

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

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P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

March 7, 2013

Ms. Stacy L. Lawson
City of Lompoc
Department of Public Works
Solid Waste Management Division
222 West Hospitality Lane, 2nd Floor
San Bernardino, CA 92415

Subject: SCH No. 2013021012 – Notice of Completion - Proposed Mitigated Negative Declaration for Landfill Gas Collection and Control System at the Lompoc Regional Landfill/City of Lompoc Sanitary Landfill in Santa Barbara County (Solid Waste Facility Permit No. 42-AA-0017)

Dear Ms. Lawson:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this 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 Lompoc, acting as Lead Agency, prepared a Mitigated Negative Declaration (MND) for Landfill Gas Collection and Control System. The proposed project consists of the installation of a landfill gas collection and control system at the Lompoc Regional Landfill (aka: City of Lompoc Sanitary Landfill as stated on the Solid Waste Facilities Permit [Landfill]). The proposed project will consist of an enclosed gas flare to burn methane generated at the Landfill (80-400 standard cubic feet per minute at 50-percent methane) and a gas well and collection system. The gas flare will measure six (6) feet in diameter by twenty four (24) feet tall. A propane source will be used for a pilot flame to ignite the Landfill Gas (LFG) that is introduced to the flare. The gas extraction and flare system will be operated continuously to minimize LFG leaks, except during unanticipated shutdowns or for maintenance and repair activities. The purpose of the proposed project is to control methane emissions, a greenhouse gas at the Landfill. The construction is scheduled within eighteen (18) months of proposed project approval by the California Air Resources Board.

The Initial Study Environmental Checklist indicated environmental issues which had impacts classified as Less than Significant With Mitigation Incorporated: Aesthetics, Air Quality, Biological Resources, Hydrology/Water Quality, and Hazards & Hazardous Materials. Through



mitigation measures the impacts would be reduced to less than significant levels. All other environmental issues reviewed either had no impact or a less than significant impact.

Comments

The Santa Barbara County Public Health Department - Environmental Health Services (as the Local Enforcement Agency (LEA) for Santa Barbara County) and CalRecycle are responsible for providing regulatory oversight of solid waste handling including permitting and inspections at landfills such as the City of Lompoc Sanitary Landfill to ensure compliance with applicable requirements contained in Title 27, California Code of Regulations (27 CCR). The LEA staff contact is Michael Schmaeling and he can be reached at 805.346.8466 or by e-mail at mike.schmaeling@sbcdph.org regarding landfill gas collection and control requirements and solid waste facility permit requirements for the proposed project.

CalRecycle's requirements for the design and operation of a landfill gas collection and control system are found in 27 CCR, Division 2, Chapter 3, Subchapter 4, Article 6 – Gas Monitoring and Control at Active and Closed Disposal Sites.

As required by Public Resources Code, Section 21081.6, the Lead Agency should submit a Mitigation Reporting or Monitoring Program at the time of local certification of the Mitigated Negative Declaration. This plan 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, and specify a monitoring/tracking mechanism.

Conclusion

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

CalRecycle staff requests copies of any subsequent environmental documents, the Mitigation Monitoring and Reporting Program, public notices and any Notices of Determination for this project. Refer to 14 CCR, Section 15075(d) that states:

If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse].

Any subsequent or revised environmental documents should be circulated through the State Clearinghouse as required by 14 CCR, Section 15205.

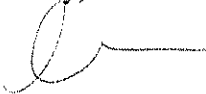
If the environmental document is adopted during a public hearing, CalRecycle requests ten days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle

Ms. Lawson
City of Lompoc
March 7, 2013
Page 3 of 3

staff requests ten days advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 951.782.4168 or by e-mail at Dianne.Ohiosumua@calrecycle.ca.gov.

Sincerely,



Dianne Ohiosumua
Permitting and Assistance Branch – South Section
Waste Permitting, Compliance, and Mitigation Division

cc: Virginia Rosales, Supervisor
Permitting and Assistance Branch - South Section

David Brummond, Supervisor
County of Santa Barbara-Environmental Health Services - LEA

Lawson, Stacy

From: Schmaeling, Mike [Mike.Schmaeling@sbcphd.org]
Sent: Friday, February 15, 2013 3:32 PM
To: Lawson, Stacy
Cc: 'Ohiosumua, Dianne'
Subject: ER 13-0001 Mitigated Negative Declaration for the Gas Collection System at the Lompoc Regional Landfill

Hello Stacy,

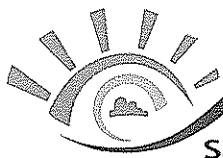
Environmental Health Services as the Local Enforcement Agency for solid waste regulation, offers the following comments on the subject of this e-mail.

1. Page 1, Gas Extraction System – It is stated that the western branch (header pipe) will be buried under the storm drain conveyance ditch. This may not be a good idea, as the pipe could be damaged during heavy rainfall or drainage course maintenance. Repair would be very difficult to accomplish during wet weather events since water in this main drainage course would have to be diverted to access the pipeline. Also, if this pipe was to leak, it could easily contaminate the storm water.
2. Page 2, Construction – It is stated that “long duration foam, plastic sheeting and/or clean dirt shall be used to cover refuse /contaminated soils during non-working hours or when excessive LFG is detected”. The LEA approved work plan for this project should address how all waste (and contaminated soils) will be handled/disposed of. The plan should describe how all excavated areas will be protected during nonoperational hours. There is a serious concern with the generation of odors and how to minimize exposing the public to these odors. Therefore, the Work Plan should also describe its odor management strategy. Methane gas also has an explosive and flammable hazard, so the Health and Safety Plan for the construction of the Landfill Gas Collection System needs to provide a detailed description of how these hazards will be addressed.
3. Page 14, Hazards and Hazardous Materials, Comments:, h) – The proposed flare location is close to trees, brush and wildland grasses. This raises some concerns regarding fire hazards. What potential impacts could the flare have in accidentally causing a fire and what hazards are there if a brush was to spread down the slope to the flare area?

Thank you for including me in the distribution of this draft document. Please keep me in the loop on the progress of this document.

Sincerely,

Mike Schmaeling
Environmental Health Services, Santa Barbara County

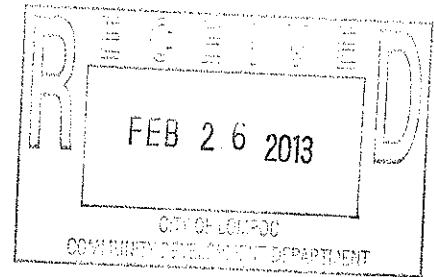


**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

February 25, 2013

Stacy Lawson
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436



Re: APCD Comments on Draft Mitigated Negative Declaration for Lompoc Regional Landfill Gas Collection and Control System

Dear Ms. Lawson:

The Air Pollution Control District (APCD) has reviewed the Draft Mitigated Negative Declaration (MND) for the project, which consists of an enclosed gas flare to burn methane generated by the landfill, and a gas well and collection system that will be operated continuously. A propane gas source will be used to maintain the pilot flame. An undetermined amount of grading will occur during construction. The subject property, a 116-acre parcel zoned Public Facilities and identified in the Assessor Parcel Map Book as APN 093-111-024, is located at 700 South Avalon Street in the City of Lompoc.

The landfill is under active APCD permit and the proposed landfill gas collection and control system is subject to APCD permit requirements and prohibitory rules. Therefore, APCD is a responsible agency under the California Environmental Quality Act (CEQA). The operator must obtain an APCD permit prior to installation of the landfill gas collection system.

Air Pollution Control District staff offers the following comments on the Draft MND:

1. **Initial Study, Air Quality Section, Pg. 9:** The installation of the landfill gas collection and control system will include a new flare to combust landfill gas, that will be a new source of criteria pollutant emissions. Please revise the text to quantify emissions from the proposed flare and compare to appropriate thresholds.
2. **Initial Study, Greenhouse Gas Section, Pg. 9:** The text should clarify that the installation of the landfill gas collection and control system will capture methane emissions and, through combustion, convert methane into carbon dioxide and other products of combustion. The project results in a net reduction of greenhouse gas emissions, consistent with the goals of AB32.

Air Pollution Control District staff suggests that the following measures be applied to the project:

1. Standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the APCD prior to issuance of land use clearance.
2. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities* establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks

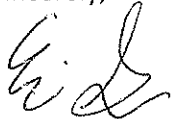
Louis D. Van Mullen, Jr. - Air Pollution Control Officer

moving on- and off-site. The text of the rule can be viewed on the APCD website at www.sbcapcd.org/rules/download/rule345.pdf.

3. Fine particulate emissions from diesel equipment exhaust are classified as carcinogenic by the State of California. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of ozone precursors and fine particulate emissions from diesel exhaust.
4. All portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.
5. If contaminated soils are found at the project site, the APCD must be contacted to determine if Authority to Construct and/or Permit to Operate permits will be required.
6. At all times, idling of heavy-duty diesel trucks must be limited to five minutes; auxiliary power units should be used whenever possible. State law requires that drivers of diesel-fueled commercial vehicles:
 - shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location
 - shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8893 or via email at edg@sbcapcd.org.

Sincerely,



Eric Gage,
Air Quality Specialist
Technology and Environmental Assessment Division

Attachments: Fugitive Dust Control Measures
Diesel Particulate and NO_x Emission Measures

cc: Michael Goldman (pdf)
Project File
TEA Chron File



ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

Plan Requirements: All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing:** Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

MONITORING: Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.



ATTACHMENT B
DIESEL PARTICULATE AND NO_x EMISSION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is an updated list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

The following measures are recommended:

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

Plan Requirements: Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

MONITORING: Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.