

**--- West Contra Costa Sanitary Landfill, Inc. ---**  
**MEMORANDUM**

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December 22, 2003

To: Deidra Dingman

From: Larry Burch

**Subject: COMMENTS ON DRAFT EIR**

The following are our comments derived reviewing the Draft EIR for the WCL Bulk Materials Processing Center and Related Actions.

**COMMENTS**

- The Public Access Trail opening date given on Pg 2-4 & Pg 3-42 of the DEIR and Pg 13 of Appendix 3K as December 1, 2003 turned out to not be practical since the permits are still in progress. It appears that the opening date will be spring 2004. 17-1
- The possible PM<sub>10</sub> emissions exceedance issue listed on Pg 2-7 indicates the possible action of deleting an entire operation to reduce the emissions. We suggest another alternative should be listed instead – downsizing the operation to be within the emissions limit when the appropriate emission control equipment and measures are implemented (e.g. smaller composting & concrete crushing operations). The sizing of the facilities probably will be determined by the Permits issued by the BAAQMD. Downsizing may not be necessary. 17-2
- Pg 2-9 & Pg 3-35 contain references to the landfill site life expiring in October 2003 if the Soil Stockpile Building remains in place. Excavation of the landfill final cover found greater than anticipated settlement (creating more disposal space) and waste burial operations have achieved higher rates of compaction. The expected date with the building still in place now is May 2004. Note that the reference to Table 3-5 in Chapter 3 should be to Table 3-6. The dates in the table will be updated in our reports due to the RWQCB and County LEA in January 2004. 17-3
- Pg 2-15 contains a summary of Mitigation Measure 4-5. This subject is also described on Pg 4-23. If approved, we must conduct an investigation of reports of illegal dumping within 24 hrs, and if the incident is verified, the dumped materials must be removed within 24 hrs after verification (removal within 48 hours of

- reporting). This appears to be a very tight schedule for incidents reported where the weekend occurs within the 48 period, and would require overtime work for removal on a Holiday weekend. We request that the period be reasonably extended. We would like the County staff to have administrative leeway in setting the time periods. 17-4
- Pg 2-28 & Pg 9-15 – Impact 9-3: Our discussions with the Save-the-Bay Association representatives regarding the outer levee serving as a launch site for the Kids in Canoes Program centered on a type of launching float that would be simple and environmentally friendly. Ramps or floats used at other bayside locations would provide guidance on the type of facility to be provided. Corps and BCDC authorizations would be obtained. Actually, as part of the Public Access Trail Plan cooperative action with other interested entities, we hope that all agencies and entities can work together mutually to create this new recreational and educational resource. 17-5
  - Pg 2-30 & Pg 10-18 – Mitigation Measure 10-1 (f) indicates the exposed stockpile dust control program should include twice daily watering. Experience at the WCCSL indicates that with the amount of clay and silt in the local soils, once the pile exterior has been wetted with water, it forms a hardened crust, thus preventing dust occurrence. Multiple watering daily is not necessary, and watering should be done as needed to control dust. 17-6
  - Pg 2-31 and Pg 10-19 indicate the applicant-proposed control of paving the roads, unloading areas and the processing area of the “WRC”. It should be noted that the WRC includes both the mixed waste handling area and the organics processing area. We plan to provide such paving at the mixed waste handling area (the recycling and transfer station). Due to being located on the top of the landfill, no paving is planned at organics processing facility. Over time after the majority of the initial landfill settlement has occurred, some areas of the organics receiving and processing facility may be paved. 17-7
  - Pg 2-31, Pg 2-45 (b), Pg 10-19 & Pg 11-29 – Watering of green materials as they are being unloaded is not necessary. These materials are not normally sources of dust during unloading. The surfaces of the unloading areas are routinely sprayed with water during the dry weather. The materials periodically are watered during the dry weather prior to grinding, to avoid dust production during the grinding operation. 17-8
  - Pg 2-34 & Pg 10-27 reference a proposed 1-year composting demonstration project as Mitigation Measure 10-5. The odor-monitoring program could involve relatively intensive observations by an odor panel. We request the opportunity to help design the program with the regulatory agencies and develop a protocol for use of the odor panel, including the identification of the points where monitoring will be conducted. We agree that the multi-materials composting program does need to be well operated to assure no odor nuisances are created. 17-9
  - Pg 2-36 – The OIMP was not developed to govern the WRC mixed waste area. It applies to the organics processing area of the WRC and the composting operation. 17-10
  - Impact 11-2 on Pg 2-42 & Pg 11-20 references the location of the hazardous materials site (HWMF) and we concur that the potential impact on the project is less than significant. This is consistent with the findings of the 2000 EIR prepared by the 17-11

DTSC for the HWMF. During the closure process between 2000 and 2003, the HWMF was fully capped and will be permanently fenced in 2004. No access by the public will be allowed under the Postclosure Permit issued in August 2003 by DTSC.

- Pg 2-42 & Pg 11-21 includes Impact 11-3 regarding control of diesel spills and other chemicals during project construction and operation. The Applicant-proposed control measures should have included the fact that our contract agreements with builders and tenant operators contain such control measures. We have planned that the new operations where pollutant substances could be released in rainfall runoff will be governed by specific mention in the SWPPP. As we update the various reports needed for the permits we will include this mitigation measure (i.e. reports for the WRC, composting, waste solidification). 17-12
- Impact 4-2 on Pg 4-13 covers the subject of the WRC being adjacent to the proposed Public Access Trail. We concur that this does not create any significant environmental impacts. Experience has been gained at the Central IRRF regarding co-existence of that industrial processing operation and the Wildcat Creek Public Access Trail. Along the south property line of the Central IRRF a soil berm was erected, and a fence was placed on top of the berm. This location is next to the trail. Since the Central IRRF is adjacent to homes, the fence was added to serve as an additional noise barrier. This experience will be used to guide the design of the WRC if developed at the Area A site. Along the two sides of Area A facing the trail, a soil berm would be placed 8 feet high. Thus, this will provide a noise barrier and visual screen to persons walking on the trail. A security fence will also be placed on the berm. The fence will be covered with vegetation, or visibility-screening material will be attached. It is fortunate that the Central IRRF/Wildcat Trail co-location venue, yet unrelated functions have successfully provided a real example and precedent in the West County area to follow. 17-13
- Pg 4-20 & Pg 4-23 reference the Mitigation Fee under Mitigation Measure 4-5 as being “consistent with the existing mitigation fee collected at the Central IRRF”. We presume that this means that the landfill operation will not be governed by this measure while it remains in active operation. And, within our project, the fees will be applied to only the MSW materials received at the WRC mixed waste processing facility. The fee would not be levied on the compostibles, wood wastes, concrete and asphalt debris, waste soil, solidified materials, dredged materials, and biosolids. Such an application of the fee on these materials would be counterproductive in expanding waste diversion and recycling. 17-14
- Pg 5-10 & Pg 6-4 – The reference to pumping the Class II site leachate to the sludge lagoons is incorrect. The leachate will be pumped into a new pipeline system that will allow the Class II leachate (but not HWMF leachate) to be transported to the City of Richmond Wastewater Treatment Facility (WWTF) through the existing sludge transport pipeline when the pipeline is not in use for sludge disposal from the Richmond plant. These are facilities requested and financed by the East Bay Municipal Utilities District (EBMUD). 17-15
- Pg 5-10, Pg 6-4 & Pg 6-13 The Class II leachate technically will not be “directly” pumped to the City of Richmond WWTF. Through the agreements in place with the 17-16

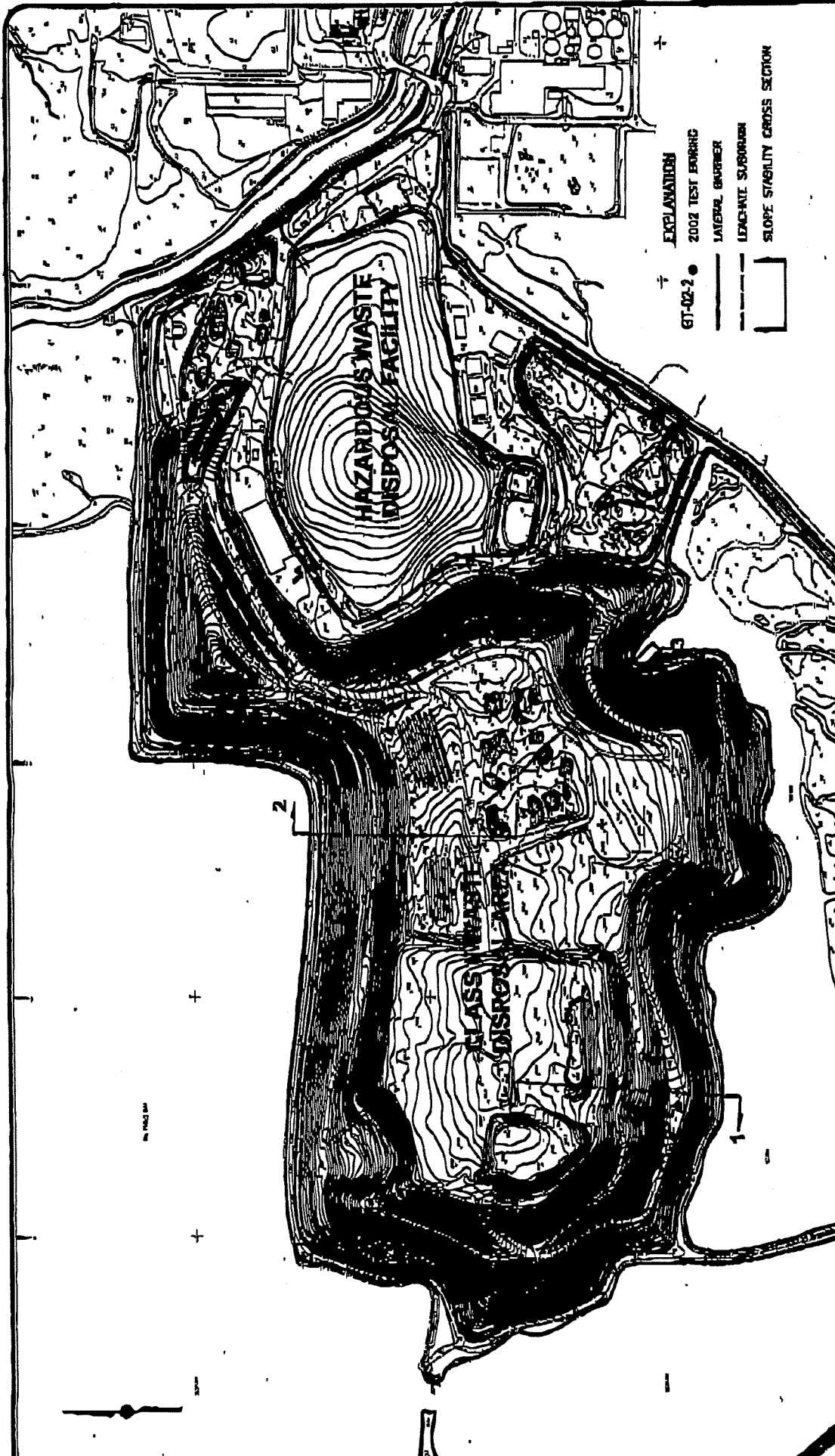
WCWD and the City, the leachate will be pumped to WCWD, which in turn will send it on to the Richmond plant. The WCWD is the discharger of the leachate to the City WWTF.

- Pg 5-17 – The further study of liquefaction was postponed until 2004 while awaiting the RWQCB review of the documents submitted by WCCSL, Inc. during 2003. 17-17
- Pg 12-5 & Pg 12-11 – The landfill gas-fired power plant noise adjacent to the trail will be reduced after a 8 foot high security/visual barrier berm is in place. 17-18
- Appendix 3H Biosolids Management Plan Summary – Discussions with the WCWD staff indicate a number of changes should be made in this Appendix. We will provide an update and provide it to the County staff. The subjects of the recommended changes include: (A) indicating that the analysis in the appendix of spreading liquid sludge on the landfill slopes was based upon handling only the WCWD sludge. The existing drying lagoons annually handle another almost equal amount of sludge from the Richmond WWTF. (B) The concept of returning the runoff water to the WCWD plant needs further study. Currently the incident rainfall on the lagoons is gravity drained (not pumped) into the WWTF, and it may be a smaller volume of water than will be generated off of the spreading area slopes of the landfill. (C) Also, the handling of the slope water generally will need to be done during and after a major storm event, which could cause operational difficulties at the WWTF, which also would be coping with added wastewater inflow from the sewerage system at that same time. (D) The slope spreading of liquid sludge was indicated in the appendix as involving several weeks between subsequent applications. With the volume of sludge produced during the dry weather season, much shorter times may exist between applications, thus shortening the drying time for the previously applied materials. (E) The discussions have pointed out the limited practicality of the liquid sludge applications on the landfill slopes in satisfying the goal of reducing the WWTF dependence on the drying lagoons. 17-19

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This completes our comments on the draft EIR. We believe that the document is quite factual regarding our proposed project and is thorough and well prepared. If you have questions concerning our comments please contact me at (510) 262-1662.

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**EXPLANATION**

- BT-02-2 ● 2002 TEST BORING
- LATERAL BARRIER
- - - LEACHATE SUBSIDER
- SLOPE STABILITY CROSS SECTION

**FIGURE 2**  
**WEST COUNTY LANDFILL, INC.**  
**WEST CONTRA COSTA SANITARY LANDFILL**  
**RICHMOND, CALIFORNIA**  
**LOCATIONS OF TEST BORINGS AND**  
**SLOPE STABILITY CROSS SECTIONS**

DATE: JUNE 2003
DRAWN: EAB
APP: _____
REV: _____
PROJECT NO: 20034-2003XX



Topographic base computed using photogrammetric methods by Cadwraig. Date of photography: May 31, 2002.

**Shaw-EMCONOWT, Inc.**