



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for
Environmental Protection

Scott Smithline
CalRecycle Director

January 3, 2020

Governor's Office of Planning & Research

JAN 03 2020

STATE CLEARINGHOUSE

Mr. Jim Morrissey
Jim.Morrissey@lus.sbcounty.gov
San Bernardino County
Land Use Services Department
385 N. Arrowhead Avenue
San Bernardino, CA 92415

Subject: SCH No. 2019119083 – Initial Study/Mitigated Negative Declaration
Panamint Valley Limestone Conditional Use Permit – San Bernardino
County

Dear Mr. Morrissey:

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 County of San Bernardino, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of 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 Panamint Valley Limestone Processing Plant (proposed project) is located west of the intersection of Trona Road and Athol Street in Trona, Assessor Parcel Number 0485-031-12. The project site is approximately 62 acres, and the site is currently zoned Regional Industrial. The site is surrounded by Floodway to the north, Searles Valley Minerals to the south and west, and vacant land and a cemetery to the east.

The proposed project is to construct an industrial lime production plant on land that was previously used as an ash disposal site.

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 IS/MND, in addition to the specific location noted.

This site was previously permitted as a non-hazardous ash disposal site that operated under a Standardized Non-Hazardous Ash Solid Waste Facility Permit issued to Ace Cogeneration Company (SWIS No. 36-AA-0311). The non-hazardous ash disposal site was required to be restored pursuant to Title 14, California Code of Regulations (14 CCR), Section 17379.1. The restoration of the site was completed in June 2017. It is unclear in the IS/MND if the disposal site's cover that was placed during the restoration will be impacted by the proposed project. Will any of the previously disposed ash be excavated/relocated/consolidated? If so, the extent and handling of the ash should be described and any potential impacts analyzed in the IS/MND.

It appears from Figures 4 and 5 that the limestone plant structures and other operational aspects will be constructed on parts of the ash disposal site. What measures will be implemented to maintain the cover and other measures that were completed and approved by the solid waste local enforcement agency as part of the site's restoration to ensure protection of the public health, safety and environment from the non-hazardous ash disposal site?

Solid Waste Regulatory Oversight

The San Bernardino County Environmental Health Services is the Local Enforcement Agency (LEA) for San Bernardino County and responsible for providing regulatory oversight of solid waste handling and disposal activities. Please contact the LEA, Kimberly Tra, at 800.442.2283 to discuss potential 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.

IS/MND for Panamint Valley Limestone

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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 appreciates the lead agency's approval for the additional time to review and provide comments on the IS/MND.

If you have any questions regarding these comments, please contact me at 916.341.6413 or by e-mail at jeff.hackett@calrecycle.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Hackett", is positioned above the typed name.

Jeff Hackett, Manager
Permits & Assistance South Section
Waste Permitting, Compliance & Mitigation Division

cc: Benjamin Escotto, CalRecycle
Kimberly Tra, San Bernardino County Environmental Health Services, LEA