



February 5, 2024

Gary Mills, Chief Environmental Planner
Tulare County Resource Management Agency
Environmental Planning Division
5961 S. Mooney Blvd.
Visalia, CA 93277

Governor's Office of Planning & Research

February 06 2024

STATE CLEARINGHOUSE

Subject: Draft Focused Subsequent Environmental Impact Report (SEIR) for the Visalia Disposal (Landfill) Site and Biogas and Compost Facility – Landfilling Operations - SCH # 2021020054, SWIS No. 54-AA-0009, Tulare County

Dear Mr. Mills:

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 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 Visalia Disposal (Landfill) Site and Biogas and Compost Facility – Landfilling Operations (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 AE-40.

The Visalia Disposal (Landfill) Site is currently permitted for receiving up to 2,000 tons of municipal waste per day. The proposed project would allow for 1,000 tons per day of compostable material for a covered aerated static piles (CASP) compost facility; a total of 3,000 tons per day for the entire site. A maximum of 1,200 haul truck trips will be used to deliver landfill and compostable material; 900 haul truck trips would deliver landfill material to the existing landfill and 300 haul truck trips would deliver compostable material to the composting facility located within the Landfill's existing footprint.

The hours of operations for receiving waste material will harmonize with the landfill with the following hours of operations: Monday – Friday, 7:00 am to 4:00 pm and Saturday, 8:00 am to 4:00 pm. The hours of operations of processing material will be 24 hours per day, 7 days per week. The waste material received in the processing building may be processed 24 hours per day to accommodate surge piles and process within a 48-hour holding time period from the time of receipt. The CASP piles will provide moisture control and oxygen via fans, that are controlled electronically on a timer throughout the 24-hour day. CASP piles may be processed throughout the day to accommodate wind patterns that could limit processing during the calmer portions of the day.

The compost facility would occupy 36 acres and 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. The proposed project would also include the installation and use of composting equipment, installation of a 50,000 square foot processing building, construction of compost pads, and a lined pond. The facility would receive and handle compostable material, such as agricultural materials, food material, green material, mixed material, organic wastes, digestate and pre-processed feedstock ready CASP materials.

A 2.0 mega-watt (MW) biomass conversion facility will also be located near the landfill. The facility will produce electricity, heat and biochar using wood fuel that will be provided by local activities, such as wood waste. The facility will utilize approximately 18,000 bone dry tons (BDT) of wood chips per year or 25,000 tons of per year of wet recovered wood waste and produce approximately a net amount of 2.0 MW of electrical energy per hour. In addition, this facility will produce approximately 20-30 million British Thermal Units (MM BTU) of waste heat and approximately 300-600 pounds of biochar per hour. The facility is planned to operate 24/7.

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 Final Focused SEIR.

- Page 1-14 lists CalRecycle as the California Integrated Waste Management Board. Please correct to the Department of Resource Recycling and Recovery (CalRecycle).
- Page 2-12, Hours of Operation: 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., to harmonize with the landfill permitted hours, and the hours of operations of processing material will be 24 hours per day, 7 days per week. Page 2-14 to 2-15, Grinding Pre-Processing Operations, states that, “Additional equipment, such as a grinder, conveyors, and shaker deck, would be installed on the project site to complete these process operations.” Please clarify if the

processing of material (24 hours per day, 7 days per week) includes the use of the grinder, conveyors and shaker deck. Does 'processing' include monitoring, such as temperature monitoring?

- Page 2-15, Grinding Pre-Processing Operations: It is stated, "The co-collection residential organics [green material mixed with food material] would be stockpiled on a pad for a maximum period of 48 hours and green waste and wood waste could be stored for up to 30 days." What will be the storage time for the other types of feedstocks (e.g., mixed material, agricultural material, digestate, etc.)?
- Appendix D – CEQA Process, NOP Comments Received: Does not include the letter submitted by CalRecycle, dated July 14, 2023, and received by SCH on July 14, 2023 (<https://ceqanet.opr.ca.gov/2021020054/7>). A copy was also emailed to Hector Guerra, the previous Environmental Planner assigned to this proposed project.
- For the proposed biomass conversion activity, in order to be considered biomass conversion, the activity will have to meet all the requirements pursuant to [Public Resources Code Section 40106](#). If the activity does not meet the requirements of PRC Section 40106, the activity may be subject to CalRecycle's solid waste facility permitting requirements.

Additional Information

The following is a link to CalRecycle's CEQA homepage which may assist the Lead Agency in preparing the Final 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 Final Focused SEIR.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

Visalia Compost & Biomass
Draft SEIR Comment Letter
February 5, 2024
Page 4 of 4

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

cc: Ivan Palenyy, CalRecycle
Jessica Gocke, Tulare County LEA
Ben Escotto, CalRecycle
Bryce Howard, Lead Agency Director