



January 23, 2020

Governor's Office of Planning & Research

JAN 23 2020

STATE CLEARINGHOUSE

Ms. Nedzlene Ferrario
Solano County Department of Resource Management
675 Texas Street, Suite 5500
Fairfield, CA 94553
nferrario@solanocounty.com

Subject: SCH No. 2018032031 – Draft Subsequent Environmental Impact Report for Recology Hay Road Landfill Use Permit Amendment No. 2 – Solano County

Dear Ms. Ferrario,

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 Solano County Department of Resource Management, acting as Lead Agency, has prepared and circulated a Draft Subsequent Environmental Impact Report for the Recology Hay Road Landfill Land Use Permit Amendment No. 2 in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project. CalRecycle did comment on the Notice of Preparation (NOP) in preparing this Subsequent Environmental Impact Report (SEIR).

The project site is located on a 640-acre property at 6426 Hay Road, immediately west of State Route (SR) 113 and south of Hay Road, in the unincorporated area of Solano County. The site is approximately eight (8) miles southeast of the City of Vacaville and eight (8) miles south of the City of Dixon. The Recology Hay Road (RHR) Landfill consists of Assessor's parcel numbers 0042-020-060, 0042-020-280, and 0042-020-020.

The proposed project would involve:

- Addition of 24 acres to the disposal area which will result in an additional 8.8 million cubic yards to landfill disposal capacity.
- Addition of 16 acres to the facility boundary.

- Reduction of Jepson Prairie Organics (JPO) compost facility size from 39 acres to 38 acres. The one (1) acre reduction is part of the 24 acres that will be added to Recology Hay Road Landfill.
- Modification of the land use permit acknowledges that existing permitted monofill DM-1 (Disposal Module 1) extends beyond its originally defined footprint.
- Addition of baled recyclable material storage (temporary storage for 6 months).
- Increase landfill tonnage to 3,200 tons per day (TPD) averaged over a seven (7) day period with a peak daily tonnage of 3,400 TPD.
- Addition of construction and demolition sorting operation. This would involve addition of equipment to process/sort the material. The facility currently receives construction and demolition material but does not process.
- Addition of friable asbestos disposal into all disposal modules (DM) except for DM 2.1 on site. Currently disposal of friable asbestos is limited to Disposal Module 1.
- Expansion of soil borrow pit to accommodate increased need for soil associated with proposed landfill construction and operations.
- Addition of an enclosed landfill gas flare.

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 Draft Subsequent EIR, in addition to the specific location noted.

SWFP Entitlements for the Recology Hay Road Landfill Current and Proposed

- The proposed entitlement would increase the disposal acreage (footprint) from 256 acres to 280 acres.
- The proposed entitlement would increase the design capacity from 37,000,000 cubic yards to approximately 45,800,000 cubic yards.
- The proposed entitlement would add processing and sorting equipment on site to manage construction demolition material.
- Proposed entitlement would increase incoming tonnage limit from 2,400 tons per day to 3,200 tons per day averaged over a seven (7)-day period with a peak daily tonnage of 3,400 tons per day.
- Proposed entitlement would allow asbestos containing waste to be disposed of in all disposal modules except module 2.1. Currently disposal of friable asbestos is only allowed in disposal module 1.
- Proposed entitlement would adjust the estimated closure date of the facility from 2053 to 2038.

Estimated Closure Date

In section 3.7.1 of the subject document, it states that “The Triangle would result in an increase of approximately 8.8 million cubic yards to the landfill’s disposal capacity with the landfill footprint extended to the south and extending the estimated closure date to 2038.” Is this a typographical error? The current estimated closure date for this facility is 2053. Should this state “shorten the closure date?” Is the shortening of the closure date due to the increase in disposal capacity being too little to offset the increase in tonnage? The “Revised Notice of Preparation” circulated between August 31, 2018 to October 2, 2018 stated that the “Expansion of the landfill disposal area into the Triangle would increase the landfill's total disposal capacity by approximately 8.8 million cubic yards and extend the estimated life of the landfill by at least 5 years.” Should the correct date be 2058?

Solid Waste Regulatory Oversight

The Solano County Department of Resource Management is the solid waste Local Enforcement Agency (LEA) for Solano County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA Jagjinder Sahota at (707) 784-3308 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 Environmental Impact Report 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) 341-6119 or by e-mail at Harprit.Mattu@calrecycle.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Harprit Mattu". The signature is written in a cursive, flowing style.

Harprit Mattu, Environmental Scientist
Permitting & Assistance Branch – North
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Diane Vlach, Supervisor
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