



September 9, 2022

Ms. Krista Ruesel, Planner
Amador County Planning Department
810 Court St
Jackson, CA 95642



Subject: SCH No. 2022070368 – Use Permit UP-22;3-3 and Zone Change ZC-22;3-1
ACES Waste (2022 Amendment) – Amador County

Dear Ms. Ruesel:

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 Amador County Planning Department, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Negative Declaration 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 amendment to Use Permit-81;7-9 for the Pine Grove Public Transfer Station is located Northeast of Berry Street, and at 19801 Berry St in Pine Grove, CA. The project site is approximately 3.45 acres, and the site is currently zoned for "X" - Special Use District. The site is surrounded by residential and commercial zones and State Highway 88 to the south.

Current operations consist of self haul and commercial loads, with a permitted maximum daily tonnage of 99 TPD. Operations for self haul occur Monday through Saturday, 9am – 12pm and 1pm – 4pm. Operations for commercial loads also occur 7 days a week, 2am – 8 pm. Maximum daily truck trips are estimated to be 125 incoming and 5 to 10 outgoing vehicles per day.

The proposed project would increase daily tonnage from 99 TPD to 150 TPD. It would also increase daily permitted traffic to 175 incoming and 15 outgoing hauling vehicles
1001 I Street, Sacramento, CA 95814 | P.O. Box 4025, Sacramento, CA 95812
www.CalRecycle.ca.gov | (916) 322-4027

per day. The site would also change to a zone “LM” or Light Manufacturing Zoning District.

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

Comments for the IS/ND are summarized below

Project Description, pg. 5

Due to the proposed tonnage change from 99 TPD to 150 TPD, Pine Grove Transfer Station will be regulated as a Large Volume Transfer/Processing Facility instead of the current Medium Volume Transfer/Processing Facility. Each Operator of a Large Volume Transfer/Processing Facility is required to obtain a Full Solid Waste Facilities Permit in accordance with the procedures set forth in Title 27 CCR § 21570. The Operator shall submit a Full Solid Waste Facilities Permit Application Package to the Amador County Environmental Health Department, acting as CalRecycle’s solid waste Local Enforcement Agency (LEA).

The permitted daily traffic of incoming haulers is listed as 155 vehicles per day; the current Registration Tier Permit issued by the LEA for this facility lists the actual number as 125 incoming vehicles/haulers per day. Traffic flow through the facility shall be controlled pursuant to the requirements contained in T14 CCR § 17418.3.

Site Characteristics, pg. 6

The amendment to the Use Permit to allow the proposed project indicates that no construction is proposed. With an increase in daily waste throughput from 99 TPD to 150 TPD, the operator will be required to provide in their Transfer/Processing Report, the facility’s design capacity as well as a description of provisions to handle unusual peak loading.

Solid Waste Regulatory Oversight

Amador County Environmental Health Department is the LEA for Amador County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA at (209)223-6439 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 ND 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 you have any questions regarding these comments, please contact me at (916)322-1914 or by e-mail at Isabelle.Maalouf@calrecycle.ca.gov.

Sincerely,

Isabelle Maalouf, Environmental Scientist
Permitting & Assistance Branch – North Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

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

Jose Quijada, LEA