



## DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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May 22, 2019

Governor's Office of Planning & Research

MAY 22 2019

STATE CLEARINGHOUSE

Don Bartz  
Phelan Pinon Hills Community Services District  
4176 Warbler Road  
Phelan, CA 92371

**Subject: SCH No. 2019049127** – Notice of Completion of an Initial Study/Mitigated Negative Declaration (MND) for Circle Green “Green Tech” Project, (Solid Waste Information System Number 36-AA-0500), San Bernardino County

Dear Mr. Bartz:

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

### **PROJECT DESCRIPTION**

The Phelan Pinon Hills Community Services District, acting as Lead Agency, has prepared and circulated a Notice of Completion of an Initial Study/Mitigated Negative Declaration 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 project site is the former Meadowbrook Dairy located at 17900 Sheep Creek Road in unincorporated San Bernardino County within the Phelan Pinon Hills Community Service District. There is an office building and a single-family home on-site. There is also an existing solar generation farm on the northeast corner of the site. The site can be accessed from both Highway 14 and Highway 138. The proposed project consist of 80 acres and the land use/zoning designation is Agriculture and Rural Living. The existing on-site residence is occupied by the project manager for 24 hour security and site supervision.

The proposed project will allow for the receipt and composting of vegetative material, pre and post-consumer food waste, green waste, digestate and cow manure. The maximum daily throughput capacity is 1,800 tons. The composting methods will be turned windrows or aerated static piles, depending on the feasibility of the implementation method. The project anticipates a maximum of 95 truckloads of food, green waste, digestate, manure, and amendments per day. The site will operate seven



days per week, and some operations will occur 24 hours a day. There will be a bagging operation on-site for a portion of the finished products.

**Summary of Design Parameters for Proposed Project**

<b>Daily Throughput</b>	1,800 tons per day
<b>Days and Hours of Operation</b>	24 hours per day, seven days per week
<b>Materials Type Received</b>	Food waste, green waste, digestate, and manure
<b>Daily Vehicle Trips</b>	95 truckloads
<b>Total Project Area</b>	80 acres

**COMMENTS**

The project description and analysis provided in the MND will be reviewed as part of CalRecycle's consideration of concurrence in a Solid Waste Facilities Permit for the project. The MND project description and analysis should be clear on the specifications and the key design and operation parameters (e.g., acreage, design capacity, handling, composting/processing, storage, etc.) analyzed for the proposed project.

Where a specific location in the document is noted for comment, please ensure the comment is addressed throughout all section of the MND, in addition to the specific location noted.

Comments for the MND are summarized in the table below:

<b>Section</b>	<b>Page</b>	<b>Comment</b>
Project Description	3	<p>What is the maximum amount of compost this facility plans to produce annually?</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>Initially, the proposed project will receive mostly vegetative material. Please identify and describe the phased operational scenario in more detail.</p> <p>Will there be a daily tonnage limit for each type of material to be received? If so, describe the tonnage limits.</p>

Section	Page	Comment
		<p>What specific types of site activities will be occurring 24 hours per day, seven days a week? Please describe in more detail, including the hours of waste receipt, material processing, ancillary activities, etc.</p> <p>Will the site be open to the public and self-haulers?</p> <p>What is the maximum amount of time each feedstock will be stored on-site prior to adding to the windrows or static pile?</p> <p>How long will the finished product be stored on-site?</p> <p>If any end product is used for land application, the material would be required to meet the definition for land application per Title 14 of the California Code of Regulations, Section 17852(a)(24.5).</p>
Appendix 1 – Odors	14	<p>The nearest sensitive uses identified were the Lake Los Angeles housing tract and the Lake Los Angeles School located 11-12 miles away from the site. Will the residents located across the street and immediately to the north and to the east of site be directly impacted by odors generated by the proposed project? If so, what specific best management practices will be taken to mitigate any potential odor impacts?</p>

**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 San Bernardino County Department of Public Health, Division of Environmental Health Services, as the Local Enforcement Agency (LEA), and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities such as compostable material operations/facilities, 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 Genelle Guzman and she can be reached at (800) 442-2283 or by e-mail at [genelle.guzman@dph.sbcounty.gov](mailto:genelle.guzman@dph.sbcounty.gov). Please contact the LEA to discuss solid waste permitting requirements for this proposed project.

### **CONCLUSION**

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on this environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

CalRecycle staff request copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this 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 project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at (951) 782-4168 or by e-mail at [Dianne.Ohiosumua@CalRecycle.ca.gov](mailto:Dianne.Ohiosumua@CalRecycle.ca.gov).

Sincerely,



for

Dianne Ohiosumua, Environmental Scientist  
Permitting and Assistance Branch – South Unit  
Waste Permitting, Compliance and Mitigation Division

cc: Martin Perez, Supervisor  
Permits and Assistance South Unit

Jim Nichol,  
Environmental Health Supervisor  
County of San Bernardino, Public Health Department – LEA

Genelle Guzman  
County of San Bernardino, Public Health Department - LEA