



September 1, 2020

9/30/2020

Governor's Office of Planning & Research

Erik Krause, Deputy Director of Community Development
City of Glendale
633 East Broadway, Room 103
Glendale, CA 91206

Sep 01 2020

STATE CLEARINGHOUSE

Subject: SCH No. 2017081062 – Draft Environmental Impact Report for Biogas
Renewable Generation Project, Scholl Canyon Landfill (Facility No. 19-AA-
0012) – Los Angeles County

Dear Mr. Krause:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the Draft Environmental Impact Report (Draft EIR) and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The City of Glendale, acting as Lead Agency, proposes to construct and operate a 12-megawatt (MW) power generation facility that would utilize landfill gas (LFG) from Scholl Canyon Landfill, Facility No. 19-AA-0012, as fuel to generate renewable energy. The project site will be located entirely within the boundaries of Scholl Canyon Landfill, at 3001 Scholl Canyon Road, in the City of Glendale. The project specifically will be located adjacent to the existing LFG flare station and would include the following equipment and systems:

- LFG compressors to increase the LFG pressure;
- LFG treatment system;
- Condensate treatment system;
- Electrical generating equipment;
- Combustion exhaust gas cleanup system;
- Continuous emission monitoring systems;
- Electric switchgear to allow connection of the produced electricity to the existing electrical system;
- A small office and storage building (less than 1,000 square feet each);
- Fire protection and safety system; and,
- A 60,000-gallon fire water tank and a 10,000-gallon domestic water storage tank.

A 3,500 foot natural gas pipeline will be constructed that would connect the facility to the Southern California Gas Company pipeline system located at the eastern end of Scholl

Canyon Drive. A one-mile-long water pipeline will also be constructed that would connect the facility to an existing pipeline located north of the landfill, which will also allow the connection to fire hydrants. Additional water pipelines will be constructed below the power generation facility to connect the facility to the domestic water tanks. The existing five-mile-long gas pipeline will be abandoned. The entire project site will be enclosed within an eight-foot-high security fence with automatic gates and security and safety lighting systems.

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 EIR, in addition to the specific location noted. Comments on the Draft EIR are summarized below:

Pages 4.250 and 4.252, Section 4.10.3.1 Methodology – Tables 36 and 38 have the language, "Exiting Ambient Noise Level (dBA)." Please clarify if the word "Exiting" was misspelled and should be "Existing."

Page 4.251, Section 4.10.3.1 Methodology – At the end of the first paragraph, Appendix H is mentioned in regards to modeled noise level contour maps. The last paragraph also mentions Appendix H in regards to a list of equipment and assumed noise levels generated by the project. In the table of contents list of appendices, Appendix H is labeled as "Pre-Demolition Asbestos and Lead-Based Paint Survey." The appendix itself also provides the same information for pre-demolition asbestos and lead-based paint. Please clarify the accuracy of references to Appendix H in this section for noise.

Solid Waste Regulatory Oversight

Prior to the start of operation, the proposed project must be adequately described in the Joint Technical Document (JTD) for the Scholl Canyon Landfill. Per Title 27, California Code of Regulations (27 CCR), Section 21620, the operator shall submit proposed changes in design or operation to the Local Enforcement Agency (LEA) for review and approval at least 180 days prior to implementation. The Los Angeles County Department of Public Health is the LEA for Los Angeles County and responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. Please contact Dorcas Hanson-Lugo of the LEA at 626.430.5540 or dlugo@ph.lacounty.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 Draft EIR and hopes that this comment letter will be useful to the Lead Agency preparing the Final EIR 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.

Draft EIR for the Biogas Renewable Generation Project

September 1, 2020

Page 3 of 3

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 916.323.1799 or by e-mail at nai.teurn@calrecycle.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nai Teurn', with a long horizontal stroke extending to the right.

Nai Teurn, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Dorcas Hanson-Lugo, Chief
Los Angeles County Department of Public Health, LEA