



Department of
Resources Recycling and Recovery

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Secretary for
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December 2, 2019

Governor's Office of Planning & Research

Ronelle Candia,
2700 M Street, Suite 100
Bakersfield, CA 93301
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DEC 02 2019

STATE CLEARINGHOUSE

Subject: SCH No. 2019100659 - Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Lost Hills Composting and Waste to Energy Project by Lost Hills Environmental LLC. Modification No.2, CUP No.9, Map 28: Modification No. 1, CUP No. 1, Map 28; and issuance of new CUP 13, Map 28 (PP18111) aka, H. M. Holloway Inc. Landfill, Facility No. 15-AA-0308, Kern County

Dear Ms. Candia:

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. If the proposed project description below varies substantially from the project as understood CalRecycle as a responsible Agency, CalRecycle staff requests clarifications of any comments or interpretations of the project references be included in the Final Environmental Impact Report.

PROJECT DESCRIPTION

The proposed project is located at 14045 Holloway Road Lost Hills CA and is owned and operated by Lost Hills Environmental LLC. The proposed project includes a request for land use entitlements necessary to facilitate the expanded and continued use of a Class III Non-Hazardous Industrial Waste Landfill facility and the establishment of a new Waste to Energy Biomass Gasification Facility. Implementation of the proposed project will require the following:

- a) Amendment to the boundaries of the CUP No.1, Map 28 of the existing mining facility to remove six (6) acres of the project site, which will become the location for the proposed Waste to Energy Biomass Gasification Facility.
- b) Establishment of a new CUP No. 13, Map 28 that would facilitate construction of a 3 megawatt (MW) (net) Waste to Energy biomass gasification facility.
- c) Amendment to CUP No. 9, Map 28 of the existing Class III Non-Hazardous Waste Landfill to include:

- A revision in the allowable waste streams permitted at the landfill to allow the acceptance and disposal of various materials, with a maximum of 1000 tons per day of organic material;
- A revision to allow for an increase in permitted hours of operation, tonnage, and traffic volume and;
- A new 640,000 ton per year (tpy) extended aerated static pile (eSAP) composting facility sited on 136.2 acres within the current landfill facility boundary. Material accepted for composting at the facility would include up to 320,000 tpy of biosolids, green waste, food waste, and manure; and up to 320,000 tpy of wood waste for a total 640,000 tpy. All compostable materials would be chipped and ground off-site. Incoming feedstock material would come from locations within a 150-mile radius. Biosolids and manure would be accepted from within 200-mile radius and wood and green waste would be primarily accepted from Kern County farmers and the City of Bakersfield Mt. Vernon Recycling and Compost Facility. At full buildout the composting and curing will occur within 240 compost pads.

The project includes the construction and operation of a new extended aerated static pile composting activity on a portion of the landfill (Pit E) that has reached capacity (to occur in 3 phases over 10 years), additional waste stream types to be disposed of within the landfill, and to extend the hours of operation to 24 hours a day, 365 days per year. Vehicles accessing the site per day (vpd) would increase from 91 vpd to 313 vpd.

The approved waste types allowed for disposal consist of Class A and B biosolids, Treated Auto Shredder Waste, Cogeneration Ash (Fly Ash), spent Sand Blast Media, and Lime Filter Cake. The proposed additional waste types consist of CDI materials, Agricultural Materials, Green Waste, Granulated Silica, Wastewater Sloughing. Allowing for up to 1000 TPD of organic material.

COMMENTS

CalRecycle staff's comments on the proposed project are included below. Please ensure the comments will be addressed throughout all sections of the NOP. Implementation of the proposed project is likely to require a revision to the existing H. M. Holloway Landfill Inc. Solid Waste Facilities Permit (SWFP). This permit revision will require action by CalRecycle as a responsible agency. CalRecycle will need to utilize the CEQA document to support its concurrence on issuance of the permit by the Local Enforcement Agency.

DAILY TONNAGE

Please provide clarification as to whether the increase in the types of material accepted (1000 tons of organics) will affect the maximum daily tonnage disposed of at the landfill which is currently permitted for 2000 TPD.

LANDFILL CLOSURE/CLEAN CLOSURE

It is unclear from the Notice of Preparation project description how the landfill closure at the portion of Pit "E" that has reached capacity will occur. The FEIR should provide additional details of this aspect of the project including the type of closure activity planned and where materials removed will be

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disposed. Any landfill closure plan whether, complete/final, partial, or clean closure activities are subject to review and approval by the Local Enforcement Agency, CalRecycle, as well as the Central Valley Regional Water Quality Control Board.

SOLID WASTE REGULATORY OVERSIGHT

The Kern County Department of Environmental Health is the Local Enforcement Agency (LEA) and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Karen Sanford at 661-862-8703 or KARENS@kerncounty.com 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 NOP 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. CalRecycle staff may have further comments on the project as proposed copies of the Final Environmental Impact Report, Findings and Statement of Overriding Considerations (if one is required), Mitigation Monitoring and Reporting Program, Public Notices and any Notices of Determination.

If you have any questions regarding these comments, please contact me at 916.341.6304 or by e-mail at Christine.Karl@calrecycle.ca.gov.

Sincerely,



Christine Karl
Environmental Scientist
Permitting & Assistance Branch, North Section
Waste Permitting, Compliance & Mitigation Division

cc: Diane Vlach, Supervisor
Permitting & Assistance Branch – North Unit

Karen Sanford, Supervisor
Kern County Environmental Health Department

