



September 9, 2021

Governor's Office of Planning & Research

September 09 2021

STATE CLEARINGHOUSE

Ms. Teresa McDonald, Associate Planner
Stanislaus County Planning & Comm. Dev.
1010 10th Street, Suite 3400
Modesto, CA 95354

**Subject: SCH No. 2021080569 - Request for Early Consultation for West Main
Compost, PLN2021-0012 - County of Stanislaus**

Dear Ms. McDonald:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The Stanislaus County Planning and Community Development Department, acting as Lead Agency, has prepared a Notice of Early Consultation in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies for the proposed project.

The proposed West Marin Compost facility would be located at 1236 West Main Street, between S Carpenter Road and Crows Landing Road, Crows Landing. The surrounding land use is agriculture, and the proposed site is currently zone A-2-40 (General Agriculture).

Based on the information provided in the Request for Early Consultation, the proposed project would allow an aerated static pile (ASP) composting facility to operate on 23.5 acres of a 47.82-acre parcel that would accept and process landscape residue, vegetative food material, and green waste. The proposed facility would receive 140 tons each day with 20 truck trips per day. Hours of Operation would be 7:00 a.m. to 5:00 p.m. Monday through Saturday. No buildings are proposed.

COMMENTS

Based on the project description, the proposed facility will require a Registration Permit or Compostable Materials Handling Facility Permit issued by CalRecycle. Please see

the following link for more information on the composting process, regulatory tiers, and requirements:

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/FacilityType/Compost/>

Specifically, here is CalRecycle's guidance on the preparation of CEQA documents for compost facilities:

<https://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Compost/>

Further, staff has the following questions and comments:

1. CalRecycle staff provided comments to the operator of West Coast Main, a.k.a. Machado & Sons Construction, via email on November 19, 2020, and March 16, 2021. The operator will need to address all the comments prior to submitting an application for a Registration Permit or Compostable Materials Handling Facility Permit.
2. The project description states that 120-140 tons per day of material will be delivered and processed each day. Will the CEQA document impose a limit on the amount of tonnage the facility can receive each day?
3. The project description describes amounts of piles in cubic yards. What is the total proposed design capacity of all materials on site, including feedstock, chipped and ground material, amendment, additives, active compost, and stabilized compost on site at any one time in tons and in cubic yards?
4. Hours of operation state 7am-5pm, Monday thru Saturday. Will this be the limit on all operating hours, including processing of materials, windrow/pile maintenance? What if there is an emergency (i.e., fire or equipment failure, that requires the operator to work outside of those hours)? Please accommodate for emergency and ancillary hours. The permitted hours of operation will be limited to what is analyzed in CEQA, so please leave flexibility.
5. The project description states that no buildings will be construction, that only portable toilets will be provided for employees. What type of shelter will be provided for employees at the facility? Other governing agencies may require that employees have shelter from the elements. Will a mobile office or break room be provided?
6. Will the amount of any of the feedstocks be limited? What types of material and volume can the facility receive?

7. Will any other type of composting method(s) will be used (i.e., windrow)? Please describe all the composting method(s) that will be allowed. Consider how material will be processed if the ASP system does not function as planned.
8. How will any contaminants be stored and disposed of?

CONCLUSION

CalRecycle is the solid waste Enforcement Agency (EA) for Stanislaus County and is responsible for making a determination of what regulatory tier/permit is appropriate for the proposed project. CalRecycle's regulatory requirements are provided in Title 14, California Code of Regulations, Chapter 3.1.

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the Notice for Early Consultation 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 project are sent to the Permitting and Assistance Branch.

If you have any questions or comments regarding this letter, please contact me at (916) 341-6772, or email me at joy.isaacson@calrecycle.ca.gov.

Sincerely,



Joy Isaacson
Permitting and Assistance Branch
Waste Permitting, Compliance, and Mitigation Division
CalRecycle

cc via email: Randy Friedlander, CalRecycle.