



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for
Environmental Protection

Scott Smithline
CalRecycle Director

November 4, 2019

Governor's Office of Planning & Research

NOV 04 2019

STATE CLEARINGHOUSE

Ms. Rebecca Deming
Community Development Director
City of Desert Hot Springs
65950 Pierson Boulevard
Desert Hot Springs, CA 92240

Subject: SCH No. 2019109020 – Mitigated Negative Declaration for Coachillin' Anaerobic Digester Facility on APN 666-360-015 – Riverside County

Dear Ms. Deming:

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 City of Desert Hot Springs, acting as Lead Agency, has prepared and circulated an Initial Study/Mitigated Negative Declaration (IS/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 Coachillin' Anaerobic Digester (AD) facility on APN 666-360-015 (proposed project) is located in the City of Desert Hot Springs, Riverside County, California. The proposed project site is located east of Indian Canyon Drive, between 18th and 19th Avenue. The proposed project facility will be located on an approximate 9.76 acre parcel north of 19th Avenue and east of Calle De Los Ramos, zoned Light Industrial. Surrounding land uses within two miles of the proposed project site is State HWY 62, Whitewater River, Palm Springs International Airport, Palm Springs Amtrak Station, and Two Bunch Palms Elementary School.

The proposed project will accept up to 250 tons of organic material per day. The proposed project will include a 6,084-square-foot administrative and control building to direct the operations receiving, material handling and processing through production, shipping and sales. The proposed project will also include a 25,350-square-foot organic waste material receiving building that will accept delivery of the weighed organic material and grind the organic product for delivery to the multi-stage anaerobic digesters. The proposed project will take approximately one year to build. The proposed project will incorporate up to five multi-stage 1,750-ton digesters. The digesters will be developed in stages to accept the processed organic

material. Liquid and solid fertilizer produced during the AD process shall be separated and transported to 600-ton liquid fertilizer mixing and conditioning tanks and solid fertilizer aeration and conditioning bunkers for transport and/or sale. Excess liquid organic matter (if any) will be removed to a retention tank to be combined with additional organic material to be reprocessed by the ADs at a later date by a sand filter pump. The retention tank will also act as a retention basin to accept excess drainage to be mixed and sent to the AD. The carbon dioxide and methane gas by-product will be transported to low pressure gas balloons. The power generated by the pressurized gas will then be sent back into the system under a power purchase agreement. A 3.6-megawatt turbine will also be utilized to send high pressure gas to the Coachillin' Specific Plan development located west of the site for end user cogeneration. The proposed project site will be fenced for security and will be accessed by 19th Avenue, which will be paved from the site to Indian Canyon Drive as part of the Proposed Project. Calle de los Ramos will also be paved to a half-width to accommodate traffic from 18th Avenue via Indian Canyon Drive as part of the adjacent Coachillin Specific Plan. The proposed AD facility will incorporate drought tolerant landscaping across the 19th Avenue frontage as required by the City. The proposed project's operations will be phased over approximately 10 years to allow for start-up and growth in organic waste recycling demand.

COMMENTS

CalRecycle staff's comments on the proposed project are included below. Please ensure the comments will be addressed throughout all sections of the IS/MND.

Solid Waste Regulatory Oversight/In-Vessel Digestion Facility Permit

Per CalRecycle and Local Enforcement Agency oversight, the proposed location does not have a current solid waste facility permit to operate an In-Vessel Digestion Facility. Before the proposed project commences the operator will need to apply for and obtain a Full Solid Waste Facilities Permit (SWFP) from the Local Enforcement Agency (LEA). The permitting and regulatory requirements for in-vessel digestion operations and facilities are contained within Title 14 and/or 27 CCR: <https://www.calrecycle.ca.gov/laws/regulations>.

The Riverside County, Department of Environmental Health is the LEA and is responsible for providing regulatory oversight of solid waste handling activities, including in-vessel digestion operations/facilities, relative to permitting, inspections and enforcement. Please contact the LEA, Mark Abbott at 760.863.7570 or Greg Reyes at 951.955.8980, to discuss the permitting requirements for the proposed project.

The following internet links developed by CalRecycle provide information and resources for permitting an in-vessel digestion facility or operation:

<https://www.calrecycle.ca.gov/swfacilities/permitting/facilitytype/invessel>

In-Vessel Digestion Report

Each operator of a Large Volume In-Vessel Digestion Facility that is required to obtain a Full SWFP, shall at the time of application, file an In-Vessel Digestion Report pursuant to 14 CCR, Section 18221.6.1.

Maximum Daily Tonnage

The IS/MND includes statements of accepting 50-495 tons of feedstock, 250 tons and also a capacity of 1750 tons. A table on page 12 of the IS/MND lists a phased approach broken into 5 stages starting at 50-100 tons and the last stage at 250-490 tons. Provide consistency of tonnages throughout the entire document, elaborate on what the proposed project's maximum daily tonnage will be and describe what the tonnage amounts are that the document is analyzing for potential impacts.

Land Application Requirement Applicability

The liquid and solid digestate that will be sold as a soil amendment may be subject to the land application requirements pursuant to 14 CCR Section 17852(a)(24.5)(A). The following internet link developed by CalRecycle staff provides the LEA and other interested parties with information regarding the land application of compostable material and/or digestate: <https://www.calrecycle.ca.gov/lea/regs/implement/landapp>.

CONCLUSION

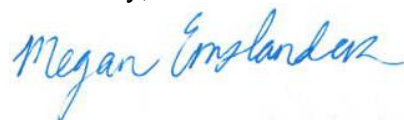
CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the IS/MND and in carrying out their responsibilities in the CEQA process.

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 me at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Sincerely,



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

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

Mark Abbott, Supervisor
Riverside County LEA

Greg Reyes, Supervisor
Riverside County LEA