



July 14, 2023

Governor's Office of Planning & Research

Jul 14 2023

STATE CLEARINGHOUSE

Mr. Hector Guerra, Chief Environmental Planner
County of Tulare Resource Management Agency
5961 S. Mooney Blvd.
Visalia, CA 93277

Subject: Notice of Preparation for a Draft Focused Subsequent Environmental Impact Report for the Visalia Disposal (Landfill) Site - Compost and Biomass Conversion Facility - SCH# 2021020054, SWIS No. 54-AA-0009, Tulare County

Dear Mr. Guerra:

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 Tulare County Resource Management Agency (RMA), acting as Lead Agency, has prepared and circulated a Notice of Preparation (NOP) for a Draft Focused Subsequent Environmental Impact Report (SEIR) 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 Compost and Biomass Conversion Facility (proposed project) is located at the existing Visalia Disposal Site, on an approximately 36-acre site located at the northeast corner of Avenue 328 and Road 80, near the City of Visalia. The site is currently zoned as AE-40.

The Visalia Disposal (Landfill) Site is currently permitted for receiving up to 2,000 tons of municipal waste per day. A maximum of 1,200 haul truck trips will be used to deliver landfill and compost material; 900 haul truck trips would deliver landfill material to the existing landfill and 300 haul truck trips would deliver compost material to the composting operation located within the Landfill's existing footprint.

The original EIR (SCH# 2000051098) project description would allow the operation of a covered aerated static pile (CASP) compost facility. The compost facility would occupy 36 acres of the 634-acre landfill parcel. The compost facility will be designed to accept

up to 200,000 tons per year (TPY) in increments of 50,000 TPY and can store up to 200,000 cubic yards on site of organic material. There would also be the installation and use of composting equipment, installation of a 50,000 square foot processing building, construction of compost pads, and a lined pond.

COMMENTS/QUESTIONS

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 Draft Focused SEIR.

NOP:

- The NOP, in the Project Description section, describes the project as 2,000 tons per day (tpd) and an increase in vehicle trips from 900 to 1,200 vehicles per day (vpd). The description reiterates that the daily tonnage will not increase from 2,000 tpd. However, a Memorandum dated July 10, 2023, was circulated by the RMA noting that, "...the purpose of the Project is to increase the maximum total daily tonnage at the Project site (i.e., all area within the Landfill boundaries) from 2,000 to 3,000 tons per day and to increase maximum haul trucks received from 900 to 1,200 trucks per day." The reference and analysis of the 1,000 tons per day increase must be included in the Draft Focused SEIR.
- Although it has been included in previous CEQA, please include, in the Draft Focused SEIR, the days and hours of operation (receipt of material, ancillary, maintenance, etc.) and all types of materials/feedstocks that will be accepted for the compost facility.

CalRecycle has reviewed the responses to our January 19, 2022 comment letter in the Final Focused EIR (SCH# 2021020054). Based on the responses, CalRecycle has the following follow-up comments:

- For Comment Subject 11, it is stated that the following materials would be accepted at the compost facility: mixed material, organic waste, green material, food material, agricultural material, and digestate. For Comment Subject 20, it is stated that wood waste would be stored for up to 30 days, and green waste, organics, and food waste would be stored up to 48 hours. What will be the storage time for the mixed material, agricultural material and digestate?
- For Comment Subject 22, it is stated that the receiving hours for the compost facility will be Monday – Friday, 7:00 a.m. to 4:00 p.m., Saturday, 8:00 a.m. to 4:00 p.m., and restricted on Sunday, to harmonize with the landfill permitted hours. It is also stated that the CASP system and operation inside the Tipping and Processing Building will be 24 hours a day, seven days a week. It is then

also stated that the outdoor grinding operation will be restricted on Sundays. Is the grinding operation then limited to the same hours as the receiving hours?

Additional Information

The following is a link to CalRecycle's CEQA homepage which may assist the Lead Agency in preparing the Draft Focused SEIR for solid waste facilities, including composting activities: <https://calrecycle.ca.gov/swfacilities/permitting/ceqa/>.

Solid Waste Regulatory Oversight

The Tulare County Department of Health Services, Division of Environmental Health is the Local Enforcement Agency (LEA) for Tulare County and responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. Please contact the LEA, Jessica Gocke, at (559) 624-7400 or JGocke@tularehhsa.org, 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 and preparation of the Draft Focused SEIR.

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) 341-6772 or by e-mail at Joy.Bowers@calrecycle.ca.gov.

Sincerely,



Joy Bowers, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

Visalia Compost & Biomass

NOP Comment Letter

July 14, 2023

Page 4 of 4

cc: Ivan Palenyy, CalRecycle
Jessica Gocke, Tulare County LEA
Ben Escotto, CalRecycle