre WRND parcel. Phase one also includes transportation of approximately 500,000 CY of Transfer Material from the existing Aerojet Landfill consistent with the separately approved Aerojet Landfill Clean Closure Plan. The Aerojet Landfill is an existing approximately 180-acre, non-operating, closed landfill owned by Aerojet located within the proposed Aerojet Waste Consolidation Unit Service Area approximately 2.3 miles north of the proposed WRND parcel. Majority of the material will be received from Aerojet Landfill, however it is anticipated that additional materials may be accepted from other projects within the Aerojet Consolidation Unit Project Area, as defined in the IS/MND. Following the acceptance of 1,000,000 CY of Transfer Material or by December 31, 2035, whichever comes first, the entire unit will be closed and capped consistent with Title 27 requirements. Phase two would consist of the cap and closure of the remainder of the existing WRND and any remaining portions of the Aerojet Waste Consolidation Unit consistent with Title 27 requirements.

Operations would mostly occur Monday through Friday from 7:00 a.m. to 6:00 p.m. Ancillary Activities, as defined in the IS/MND are allowed 7 days a week, 24 hours per day.

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 IS/MND, in addition to the specific location noted.

Comments for the IS/MND are summarized in the table below:

Chapter/Section	Page	Comment
2.2.2 Phase 2	2-4	<p>“However, in the event that the AWCU is not filled, Aerojet commits to completion of the capping of the filled portion of the AWCU and the remainder of the WRND by December 31, 2035....”</p> <p>How will this closure date be enforced by other agencies? In the event 1,000,000 CY of material is not received when would closure activities begin to ensure they are completed by December 31, 2035? What steps would be taken if closure activities need to extend beyond 2035?</p>

Chapter/Section	Page	Comment
2.2.2 Phase 2 Schedule	2-5	<p>“While most operations and construction tasks would occur Monday through Friday between the hours of 7:00am to 6:00pm, some deviation may be necessary.”</p> <p>Hours of operation should be specific without deviation while ancillary hours allow for more flexibility. Please specify what the proposed hours of operation for transfer and disposal activities will be.</p>
2.3.1 Aerojet Landfill	2-6	<p>“While the WMUs are mostly at ground level, site elevation ranges from approximately 200 to 280 feet above mean sea level.”</p> <p>Is this the mean sea level of the project site currently or the proposed final mean sea level? Please specify what the proposed final maximum elevation for the Aerojet Waste Consolidation Unit will be.</p>
2.3.1 Aerojet Landfill	2-9	<p>“...waste disposed in the Aerojet Landfill is understood to include primarily items such as: kitchen or restaurant garbage; cardboard and paper products; glass, plastic, wood, and metal items; scrap from construction work and demolition waste; and green waste.....Aerojet Landfill investigation results indicate that some of the soil surrounding this waste, if removed, would be classified as contaminated, nonhazardous Class II waste. This Class II waste soil and some of the scrap from construction work and demolition debris is referred to in this document as “Transfer Material.””</p> <p>Kitchen or restaurant garbage, cardboard and paper products, green waste, and glass, plastic, wood, and metal items are not considered construction and demolition debris. The project description states that the unit is for waste soil and inert construction debris. Please specifically</p>

Chapter/Section	Page	Comment
		<p>state what types of waste will be disposed in the Aerojet Waste Consolidation Unit waste cells.</p> <p>Please clarify how materials that are not construction and demolition debris will be separated from the soil and disposed of at an appropriately permitted facility or if some of those items are expected to be disposed in the Aerojet Waste Consolidation Unit waste cells.</p> <p>Have the criteria been considered in Title 14 CCR Section 17361(b) to determine if this facility can be classified as a contaminated soil disposal facility?</p>
<p>2.4 Aerojet Waste Consolidation Unit Project Purpose and Need</p>	<p>2-21</p>	<p>“Furthermore, the transport of up to approximately 1,000,000 CYs of waste over public streets and highways to an existing offsite landfill that would accept it raised concerns. The concerns are related to the potential impacts to roadways, air quality and public safety associated with thousands of truck trips to and from the offsite landfill(s), with each round trip being approximately 120 miles.”</p> <p>To which landfill are the estimates of round trips being calculated on? If Sacramento region landfills are used for these estimates would the round trip mileage and therefore the impacts outlined in this document be significantly reduced? For example the IS/MND states “Eliminates emissions from approximately 4.19 million miles of diesel truck hauling.” How would this value change if a landfill within the Sacramento region was used?</p>
<p>3.1 Project Overview</p>	<p>3-1</p>	<p>“..when Transfer Material is generated, it would be sampled and analyzed for chemicals of concern based upon generator knowledge to profile the waste accordingly. The waste would be sampled to confirm it is non-hazardous. If the results confirm the Transfer Material is non-hazardous, it would be disposed in the AWCU. If the results indicate Transfer Material is</p>

Chapter/Section	Page	Comment
		<p>hazardous, it will be hauled offsite to a Class I facility.”</p> <p>Will material accepted from the Aerojet Waste Consolidation Unit Service Area (not Aerojet Landfill) be required to be sampled and analyzed?</p>
<p>3.2.3 Construction Approach</p> <p>Environmental Stewardship Measures</p>	<p>3-15, 3-16</p>	<p>“Construction documents will identify materials that are considered hazardous consistent with the Project approved JTDs.”</p> <p>“Project recycling requirements outlined in the JTDs shall be implemented through agreements executed with a local recycling or landfill operator (e.g., Schnitzer Steel in Rancho Cordova and/or Kiefer Landfill).”</p> <p>There will only be one JTD for this facility, not multiple. Please correct this so JTD is not plural throughout document.</p>
<p>3.2.4 Construction Tasks, Personnel, and Equipment</p> <p>Clearing and Grubbing</p>	<p>3-23</p>	<p>“Segregated waste would be managed in accordance with applicable state and federal laws and regulations; however, non-hazardous, contaminated soils and construction debris consistent with Phase 1 AWCU acceptance criteria and specifications may be processed and eventually placed in the new AWCU. Waste that is not suitable for onsite consolidation would be transported offsite”</p> <p>Please clarify that any waste transported offsite would be sent to a permitted solid waste facility.</p>
<p>3.2.4 Construction Tasks, Personnel, and Equipment</p> <p>Haul and Placement of Transfer Material Waste</p>	<p>3-25</p>	<p>“Daily cover consistent with Title 27 requirements would be specified in either the project’s WDRs or in a future agency approved “Daily Cover Plan.” Daily cover would be applied at the end of each filling day using a dozer or special deployment equipment.”</p> <p>What agency is responsible for approving “Daily Cover Plan”? Will this be included in the JTD?</p>

Chapter/Section	Page	Comment
<p>5.17.1 Transportation Environmental Setting</p>	<p>5-129</p>	<p>“The entrance to the property is controlled through access gates and guard stations. Access to the site must be prearranged and authorized by appropriate Aerojet personnel. Project implementation would occur within Aerojet’s access-controlled property and would not involve public roadways.”</p> <p>Please clarify if this would apply to members of the public or if it would apply to any government official as well. It is common practice for most government inspections of facilities to be unannounced and therefore not prearranged and authorized.</p>
<p>5.19.2 Utilities and Services System (XIX) Environmental Checklist and Discussion</p>	<p>5-142</p>	<p>“The Proposed Project is a waste consolidation project and would not generate new waste subject to federal, state, and local management and reduction statutes and regulations. There would be no impact, and no mitigation is required.”</p> <p>This statement appear to be incorrect. If the project is proposing to accept materials from other sources besides the Aerojet Landfill, as described in the project description, there is potential for new waste to be generated. Material that is brought from outside sources may result in some material items that need to be removed and sent to other permitted solid waste facilities for handling and disposal.</p>

Solid Waste Regulatory Oversight

The Sacramento County Environmental Management Department is the Local Enforcement Agency (LEA) for Sacramento County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA at 916.591.6995 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 IS/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 916.341.6066 or by e-mail at Alyssa.Williams@calrecycle.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Alyssa Williams".

Alyssa Williams, Environmental Scientist
Permitting & Assistance Branch – Central Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Patrick Snider, Supervisor
Permitting & Assistance Branch – Central Unit
CalRecycle

Will Scheffler, LEA
Sacramento County Environmental Management Department