



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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Director  
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**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

May 10, 2023

Diana Robinson

Imperial County Planning and Development Services Department

Planning Division Manager

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DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE TRUE NORTH ORGANICS RENEWABLE ENERGY FACILITY, DATED APRIL 2023, State Clearinghouse #**2023040047**

Dear Diana Robinson:

The Department of Toxic Substances Control (DTSC) has received the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the True North Organics Renewable Energy Facility Project (Proposed Project), dated April 2023. The Project is located on approximately 75 acres of vacant land in unincorporated Imperial County. True North Renewable Energy, LLC is undertaking the Proposed Project, consisting of development of a high solids anaerobic digestion facility with incidental advanced composting for the management and processing of residential, commercial, and industrial organic waste and green material.

Based on DTSC's review of the applicable sections of the Draft IS/MND, DTSC does not have significant concerns with the preparation of the document, or the implementation of

the planned design as described. However, below are DTSC's general comments regarding the Proposed Project:

- 1) Site Grading and Earthwork: Given the past agricultural use of the property, it is advised that any soils removed from the property are adequately characterized to ensure disposal at an appropriate waste handling facility, authorized to accept such materials. The sampling could include, but may not be limited to organochlorine pesticides, organophosphate pesticides, petroleum hydrocarbons and metals.
- 2) Hazardous Waste Management: Based on the description provided in the Draft IS/MND, general parameters for managing hazardous waste at the Proposed Project are outlined, but it appears that some details are still under development. As the details of the Proposed Projects' operations, pertaining to treating or disposing of hazardous waste are developed, DTSC advises consulting DTSC's Hazardous Waste Management Program/Imperial County Certified Unified Program Agency (CUPA) to ensure that:
  - Appropriate permits are acquired as necessary,
  - All requirements pertaining to hazardous waste management, containment and spill prevention are adequately evaluated, and
  - The Hazardous Materials Management Program/Hazardous Materials Business Plan meet California's regulatory standards for operations, as appropriate.
- 3) Ensure that waste streams are well defined for what can and cannot be accepted. Additionally, a mechanism should be in place to ensure that non-organic, hazardous, or otherwise unauthorized waste is not accepted. These added measures would prevent generation of hazardous waste, inadvertently treating hazardous waste, or accidentally releasing materials or waste into the environment.

DTSC appreciates the opportunity to review and comment on the Draft IS/MND. If you have any questions, please contact me at 714-484-5349 or via email at

[eileen.mananian@dtsc.ca.gov](mailto:eileen.mananian@dtsc.ca.gov).

Diana Robinson

May 10, 2023

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Sincerely,



Eileen Mananian, M.S.

Unit Chief

Site Mitigation and Restoration Program

Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and

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