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December 22, 2003

Contra Costa County
 Community Development Department
 651 Pine Street, 4th Floor, North Wing
 Martinez, California 94553
 Attn: Deidra Dingman

DEC 22 PM 2:43

Subject: Draft Environmental Impact Report, State Clearinghouse #2002102057
 Proposed Amendment of Land Use Permit (LP#022026) at the West
 Contra Costa Sanitary Landfill, Facility No. 07-AA-0001

Dear Ms. Dingman:

Contra Costa Environmental Health, as the Local Enforcement Agency (LEA) for solid waste and as a responsible agency in this CEQA process, has reviewed the Draft Environmental Impact Report (EIR) for the West Contra Costa Sanitary Landfill (WCCSL) and provides the following comments.

COMPOSTING

1. The Aerated Static Pile Composting Demonstration Project would require a CIWMB Notification Tier approval for Research Composting Operations. The LEA will work with the operator for proper approvals and details. The California Code of Regulations, Title 14 Section 17862 describes the limitations placed on this activity. This includes "...shall not have more than 5,000 cubic-yards of feedstock, additives, amendments, chipped and ground material, and compost on-site at any one time..." 7-1
2. On page 3-26 of the EIR, is there a misprint in Table 3-4? For composting, it indicates that 450 TPD of materials are received, 504 TPD are recycled, and 45 TPD are landfilled. $504 + 45 = 549$, not 450. 7-2
3. What is the noise impact from the blowers utilized at the aerated static piles? 7-3
4. When the aerated static piles are broken down into windrows for 6 months for stabilization and maturation, what type of monitoring will be conducted to prevent fires, odors, and contamination with uncomposted material that may have pathogens in it? 7-4
5. Provide a drawing that clearly identifies the flexible compost/asphalt/concrete processing facilities boundary. Show the *maximum* western side of the compost operation and *maximum* eastern side of the asphalt/concrete processing facility. 7-5



6. What is the peak amount of compostable materials (feedstock, amendments, additives, final product, etc.) on site at any one time? What happens if it reaches peak capacity? 7-6
7. What type of lighting will be provided for after-dark activities? 7-7

ASPHALT/CONCRETE PROCESSING

1. Provide a drawing that clearly identifies the flexible compost/asphalt/concrete processing facilities boundary. Show the *maximum* western side of the compost operation and *maximum* eastern side of the asphalt/concrete processing facility. 7-8
2. What type of lighting will be provided for after-dark activities? 7-9
3. Appendix 3C indicates that wastewater "...not be allowed to pond at the site, *unless under a controlled manner.*" As this operation will be located on top of the closed landfill, and no ponding is allowed under the solid waste regulations, all steps must be taken to prevent ponding. 7-10

WASTE RECYCLING CENTER

1. In order to issue a solid waste facility permit (SWFP) for this facility, the LEA needs to make a finding that it is identified in and in conformance with the County Integrated Waste Management Plan (CIWMP). This includes specification of the site location. The CIWMP will need to be amended to include this facility. 7-11
2. What is the maximum capacity of the WRC building (i.e. the maximum amount of wastes and recyclables it can handle at one time)? What happens when the peak amount is reached? A peak amount is needed for the SWFP. 7-12
3. The LEA prefers that the entire WRC operation be enclosed at the beginning of operation. This includes all materials/wastes being unloaded inside the building and having doors that close. This would control litter, odors and vectors and ensure full control of the operation. Phase-in building constructions are difficult to do when a facility is operating 24-hours per day. The construction may be more costly and the operator may decide not to implement the final constructions, therefore not meeting all the LEA requirements. 7-13
4. The LEA prefers that all equipment be installed before waste is accepted at the facility. Installing new equipment after opening can cause safety as well as operational problems. 7-14

5. If for some reason the operator will need to use the Waste Shuttle Facility until the WRC construction is completed, extra precautions may be necessary. Past experience has shown that the sorting line can be dangerous to use in high wind conditions. All safety precautions should be taken when utilizing this facility. 7-15
6. What type of lighting will be provided for after-dark activities? 7-16
7. For the WRC alternative location in AREA A, what is the traffic route from the landfill entrance to this building? Figures 13-2 and 13-3 do not indicate this traffic route. 7-17
8. Figure 13-2 indicates that trees will be planted along the class II site slurry wall. Will these trees be planted far enough away so as root growth will not compromise the slurry wall? What kind of monitoring of the root structure will be done to ensure no damage to the slurry wall? 7-18
9. What kind of restrictions will there be regarding self-haulers exiting their vehicles to unload? Will there be adequate separation from commercial vehicles? Animals and children should not be allowed out of vehicles. 7-19
10. There has been discussion that the soil building will be removed so more waste can be buried in that location.
 - a. What studies and building designs have been developed for placing a new building in this area for use as the WRC? This would also affect the drainage and runoff controls. 7-20
 - b. If this should occur, will the alternative location in AREA A be used for the WRC? 7-21
11. What is the storage time limit for all recyclables recovered in the Mixed Waste Processing Area? These materials should be removed before they become vector and odor problems. 7-22

WET/DUSTY MATERIAL BLENDING

1. Page 2 of Appendix 3E lists examples of the types of high-moisture content materials to be processed. Make note that these should all be non-hazardous. What protocol will be used to ensure these materials are non-hazardous? 7-23
2. How will this facility operate during the wet weather season? Will it be able to serve its purpose during this time? 7-24
3. The description states "about 51,000 tons per year of material would be processed." What is the maximum amount of material the operation can handle at any one time? How long will the material be on site? The LEA will need this information for the SWFP. 7-25

4. What is the peak amount of wet/dusty material on site at any one time? What happens if it reaches peak capacity? 7-26

5. The LEA requests a clarification as to when this operation will occur. Is it only while the landfill is still open or will it continue once the landfill is closed? If it continues when the landfill closes, where will the mixed material go? 7-27

6. What type of lighting will be provided for after-dark activities? 7-28

WOOD RECOVERY

1. What type of lighting will be provided for after-dark activities? 7-29

SOIL RECLAMATION

1. How will this facility operate during the wet weather season? Will it be able to serve its purpose during this time? 7-30

2. What is the peak amount of material on site at any one time? What happens if it reaches peak capacity? 7-31

3. What type of lighting will be provided for after-dark activities? 7-32

BIOSOLIDS/DREDGED MATERIAL SPREADING

1. The Regional Water Quality Control Board (RWQCB) oversees the regulation of biosolids and should be included in any approval and demonstration activities. The RWQCB will also need to determine conditions for applying the biosolids and dredged materials to the slopes. 7-33

2. What affect will these operations on the slopes have on the Public Access Trail? Will this material slide down the slope if too wet? 7-34

3. In the description, it indicates that some of the dried biosolids will be scraped off to be used off site, some will be used to add a buffer to the final landfill cap if the cap is scraped down while removing the dried biosolids, and some will be spread on the slopes once a year for erosion control as is currently done to help the growth of plant life. These are acceptable to the LEA. However, the fourth option indicated is to let it remain on the slope when dried (i.e. no removal). This constitutes disposal and will not be allowed by the LEA or CIWMB as the landfill will be closed and unable to accept any more waste for disposal. The RWQCB has stated that no more disposal will be allowed after January 31, 2006. 7-35

Disposal of dredged materials into the landfill is okay while the landfill is still open. But once the landfill is closed, disposal is no longer approved. Dredged materials and biosolids must be removed when dried and either used for landfill cover repairs or sent somewhere else. 7-36

4. IMPACT 11-7 indicates that the biosolids used will be Class B and are not pathogen free. The mitigation measures indicate that the biosolids produced at the WCWD are Class A. Does this mean that WCCSL will only take Class A biosolids? Restrictions to applying the biosolids should consider the protection of employees and the public. 7-37

5. What is the peak amount of biosolids and dredged materials on site at any one time? What happens if it reaches peak capacity? 7-38

6. What type of lighting will be provided for after-dark activities? 7-39

LANDFILL

1. Page 3-5 of the EIR indicates that the treated auto shredder waste is currently shredded on-site. The LEA understands that this material arrives at WCCSL already shredded. Shredding this material on-site is not an approved operation in WCCSL's current SWFP. 7-40

2. Page 5-9 of the EIR indicates that the base of the refuse is currently between about elevation 0 and -20 feet msl. During the last SWFP revision, it was indicated that the elevation was -30 feet msl. 7-41

PUBLIC ACCESS TRAIL

1. The LEA agrees that no animals/dogs be allowed on the Public Access Trail. 7-42

2. The operator should provide frequent inspections along the portions of the access trail immediately adjacent to the landfill and on the landfill to ensure no damage to the landfill final cap and the fencing preventing trail users from entering active solid waste operations areas. 7-43

GENERAL/OVERALL COMMENTS

1. Gas monitoring should be conducted inside *all* structures to be located on the landfill for each proposed operation. This includes *audible* landfill gas/methane detection alarms in buildings that will be occupied by staff. The alarms should be checked frequently to ensure operational status. 7-44

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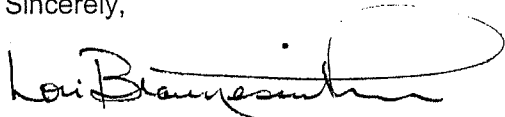
2. The following updates the information provided on page 10-9 of the EIR regarding the composting regulations:

- a. The composting regulations became effective in April 2003.
- b. The LEA received WCCSL's Odor Impact Minimization Plan (OIMP) on April 16, 2003.

7-45

Thank you for the opportunity to review and comment on the draft EIR. Should you have any questions, please contact me at (925) 646-5225 ext. 232.

Sincerely,



Lori Braunesreither, REHS
Senior Environmental Health Specialist

cc: Diana Post, California Integrated Waste Management Board
Beatrice Poroli, California Integrated Waste Management Board
Larry Burch, West Contra Costa Sanitary Landfill