



October 16, 2020

Mr. John Lanier, Assistant Planner  
Glenn County Planning and Community Development Services Agency  
225 N Tehama Street  
Willows, California 95988

**Subject: SCH No. 2020090411** – Draft Initial Study/Mitigated Negative Declaration for the expansion of Compost Solutions working area, SWIS No. 11-AA-0034, Glenn County

Dear Mr. Lanier:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to review the MND to provide comments on the proposed project.

### **PROJECT DESCRIPTION**

The Glenn County Planning and Community Development Services Agency, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Draft Initial Study/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 **Conditional Use Permit 2006-006, Amendment 2020-001 Compost Solutions, Inc., Expansion** is located on the north side of County Road 27, on the east side of County Road N, west of County Road P, and south of County Road 25, approximately 3.5 miles southeast of the City of Orland, in the unincorporated area of Glenn County.

The proposed project would expand the current operation to 40 acres, which includes nine additional acres of summer only composting area and a 2.5-acre retention pond to contain onsite storm water, drainage diversions, and removal of biosolids composting.

### **COMMENTS**

CalRecycle staff's comments on the proposed project are listed below.

**Initial Study  
Project Summary  
Page 3**

*“The 28-acre parcel currently contains approximately: 3 acres of parking and storage areas, 4 acres of vegetated area to act as a filter strip, and 21 acres of compost-turning area.*

*This revision includes:*

*The addition of a 12-acre parcel located to the east for a revised total of 40 acres.*

*Approximately 9 additional acres of compost working surface (summer use only).*

*Addition of a retention pond to contain onsite stormwater.*

*Removal of and filling of previous filter strip.*

*Drainage revisions on current working face.”*

Please verify that the project will allow an increase from 21 to 30 acres for active composting and be 40 acres in totality. Additionally, please define “summer use only” (e.g. June 20 through September 22).

### **Other Public Agencies Whose Approval is Required Page 3**

*The addition of acreage and the pond will require the facility to upgrade its existing Agricultural Material Composting Operation permit to a Compostable Material Handling Facility permit as required by California Code of Regulations Title 14. The updated permit will require an updated Report of Composting Site Information (RCSI) and Odor Impact Management Plan (OIMP). The Glenn County Environmental Health Department acts as the Local Enforcement Agency (LEA) on behalf of Cal Recycle.*

The operator for Compost Solutions currently has a full Solid Waste Facilities Permit (SWFP) as a Compostable Material Handling Facility. The operator will need to submit an application for a revised SWFP from the LEA and receive concurrence from CalRecycle to allow for the proposed expansion of permitted area.

### **Staff Report Mitigation Monitoring Program and Conditions of Approval Hydrology and Water Quality Page 2**

*“That the operator shall cover all compost feedstock stored onsite with a tarp prior to the onset of the rain season, or between October 31 and April 1, to minimize leachate into the groundwater.”*

*“Timing/Implementation: In Perpetuity  
Enforcement/Monitoring: Glenn County Environmental Health Department”*

It is not clear if the monitoring agency for this mitigation measure is the Local Enforcement Agency or a different program within the Glenn County Environmental Health Department. Please clarify.

**Staff Report**  
**Mitigation Monitoring Program and Conditions of Approval**  
**Mandatory Findings of Significance**  
**Page 3**

*“That the following Vector Control Plan shall be implemented:*

- 1. There will be no standing water on the site related to the composting facility.*
- 2. Weeds and grasses will be chopped to limit rodent habitat.*
- 3. Manure and other fly-attracting materials will be tarped.*
- 4. Manure will be brought on-site and mixed into the windrows just prior to commencement of the composting system.*
- 5. The compost turning system will heat windrows to 140 + degrees, which will kill fly larvae.”*

*“Timing/Implementation: In perpetuity*

*Enforcement/Monitoring: Glenn County Environmental Health, Glenn County Air Pollution Control District”*

Define chopped in number two above. Recommended rewording sentence to state weeds and grasses will be maintained to minimize vector populations.

Please clarify will manure be incorporated into compost piles once it arrives at the site or can it be stockpiled under tarps?

**Summary Form for Electronic Document Submittal**  
**Page 1**

*“Compost Solutions, Inc. has applied for an amendment to Conditional Use Permit 2006-006, AMMD 2020-001. The amendment will include the following. The addition of a 12-acre parcel located to the east of the project site for a revised total of 40 acres, approximately 9 additional acres of compost working surface (for summer use only), an approximately 2.5 acre retention pond to contain onsite stormwater, removal of and filling of the previous filter strip, and drainage revisions to the current working face. The annual tonnages, trucking, feedstocks will not change, except for the elimination of biosolids from the compost. Compost Solutions, Inc. will use manure waste (primarily from dairies) and green waste (primarily from cities and orchards) to create compost to serve the agricultural industry. The site is not open to the public. Composting facilities are an allowed use with an approved Conditional Use Permit (Glenn County Code §15.330.040.B). The parcel is 45.89± acres. Approximately 40± acres are proposed for*

*the composting operation, with 5.89± acres for the compost windrows; Additional information is included in the application and plot plans.”*

Is the total proposed acreage for the compost facility 40 or 45.89 acres? Adding 12 acres to the current facility size would bring the total acreage to 40.

## **SOLID WASTE REGULATORY OVERSIGHT**

The Glenn County Department of Environmental Health is the Local Enforcement Agency (LEA) for Glenn County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA at 530.934.6102 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 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 916.324.3753 or by e-mail at [Patrick.Snider@CalRecycle.ca.gov](mailto:Patrick.Snider@CalRecycle.ca.gov).

Sincerely,

Patrick Snider  
Senior Environmental Scientist (Supervisor)  
Permits & Assistance North Section, Central Unit  
Permitting & Assistance Branch – CalRecycle

cc: John Wells, Local Enforcement Agency  
Glenn County Department of Environmental Health