



Department of  
Resources Recycling and Recovery

Yana Garcia  
Secretary for Environmental Protection  
Rachel Machi Wagoner  
CalRecycle Director

March 24, 2023

Mabel Uyeda, Principal Water Engineer  
City of Oceanside Planning Division  
300 N. Coast Highway  
Oceanside, CA 92054



**SUBJECT:** [SCH No. 2023030309](#) – Mitigated Negative Declaration (MND) for the Food Waste Conversion Project at the Existing San Luis Rey Water Reclamation Facility (SLRWRF)

Dear Mabel Uyeda:

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 Oceanside Planning Division, acting as Lead Agency, has prepared and circulated a Draft MND 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 Food Waste Conversion Project (project) includes the installation of organic material receiving infrastructure and anaerobic digester equipment at the SLRWRF in order to accept food derived digestate which would facilitate diversion of food waste from the landfill. SLRWRF is located north of Mission Road and the San Luis Rey River, and east of Marine Corps Base, Camp Pendleton, in the north central portion of the City of Oceanside in northern San Diego County. The proposed project involves updates made to the existing digester 5 on 0.39 acres in the northwest corner of the SLRWRF. The project would install equipment and supporting infrastructure to bring digester 5 into operational status. The project would include the installation of two main structures: the receiving (hydrolysis) tank, with a 125,000 gallon capacity, and the dewatering facility. Operation of digester 5 will result in the addition of 634,000 gallons of permanent digester capacity.

Material feedstock proposed for the project would be source separated food waste and food soiled paper generated within the City. 10,000 gallons per day of food derived engineered bioslurry (EBS) would be delivered five days per week to SLRWRF, totaling approximately 2,600,000 gallons per year. The delivery truck capacity is 5,000 gallons and there would be two truck deliveries per day. The maximum amount of additional truck trips possible would be four round trips per day, or eight maximum total average daily trips. The annual amount of dewatered digestate or biosolids (from food-derived organic feedstock) to be

hauled off is 3,559 wet tons. The digestate would be trucked to a designated compost facility where it would be converted to compost. The food waste dewatering centrate would be sent to SLRWRF's wastewater treatment stream. None of the byproducts of the 5,200 annual tons of the EBS that would be anaerobically digested as a result of the project would be sent to the landfill.

## **COMMENTS**

### Excluded Activities Title 14 California Code of Regulations (14 CCR) 17896.6

Publicly Owned Treatment Works Treatment Plant (POTW Treatment Plant), as defined in Section 403.3(r) of Title 40 of the Code of Federal Regulations, that receives vehicle-transported solid waste that is an anaerobically digestible material for the purpose of anaerobic co-digestion with POTW Treatment Plant wastewater, is excluded under the following conditions:

(A) Anaerobically digestible materials must be trucked or hauled into a POTW Treatment Plant. Once on-site, the anaerobically digestible material must be pumped or off-loaded directly into a covered, leak-proof container and then pumped, or diluted or slurried and then pumped, and co-digested in an anaerobic digester(s) at the POTW Treatment Plant. The pumped material may be screened, otherwise separated or treated prior to anaerobic digestion, but must be processed and conveyed in a contained system. Any separated material at the POTW that is not suitable for anaerobic digestion and has no beneficial use shall be further managed as a solid waste.

(B) The POTW Treatment Plant has developed Standard Operating Procedures for the acceptance of anaerobically digestible material, the POTW Treatment Plant has notified the Regional Water Quality Control Board that those Standard Operating Procedures are being implemented, and a Standard Provision (permit condition) that reflects the acceptance of anaerobically digestible material:

has been incorporated into the POTW Treatment Plant's Waste Discharge Requirements or National Pollutant Discharge Elimination System permit; or

will be incorporated into the POTW Treatment Plant's Waste Discharge Requirements or National Pollutant Discharge Elimination System permit no later than the next permit renewal.

(C) For the purpose of this exclusion, "anaerobically digestible material" means: inedible kitchen grease as defined in Section 19216 of the Food and Agricultural Code, food material as defined in Title 14, CCR, Section 17896.2(a)(12) and vegetative food material as defined in Title 14, CCR, Section 17896.2(a)(12)(A).

Will this proposed project meet these requirements for exclusion? If not, then the proposed project would be considered a solid waste activity that is subject to the permitting requirements of 14 CCR.

#### Design Parameters

What are the intended hours of operation for this proposed project? Will the waste receiving and handling hours differ from the processing hours? Will there be any differing ancillary or office hours?

The acreage for the digester will be 0.39 acres. Will an overall larger acreage be required for waste receiving, processing and handling? What would the total acreage be?

#### Solid Waste Regulatory Oversight

The San Diego County Department of Environmental Health and Quality, Local Enforcement Agency (LEA) is responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact Catherine Dean, Supervisor, at (619) 204-0702 or by e-mail at [catherine.dean@sdcounty.ca.gov](mailto:catherine.dean@sdcounty.ca.gov) 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 MND 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 approval by the decision-making body.

If you have any questions regarding this matter, please contact me at (916) 341-6719 or [Cody.Oquendo@calrecycle.ca.gov](mailto:Cody.Oquendo@calrecycle.ca.gov).

Sincerely,



Cody Oquendo  
Permits and Assistance South Unit  
Waste Permitting, Compliance, and Mitigation Division

cc via email: [catherine.dean@sdcounty.ca.gov](mailto:catherine.dean@sdcounty.ca.gov) – San Diego County LEA  
[benjamin.escotto@calrecycle.ca.gov](mailto:benjamin.escotto@calrecycle.ca.gov) – CalRecycle