



July 1, 2024

Rebecca Graves
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Subject: SCH No. 2024051344 – Draft Initial Study and Mitigated Negative Declaration (IS/MND): Purchase of Three Parcels from the City of Los Angeles by Inyo County, Without Water Rights, for the Continued Operations of the Bishop-Sunland, Independence and Lone Pine Landfills – Inyo County – Facility Numbers: 14-A A-0005, 14-AA-0004, and 14-AA-0003

Dear Rebecca Graves,

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 Draft Initial Study and Mitigated Negative Declaration (IS/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.

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 surrounding 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:

- The landowner would change from the Los Angeles Department of Water and Power (LADWP) to the County of Inyo
- The County of Inyo would construct waterlines within the easements to connect the Independence and Lone Pine facilities with the town water system
- Description of the parcels proposed for acquisition, to include the existing leased facility areas and the existing facility components, including the landfill gas (LFG) and groundwater monitoring well networks for each facility required by CCR Title 27, and current WDRs
- Update of the recently approved PCPCMPs for each landfill, for approval by the LEA and CalRecycle
- Update of the Joint Technical Document (JTD) / Report of Disposal Site Information (RDSI) and preparation of a Solid Waste Facilities Permit (SWFP) Revision (or modification) Application, for submittal to the LEA, CalRecycle, and LRWQCB
 - For Bishop-Sunland Landfill, revisions to the SWFP and JTD/RDSI are not anticipated, unless directed by the LEA, CalRecycle, or the LRWQCB
 - For Independence Landfill, the following changes to the JTD/RDSI and SWFP were proposed:
 - Reflect current operating days and hours: 2 days per week, Thursdays and Sundays, 7:30am to 3:30pm, exclusive of holidays
 - Update the total permitted capacity to reflect accurate survey data and match the approved PCPCMP
 - Change the maximum waste disposal rate from a daily maximum tonnage to a weekly maximum tonnage to allow more flexibility for disposal over the two operating days per week, and allow for occasional spikes in disposal rates (e.g., due to construction or demolition projects)
 - Update site life calculations, fill sequencing and closure date to reflect current waste-in-place, soil ratios and disposal rates, as well as updating the topographical base maps
 - Add types of waste accepted and other minor changes to reflect current operations and new regulatory activities
 - For Lone Pine Landfill, the following changes to the JTD/RDSI and SWFP were proposed:

- Reflect current operating days and hours: 5 days per week, Thursday through Monday, 7:30am to 3:30pm, exclusive of holidays
 - Update the total permitted capacity to reflect accurate survey data and match the approved PCPCMP
 - Change the maximum waste disposal rate from a daily tonnage to a weekly maximum tonnage to allow more flexibility for disposal over the five operating days per week, and allow for occasional spikes in disposal rates (e.g., due to construction or demolition projects)
 - Update site life calculations, fill sequencing and closure date to reflect current waste-in-place and disposal rates, as well as updating the topographical base maps
 - Add types of waste accepted and other minor changes to reflect current operations and new regulatory activities
- Revision of the WDRs with the LRWQCB to reflect property transfer and current Evaluation Monitoring Program (Lone Pine Landfill) and Corrective Action Program (Bishop-Sunland Landfill)
 - Continuation of LFG monitoring and reporting according to Title 27 requirements, groundwater monitoring and reporting according to current Monitoring and Reporting Programs (MRPs), 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

Comments

When preparing the Final MND, 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 SWFPs 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).

For Lone Pine and Independence Landfills, should the operators choose to move forward with the proposed changes to the permit, or should modification of parcel

boundaries result in a need to increase the permitted area for any of the facilities, revisions to the respective SWFPs would be required. Prior to implementation of those changes, the operator shall submit an application package for a SWFP 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 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 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,

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

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

Sarah Peterson, LEA
Inyo County Department of Environmental Health Services