



March 18, 2022

Governor's Office of Planning & Research

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John Pinckney, Deputy Director
Inyo County Public Works
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STATE CLEARINGHOUSE

Subject: SCH No. 2022020028 – Notice of Preparation of a Draft EIR - Acquisition of Fee Title for Continued Operation of Bishop-Sunland, Independence and Lone Pine Landfills – Inyo County – Facility Numbers: 14-AA-0005, 14-AA-0004, and 14-AA-0003

Dear Mr. Pinckney,

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 County of Inyo, acting as Lead Agency, has prepared and circulated a Notice of Preparation (NOP) and Notice of Public Scoping Meeting to prepare a CEQA Initial Study and Draft Environmental Impact Report (EIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed projects.

Bishop Sunland Landfill is located at 110 Sunland Reservation Road, Bishop, CA 93514. The site is approximately 120 acres and it, and the surrounding land, is zoned as Open Space - Minimum 40 Acres. Operations occur daily from 7:30 AM to 3:30 PM with the exception of certain holidays. Bishop-Sunland landfill is currently permitted to

allow 235 vehicles per day and 160 tons per day total (135 tons per day for disposal and 25 tons per day for reuse/recycling).

Independence Landfill is located at the end of Dump Road in Independence, California. The site is approximately 90 acres and it, and the surround land, is zoned as Open Space - Minimum 40 Acres. Operations occur Sunday, from 7 AM to 3 PM, and Thursday, from 7:30 AM to 3 PM, with the exception of certain holidays. Independence Landfill is currently permitted to allow 50 vehicles per day and 10 tons per day.

Lone Pine Landfill is located at the end of Substation Road in Lone Pine, California. The site is approximately 60 acres and it, and the surrounding area, is zoned as Open Space - Minimum 40 Acres. Operations occur Friday, Saturday, and Monday from 7 AM to 3 PM, with the exception of certain holidays. Lone Pine Landfill is currently permitted to allow 75 vehicles per day and 22 tons per day.

The proposed project would include the following changes for each of the above facilities:

- The landowner would change from the Los Angeles Department of Water and Power (LADWP) to the County of Inyo
- Update of the recently approved PCPMPs for each landfill, for approval by the LEA and CalRecycle
- Update of the Joint Technical Document/Report of Disposal Site Information for each landfill
- Preparation of a Solid Waste Facilities Permit Revision Application for each of the three landfills, for submittal to the LEA, CalRecycle, and the Lahontan RWQCB.
- Revision of WDRs with the Lahontan RWQCB to reflect property transfer and current Evaluation Monitoring Program (Lone Pine Landfill) and Corrective Action Program (Bishop-Sunland Landfill)
- Review and potential modification of parcel boundaries, to include the landfill gas and groundwater monitoring well networks for each facility required by CCR Title 27, current WDRs which extend outside of the current lease areas
- Continuation of landfill gas monitoring and reporting according to Title 27 requirements, groundwater monitoring and reporting according to current Monitoring and Reporting Plans, and continued implementation of Evaluation Monitoring and Corrective Action Monitoring programs.
- Continued monitoring and operation of the septage ponds, contaminated soil landfarm, asbestos disposal area, waste oil disposal and recycling facilities, and waste diversion programs according to permit and WDR requirements
- Evaluation of water supply for dust-control and other operational uses, with potential permitting and installation of on-site supply wells as necessary to continue operation and regulatory compliance (which would replace the County's

current practice of trucking in off-site water for such purposes at two of the three landfills).

- Evaluation of reasonably foreseeable operational changes resulting from the
- County's ownership acquisition of the properties.

Comments

When preparing the EIR, please make an effort to use terminology that is consistent with definitions in the applicable sections of the California Code of Regulations, Titles 14 and 27, respectively.

The Solid Waste Facilities Permits for each landfill will need to be updated to reflect the changes in ownership. Prior to implementation of these changes, the operator shall submit the required documentation pursuant to 27 CCR Section 21630, for processing by the Local Enforcement Agency (LEA).

Should modification of parcel boundaries result in a need to increase the permitted area for any of the facilities, revisions to the respective solid waste facilities permits would be required. Prior to implementation of such a change, the operator shall submit an application package for a solid waste facilities permit revision pursuant to 27 CCR Section 21570 for processing by the LEA, pursuant to 27 CCR Section 21650.

Solid Waste Regulatory Oversight

The Inyo County Department of Environmental Health Services is the LEA for Inyo County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Sarah Peterson, at (760) 872-1422 or spetersen@inyocounty.us 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 IS and EIR 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.

If you have any questions regarding these comments, please contact me at (916) 341-6801 or by e-mail at Kelsey.Orr@CalRecycle.ca.gov.

Sincerely,

Handwritten signature of Kelsey Orr in black ink.

Kelsey Orr, Environmental Scientist
Permitting & Assistance Branch – North Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Eric Kiruja, Supervisor
CalRecycle - Permitting & Assistance Branch – North Unit

Sarah Peterson, LEA
Inyo County Department of Environmental Health Services