



October 21, 2021

Governor's Office of Planning & Research

**Oct 21 2021**

Reynaldo Aquino, Associate Planner  
City of Jurupa Valley  
8930 Limonite Avenue  
Jurupa Valley, CA 92509

**STATE CLEARING HOUSE**

**Subject: SCH No. 2021090587** – Draft Initial Study/Supplemental Mitigated Negative Declaration for City of Jurupa Valley Master Application 21131, PreZero USA, Inc. MA21131 – Riverside County

Dear Mr. Aquino:

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 City of Jurupa Valley, acting as Lead Agency, has prepared and circulated a Draft Initial Study/Supplemental Mitigated Negative Declaration (IS/SMND) 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 project, PreZero USA, Inc. MA21131, is located at 4350, 4388, and 4420 Serrano Drive and is identified by the following Assessor's Parcel Numbers: 156-210-095, 156-210-096, and 156-210-097. The proposed project is bound by San Sevaine Way to the north, Serrano Drive to the southwest, and Bain Street to the east, in the City of Jurupa Valley. The project site is approximately 18.7 acres and is currently zoned for Manufacturing-Heavy (M-H-5). The project site is designated Light Industrial and surrounded by Light Industrial uses to the north, south, east, and west and Medium Density Residential to the east/northeast.

The proposed project would operate in existing buildings as a recycling and organics facility 24 hours a day, 7 days a week. Operations include the reception of materials from trucks; black soldier fly operation in building 1; material receiving, plastic recycling, and organic material processing in building 2; dry material recycling in building 3; outbound shipment of waste residual on trucks to landfills; and outbound shipment of plastic pellets and protein meal to market buyers. Maximum daily truck trips are estimated to be at 195, for commercial and semi/flatbed trucks, at a maximum capacity of 1,200 tons per day.

## **COMMENTS**

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 IS/SMND, in addition to the specific location noted.

Page 7, Section 2.5 - Operational Characteristics – *It is stated that the facility would operate 24 hours a day, 7 days a week.*

Comment: Will the facility be closed or open on any holidays? Are there any different categories of operational hours (i.e., administrative hours, hours for receipt of refuse/waste, and ancillary hours)? Are these operational hours the same for all three buildings? If not, what are the individual building hours?

Page 7, Section 2.5 - Operational Characteristics – *It is stated that approximately 195 commercial and semi/flatbed trucks would enter and exit the facility each day at a maximum capacity of 1,200 tons per day.*

Comment: Are there other vehicle types that will count towards total traffic volume (i.e., employees, visitors)? Is this a maximum number on vehicle count coming in and out? Is this per one building or all three buildings? If for all three buildings, what is the total traffic number per building?

Comment: Is 1,200 tons per day the maximum tonnage? Is this for all three buildings or for only one building? If for all three buildings, then what is the maximum tonnage for each one?

Pages 7 and 8, Section 2.5 - Operational Characteristics, Building 1 Operations – *It is stated that larvae would be processed to produce a protein meal for animal food. It is also stated that out-going material from Building 1 would be loaded onto trucks, weighed on the out-bound scale and delivered to market.*

Comment: During the production of protein meal in Building 1, is the out-going material going to be stored prior to being loaded onto trucks? If so, how and how long? Is there any residual waste generated in this process and if so, how is it managed? Can more details be provided on the process of protein meal production?

Page 8, Section 2.5 - Operational Characteristics, Building 2 Operations – *It is stated that trucks carrying plastic, dry recyclables, and organic material would be primarily directed to Building 2. Building 2 would consist of three primary areas: Material Receiving, Plastics Manufacturing, and Organics Manufacturing.*

Comment: Will there be any trucks carrying wastes that are commingled (i.e., organic material that is unpackaged mixed with dry recyclables and/or plastic)? If so, how will this be managed at the facility?

Page 8, Section 2.5 - Operational Characteristics, Building 2 Operations, Material Receiving – *It is stated that approximately 950 tons per day would be delivered to Building 2.*

Comment: Is this the maximum tonnage for Building 2? If so, how does the 950 tons per day relate to the 1,200 tons per day from trucks that will be entering and exiting the facility?

Page 9, Section 2.5 - Operational Characteristics, Building 3 Operations – *It is stated that dry recyclable material received by truck from Building 2, as well as direct hauled material, would be off-loaded by forklift inside of Building 3.*

Comment: Are any of these materials commingled with organics? If so, how are the organics going to be managed?

Page 14, Figure 2.4: Proposed Site Plan Changes

Comment: The notations on the three buildings do not appear to represent what is described in the project description.

Page 20, Section 5.1 - Aesthetics, Threshold 5.1 (b)

Comment: It appears there is no table to represent Threshold 5.1 (b).

#### Solid Waste Regulatory Oversight

The Riverside County Department of Environmental Health is the Local Enforcement Agency (LEA) for Riverside County and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact the LEA, Sandi Salas, at 951.955.8980 or [ssalas@rivco.org](mailto:ssalas@rivco.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 preparing the Final IS/SMND and 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.

PreZero USA, Inc. MA21131 - Draft IS/SMND

October 21, 2021

Page 4 of 4

If you have any questions regarding these comments, please contact me at 916.341.6084 or by e-mail at Theodore.Tasiopoulos@calrecycle.ca.gov.

Sincerely,



Theodore Tasiopoulos, Environmental Scientist  
Permitting & Assistance Branch – South Unit  
Waste Permitting, Compliance & Mitigation Division  
CalRecycle

cc: Benjamin Escotto, Supervisor  
Permitting & Assistance Branch – South Unit

Sandi Salas, Supervisor  
Riverside County LEA