



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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May 24, 2019

Governor's Office of Planning & Research

MAY 24 2019

STATE CLEARINGHOUSE

Kinika Hesterly, Urban/Regional Planner IV
Riverside County Department of Waste Resources
14310 Frederick Street
Moreno Valley, CA 92553

Subject: SCH No. 2019049142 – Notice of Intent to Adopt Mitigated Negative Declaration for Badlands Landfill Integrated Project, Environmental Assessment No. 2017-03 (Facility No. 33-AA-0006) – Riverside County

Dear Ms. Hesterly:

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 Riverside County Department of Waste Resources, acting as Lead Agency, has prepared and circulated a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (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 proposed Badlands Landfill Integrated Project (proposed project) is located at 31125 Ironwood Avenue near the City of Moreno Valley in unincorporated Riverside County. The proposed project would revise the landfill's Solid Waste Facility Permit (SWFP) to increase the permitted disturbance area from 278 acres to 811 acres, which includes expanding the disposal footprint from 150 acres to 396 acres (in multiple stages), thereby providing an additional 50 years of critically needed landfill capacity. Additionally, the project would increase the maximum permitted daily tonnage by 500 tons per day (tpd) from 4,500 tpd to 5,000 tpd, add an organic waste diversion operation, and allow for other minor administrative and operational changes. The project will not change the hours of operation or increase the permitted number of vehicles/trucks allowed at the landfill.

The organic waste diversion operation will include the receipt and processing of green waste, agricultural material, food material, manure, paper products, and digestate. Additives and amendments include, but are not limited to, fertilizers, urea, peat moss, and gypsum. Processing of feedstock will involve chipping and grinding and



composting in windrows and aerated static piles. The proposed organics operation introduces a different option for processing the existing 300 tpd of organics permitted for beneficial reuse and will be included as part of the proposed daily throughput of 5,000 tpd.

Summary of Design Parameter Changes for the Proposed Project

	Current Design Parameters as stated in Issued SWFP	Proposed Design Parameters
Daily Throughput	4,500 tons- Disposal 300 tons – Beneficial Reuse	5,000 tons
Days and Hours of Operation	Receipt of Refuse/Waste: 4:00AM – 8:00PM, Monday – Sunday Maintenance/Ancillary Operations: 24 hours per day, 7 days per week Facility closed on the following: New Year's Day, Memorial Day, Independence Day, Sunday prior to Labor Day, Labor Day, Thanksgiving Day, Christmas Day, and other days as per Riverside County Ordinance 358	No change
Daily Vehicle Trips	612	No change
Total Area	278 acres	811 acres
Disposal Area	150 acres	396 acres
Design Capacity	34.4 million cubic yards	86 million tons (cubic yards not stated)
Maximum Elevation	2,460 feet mean sea level	No change
Maximum Depth	275 feet mean sea level	320 feet below surface grade
Estimated Closure Year	2022	2073

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 MND, in addition to the specific location noted.

Comments for the MND are summarized in the table below:

Chapter/Section	Page and Location	Comment
Organic Waste Diversion	Pg. 16-19	Will the organic waste diversion activity be included as part of the landfill's SWFP (33-AA-0006)? If so, will the 300 tpd of organics

		<p>accepted as part of the organic waste diversion activity be included as part of the proposed daily 5,000 tpd?</p> <p>What is the maximum amount of compost this operation plans to produce annually?</p> <p>How long will the finished product be stored on-site?</p> <p>What is the site design capacity (maximum amount of all material including additives, amendments, feedstock, active compost and finished materials present at any one time)?</p> <p>Note: A Report of Composting Site Information (RCSI) and an Odor Impact Minimization Plan (OIMP) shall include information on how the activity will comply with the requirements of Title 14 of the California Code of Regulations, Section 18227 and 17863.4.</p>
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Environmental Document Checklist for Compostable Material Handling Facilities

The following internet links access a checklist and available resources developed by CalRecycle staff to assist Lead Agencies in the preparation of environmental documents for compostable materials handling operations/facilities:

<https://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Compost/>

Solid Waste Regulatory Oversight

The Riverside County, Department of Environmental Health, as the Local Enforcement Agency (LEA), and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities such as solid waste landfills and compostable material handling activities, including permitting, inspections, and enforcement. The permitting and regulatory requirements for these operations/facilities are contained in Title 14 and Title 27 of the California Code of Regulations.

Please note that the authority for complaints pertaining to odors emanating from a composting facility is under the authority of the LEA pursuant to Public Resources Code, Section 43209.1. For your reference, the following link to CalRecycle's webpage provides best management practices for compostable material handling activities:

<https://www.calrecycle.ca.gov/swfacilities/compostables/bmp>

The LEA contact for this proposed project is Greg Reyes and he can be reached at 951.955.8980 or by e-mail at GJReyes@Rivco.org. Please contact the LEA to discuss the solid waste facility 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 by phone at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Sincerely,



for

Megan Emslander, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Martin Perez, Supervisor
Permitting & Assistance Branch – South Unit

Greg Reyes and Mark Abbott – Riverside County LEA