



January 22, 2025

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

Subject: SCH No. 2021080569 – Initial Study and Draft MND for West Main Compost,
PLN2021-0012 – Stanislaus County

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 an Initial Study and Draft Mitigated Negative Declaration (MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies for the proposed project.

The proposed West Main Compost facility (project) 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 zoned A-2-40 (General Agriculture).

Based on the information provided in the Initial Study and Draft MND, 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 material. The design capacity of the site would be 115,272 cubic yards (43,350 cubic yards of feedstock, 16,500 cubic yards of in-process active compost, 51,682 cubic yards of curing compost, 3,700 cubic yards of finished product, and 40 cubic yards of soil amendment). The proposed facility would receive 160 tons each day, with 26 truck trips per day and 7 additional trips for employee vehicles. Hours of Operation would be 7:00 a.m. to 5:00 p.m. Monday through Saturday, and in case of an emergency. The end product will consist of soil amendments which will be sold to local farms. There will be a 960-square foot modular office with restroom and two separate additional portable restrooms for employees.

Equipment will be portable and remain on site. No permanent structures or buildings are proposed.

COMMENTS

CalRecycle staff provided comments to you in a letter, dated September 9, 2021, as a response to a request for early consultation. Thank you for addressing the comments. The following comments are reminders and additional questions and comments. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Initial Study and Draft MND, in addition to the specific location noted.

Based on the project description, the proposed facility will require a 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/>

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

<https://www2.calrecycle.ca.gov/Docs/Web/123054>

Additionally:

1. The Description of Project states that 160 tons per day of material will be delivered and processed each day. Will the CEQA document account for seasonal fluctuation of material? Or does this document impose a limit on the amount of tonnage the facility can receive each day?
2. The Description of Project states that the hours of operation will be 7:00 am - 5:00 pm, Monday through Saturday and in case of an emergency. Are there any restrictions to these ancillary hours such as operating large equipment? Will this be the limit on all operating hours, including processing of material, pile maintenance, etc.?
3. The design capacity of the site would be approximately 115,272 cubic yards (43,350 cubic yards of feedstock, 16,500 cubic yards of in-process active compost, 51,682 cubic yards of curing compost, 3,700 cubic yards of finished product, and 40 cubic yards of soil amendment). Will this be the limit on design capacity and limit for each category of material. Does this document leave any flexibility for each category?
4. The Description of Project states, "The end product will consist of soil amendments which will be sold to local farms." It is also stated, as noted in comment 3., that the design capacity consists of 3,700 cubic yards of finished

product and 40 cubic yards of soil amendment. Please clarify the differences between the soil amendment as end product, finished compost product, and the 40 cubic yards of soil amendment, including what each consists of and their purpose. See link below in comment 5. for the regulatory definition of “amendments.”

5. The Description of Project states that feedstock “will consist of a combination of landscape residue, vegetative food material, and green waste.” Are there any other potential feedstocks that the facility will utilize? Please include any potential feedstocks. Please clarify what “landscape residue” will consist of. It is recommended that the regulatory terminology for describing the feedstock be used. Here is a link to the definitions for composting activities:

[https://govt.westlaw.com/calregs/Document/I989677945B4D11EC976B000D3A7C4BC3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I989677945B4D11EC976B000D3A7C4BC3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

6. The Description of Project states that the facility will use Aerated Static Pile (ASP) as the composting method. Will any other type of composting method(s) 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. Further, per the Site Dimensions figure (pdf page 41), there is an area designated “windrow space”. Please clarify whether this is for windrows or ASP piles.
7. The project description states that contaminants will be taken off site once a week. How will the contaminants be stored on site?
8. On page 3 of the Initial Study, Environmental Factors Potentially Affected, there is a check for environmental factor “Hydrology/Water Quality” which indicates it as potentially significant. Per the Initial Study and Mitigation Monitoring Reporting Program, it is indicated that “Hazards & Hazardous Materials” is the environmental factor that is potentially significant. Please correct on page 3.

Solid Waste Regulatory Oversight

CalRecycle is the solid waste Enforcement Agency (EA) for Stanislaus County and is responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. The proposed project will require a Compostable Materials Handling Facility Permit. Please work with CalRecycle on the permit process.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the Initial Study and Draft MND and hopes that this comment letter will be useful to the Lead Agency in preparing the Final MND and in carrying out their responsibilities in the CEQA process.

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CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any notices of determination for this 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 email me at joy.bowers@calrecycle.ca.gov.

Sincerely,



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

cc via email: Benjamin Escotto, CalRecycle
Randy Friedlander, CalRecycle
Justin Vlach, CalRecycle