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CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD



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Subject: State Clearinghouse (SCH) No. 1989040415 – Notice of Preparation of a Draft Supplemental Environmental Impact Report (SEIR) for the Keller Canyon Landfill (KCLF) for landfill expansion and future operations requiring the issuance of revised Solid Waste Facility Permit (SWFP) No. 07-AA-0032, Contra Costa County

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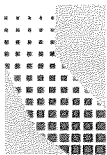
Dear Ms Dingman:

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The staff of the California Integrated Waste Management Board (CIWMB or Board), has reviewed the NOP for the project cited above. The following is a brief description of the proposed project for staff's use in the solid waste facility permitting process, a brief description of the Board's role as a responsible agency, followed by recommendations on information and analysis to consider in the EIR and that will aid decision-makers at the CIWMB to determine whether the EIR is adequate for the Board's needs when considering concurrence in the issuance of the KCLF revised SWFP.

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Board staff's comments on the NOP are intended to address potentially significant environmental impacts and information that is germane to the CIWMB's regulatory authority over current and future operations at the KCLF. If the CIWMB's project description varies substantially from the project, as understood by the lead agency, Board staff requests that the discrepancies, if any, be clarified in the SEIR.



INTEGRATED
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Existing Solid Waste Facilities Permit (SWFP)

According to the current SWFP (07-AA-0032), issued on March 27, 2000, the facility is currently permitted under the following parameters:

- Owner: Keller Canyon Landfill Company AKA Allied Waste Industries, Inc.
- Operator: Keller Canyon Landfill Company
- Maximum daily tonnage permitted for receipt: 3500 maximum tons per day (tpd) solid waste
- Hours and days of operation: 6 Days a week. 7:00 am to 7:30 pm Monday through Saturday. No waste shall be accepted after 7:00 pm. The required daily cover shall be completed by 7:30 pm, at which time all stationary working lights shall be extinguished.
- Number of incoming waste vehicles permitted per day: 260 vehicles per day
- Maximum height of landfill: 1050 ft mean sea level (msl)
- Total permitted landfill area: 1399 acres
- Permitted disposal footprint area: 244 acres
- Estimated closure date: 2030
- Remaining waste capacity: Total - 75 million cubic yards, Disposal – 60-64 MCY

PROJECT DESCRIPTION

The Keller Canyon Landfill is located at 901 Bailey Road, in unincorporated Contra Costa County near Pittsburg, CA. This proposed project consists of operational changes which the Keller Canyon Landfill Company (KCLC) has requested in their application to amend the facility's existing Land Use Permit (LUP) Conditions of Approval.

In 1990, the County Board of Supervisors certified the project Environmental Impact Report (EIR). Keller Canyon Landfill has been in continuous operation since May 1992. KCLC is requesting that the County modify LUP conditions governing facility operations, but does not propose any changes to the landfill site/boundaries, buildings, or floor plans.

KCLF proposes a SWFP revision to increase the current maximum daily tonnage limit for disposal from 3,500 to 4,900 tons per day (TPD), and to identify a separate maximum daily tonnage limit on organic material accepted for use as alternative daily cover (ADC) and as inert material accepted for beneficial re-use onsite. KCLF proposes that approximately 1,300 TPD of non-landfilled materials be specifically excluded from the daily disposal tonnage limitation.

The following daily tonnage limits for non-landfilled materials are being proposed as part of this application:

- Green Waste — 500 TPD,
- Wood Waste 300 TPD and,
- Inert • Material — 500 TPD (includes concrete, asphalt base material).

Other than the above-described proposed changes no other substantive alterations are proposed to the landfill facility design or operations. This includes no changes to facility components such as the waste types to be accepted (Class II), hours of operation, number of vehicles per day, permitted waste disposal boundary, disposal area and maximum fill elevation. The County has determined that the proposed operational changes associated with the proposed Land Use Permit amendment, and a revised Solid Waste Facility Permit, will require a Supplemental ER (SEIR) pursuant to the California Environmental Quality Act (CEQA) Guidelines.

CIWMB Staff Comments

The following are typical considerations that Board staff recommends for inclusion in the draft SEIR in order to help evaluate the scope and content of the SEIR for proposed changes in at the KCLF, and issuance of a revised SWFP:

Outdated Environmental Documents

As the previous EIR for the facility was prepared more than 17 years ago, it is recommended that the draft SEIR contain a full, up to date analysis of all possible significant impacts for the project as a whole, including the proposed changes. The draft SEIR should contain a recent and up to date initial study, along with current studies for traffic, air, water, noise and lighting and other impacts on sensitive receptors in the area as a result of operations as a whole at the KCLF.

CIWMB CEQA/Environmental Document Checklists

Below is an internet link to the Board's website that contains detailed CEQA information germane to landfill design and operations, for those seeking a SWFP from the CIWMB. This list should be used as reference in the preparation of the SEIR to assure that all relevant information that relates to the current and proposed project, is addressed:
<http://www.ciwmb.ca.gov/PermitToolbox/CEQA/default.htm>

Cumulative Impacts

It is important that the draft SEIR identify potentially significant cumulative impacts, both locally and regionally, resulting from the proposed project and any combined projects within the project vicinity, as well as those incremental impacts resulting from the proposed project's implementation.

Land Use Compatibility

The draft SEIR should identify the proposed KCLF surrounding land use with a description of the density of the occupancy for commercial and residential areas. The draft SEIR should be specific regarding the distance to the nearest sensitive receptor(s). The project's surrounding land use must be designated as compatible with the proposed/current land uses at the project sites. The local government, in whose jurisdiction the facilities will be located, must make a finding that the facility is consistent with the General Plan (Public Resources Code Section 50000) and is identified in the most recent County Integrated/Solid Waste Management Plan (Public Resources Code Section 50001).

Surface Drainage

The draft SEIR should include a drainage plan which identifies the paved and exposed surfaces where the projects' proposed operations may take place. The plan should identify surface water runoff, including, but not limited to creeks, rivers, and/or diversion channels in areas adjacent to the project area. Indicate on a map drawn to scale the location of all project proposals to be carried out over buried landfill refuse. Identify on this map any diversion berm(s) that will redirect flow away from/around the facility proposals and any drainage basins to keep drainage on-site or adjacent to the site. Will the KCLF's design be able to handle a 100-year, 24-hour storm event? Board staff recommends that the Regional Water Quality Control Board (RWQCB) be contacted to determine if a Report of Waste Discharge (ROWD) or a National Pollution Discharge Elimination System (NPDES) permit is required for the proposed facility.

Traffic and Related Transportation System Impacts

The NOP does not state whether there will be an increase in vehicles per day to the site as a result of the proposed project. Board staff will assume then that maximum traffic volumes are not proposed to increase in the SEIR. If an increase in traffic to the site is proposed, a traffic study may be necessary to determine whether the existing infrastructure can handle the projected vehicular movement, and whether improvements may be necessary to accommodate increased traffic; including the repair of, and maintenance of, existing roads, additional lighting, turn lanes, and pedestrian walkways; as well as cumulative impacts on the circulation within the landfill vicinity. The regional district of CalTrans should be contacted regarding potential issues related to an increase in traffic volumes around the KCLF if increases are proposed. Total traffic counts should be projected over a minimum of five years for the project at peak throughput considering both short haul and possible long haul aspects of the project proposal. If an increase will occur, discuss the cumulative effect of traffic for all of the projects proposed for analysis in the draft SEIR.

Air Quality/Global Warming

Local and regional impacts on air quality from vehicles, trucks, and equipment emission sources accessing the facility should be analyzed in detail, including emissions from equipment handling waste materials and potential dust generation during operations at the KCLF. Dust particulates (PM₁₀) and ozone precursors may be of particular concern if the regional air basin is 'non-attainment' for PM₁₀ and ozone precursors. If the proposed projects are located within a 'non-attainment' air basin, cumulative impacts affecting the projected federal 'attainment' dates may be significant and unavoidable.

The draft SEIR should address what odors may emanate from the KCLF facility and from which operations/areas. The SEIR should identify the distance to the nearest residential and/or commercial receptor(s) and reflect this information on a map. Mitigation measures, which will be employed to address impacts for the proposed facility, should be incorporated with a description of the 'attainment' plan for the air basin(s) air quality. There should be a brief description and reference to the Odor Impact Minimization Plan (OIMP) in the draft SEIR, if the facility accepts green waste

and/or food waste. The local Air Pollution Control District should be contacted regarding air pollution discharge permits, which may be required to ensure compliance with ambient air quality standards.

Noise

A current noise study may be necessary if local receptors are impacted from the project as proposed, and should be included in the draft SEIR. Additionally, appropriate noise-attenuating mitigation measures, which can be implemented to reduce noise levels, should be incorporated into the draft SEIR. Short term and cumulative impacts should be assessed as well as operations related noise.

Wood Waste, Construction and Demolition and Inert Debris

Storing and processing of construction and demolition wastes may be subject to the Construction and Demolition and Inert Debris Transfer/Processing regulations in 14 CCR §§ 17380 - 17386. Please see the following Internet link to the regulations: <http://www.ciwmb.ca.gov/Regulations/Title14/ch3a59a.htm>.

Acceptance, Processing and/or Storage of Organic Materials

Board staff requests that mitigation in the draft SEIR include that all wood waste, green waste, and food waste accepted at the KCLF should not have moisture content greater than 50 percent, and that these organic wastes be handled/processed in a manner so as to not exceed 122 degrees Fahrenheit (° F). Organic waste exceeding 122° F is considered a composting facility under Title 14, CCR, Chapter 3.1 "Composting Operations Regulatory Requirements".

Title 14, CCR, Section 17407.5 - Hazardous, Liquid, and Special Wastes

- (a) An operation or facility shall not intentionally accept or store hazardous wastes, including batteries, oil, paint, and special wastes, unless it has been approved to handle the particular waste by the appropriate regulatory agencies. Such approvals shall be placed in the operating record.
- (b) At operations and facilities where unauthorized hazardous wastes are discovered, control measures as are necessary to protect public health, safety and the environment, such as elimination or control of dusts, fumes, mists, vapors or gases shall be taken prior to isolation or removal from the operation or facility,
- (c) Liquid wastes and sludges shall not be accepted or stored at an operation or facility unless the operator has written approval to accept such wastes from the appropriate agencies and the EA. The LEA shall authorize acceptance of these wastes only if the operation, facility, and the transfer vehicles are properly equipped to handle such wastes in a manner to protect public health, safety, and the environment.

Mitigation Reporting or Monitoring Program (MRMP)

As required by Public Resource Code (PRC) Section 21081.6, the lead agency should submit a MRMP at the time of local certification of the SEIR. This program should identify the environmental impacts associated with the proposed project, identify

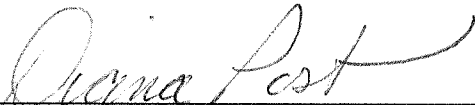
mitigation measures to reduce impacts to a less than significant level, identify agencies responsible for ensuring the implementation of the proposed mitigations are successful, and specify a monitoring/tracking mechanism. PRC Section 21080(c)(2) requires that mitigation measures "...avoid the effects or mitigate the effects to the point where clearly no significant effects on the environment would occur." The MRMP is required to be completed as a condition of project approval. PRC Section 21081.6(b) requires that "A public agency shall provide the measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." The MRMP should also clearly indicate the agencies or private entities designated to enforce each mitigation measures in the EIR and that they have reviewed the MRMP and agreed that they have the authority and means to accomplish the designated enforcement responsibilities.

CONCLUSION

The proposed draft SEIR should be circulated through the State Clearinghouse as required in Section 15205(a) of the CEQA Guidelines. Board staff requests that the CIWMB be noticed of the date, time and location of any public hearings regarding the project proposal at least ten days in advance.

Thank you for the opportunity to comment on this project in the early planning stages. Board staff are available for any planned scoping meetings, workshops or other public meetings upon your written request at least ten days in advance. If you have any questions regarding these comments, please contact me at (916) 341-6727, facsimile: (916) 319-7151, or via e-mail: dpost@ciwmb.ca.gov

Sincerely,



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