

Author	Letter No.	Comment No.	Comment Text	Resource/Section	Comment Response
Managed Organic Recycling	2A	1	The DEIR covers the normal impacts associated with construction and facility operation, but it is weak on the actual details of an operating composting facility. It provides general discussion of process types, i.e. windrow composting, aerated static piles, negative and forced aeration, covered vs uncovered piles; however, the reader, especially those not knowledgeable of how a composting facility operates, is left to guess what goes on inside pads shown on PAGE 5. This is especially critical for composting areas 1 and 2 and the aerated curing area. Absent detail, it is difficult to comment on issues, such as fire protection, materials handling, and traffic flow on the sealed surfaces at the site.	Project Description	<i>"The project is adequately described in the "Project Description" section of the DEIR. The project site is clearly delineated on pages 2-15 and 2-16 of the study, with a three-dimensional rendering of the site plan included in Figure 2.2-6. Meanwhile, areas on the site plan included on page 2-6 includes labels depicting where portions of the composting process will occur, including the receiving, grinding, and storage area; the mixing and receiver area, the biofilter area; the primary compost areas; the compost storage area; and the aerated curing area. Each of the activities occurring in those area are explained, in detail. For instance, the receiving and processing area and the mixing and receiving building are described on pages 2-13 and 2-14 of the DEIR; active composting is described on page 2-14 (and as the DEIR indicates, the Proposed Project would utilize an aerated static pile system technology); and curing activities are described on page 2-14. Explanatory background information of what each of these processes entail is further provided both in the DEIR (e.g., pp. 2-4 and 2-5) and Appendix B of the DEIR to help lay persons understand the composting process. Further, project information such as compost feedstock types, throughput, hours of operations, employee counts, equipment inventories, and other key details are thoroughly described in the project description. The level of detail included in the document is sufficient to evaluate environmental resources and analyze the potential for impacts as required by CEQA. The document also provides discussion of fire protection, materials handling and traffic flow on site, which will not significantly change based on the type of aerated static pile technology that is selected during design. Further, as noted in the DEIR, the Proposed Project would be operated in compliance with all relevant regulations for fire prevention.</i>
Managed Organic Recycling	2A	2	Has any consideration been given to using solar power to aerate the piles? Positive aeration will be more efficient than a negative aeration system (generally uses 2/3rds less power).	Design	<i>The project proponent is evaluating solar powered blowers. Although the document addresses both positive and negative aeration, it is likely that the facility will utilize a positive aeration system. For instance, please see pages 2-14 and 3.12-9 of the DEIR. Please also refer to section 3.7.2 of the DEIR for information about energy sources, including solar energy, for electricity that would be used to power the project through PG&E utilities.</i>
Managed Organic Recycling	2A	3	Are the piles aerated with a common blower (manifold aeration)? This type of aeration is substantially more costly due to elaborate controls and piping. Also, if a mechanical failure occurs, it impacts a greater portion of the process.	Design	<i>Please refer to the Project Description for information regarding aeration processes. The Project will utilize 22 aeration blowers (see Table 2.2-3)."</i>
Managed Organic Recycling	2A	4	Has consideration been given to solar powering the blowers? Solar panels would provide substantial sqft of surface area to collect stormwater for storage which could be used for moisture control (Altamont Pass is dry and windy during the summer).	Design	<i>Please refer to section 3.7.2 of the DEIR for information about energy sources, including solar energy. At this time the project proponent is not considering solar powering blowers.</i>

Managed Organic Recycling	2A	5	What particulate control measures are incorporated in the design (bulking agent grinding and storage area)?	Design	<i>Particulate control measures would be employed during grinding operations. Water would be added during the grinding process to reduce dust and air-borne particles, and once material is placed into piles for composting, it would be covered to prevent windblown particles from leaving the site, as discussed on page 2-4 of the DEIR. Please also refer to Mitigation Measures AQ-1, AQ-2, and AQ-3 for information about plans to mitigate particulate emissions.</i>
Managed Organic Recycling	2A	6	What is the emission control standard for volatile organic compounds (VOC) for the project?	Air Quality	<i>The project will be required by the Bay Area Air Quality Management District (BAAQMD) to meet Best Available Control Technology (BACT). Per BAAQMD guidelines, composting technologies proposed at the site will exceed 80% reduction of VOCs. Further, Volatile Organic Compounds (VOCs) are similar to Reactive Organic Gases (ROG). Therefore, the ROG thresholds listed in Table 3.4-2 of the Draft EIR were used to determine the significance of the project's VOC emissions.</i>
Managed Organic Recycling	2A	7	Does San Joaquin Valley Air Pollution Control District's Rules have any impact on VOC emissions, i.e., 90% reduction of VOCs?	Air Quality	<i>The project is not in the San Joaquin Valley Air District, so the project would not be held accountable to SJVAD rules and regulations. The BAAQMD does not give VOC reduction technologies more than 80% reduction when calculating impacts.</i>
Managed Organic Recycling	2B	1	<p>I was hoping to get more information on the key features of the system, such as Pad 1 (Active Composting Area, number of piles/bunkers), Pad 2 (Active Composting Area, number of piles/bunkers), Curing Area (volume), Pad 3 (Final Product Curing Area, residence times). What is the volume of the receiving bldg. (how is the biofilter sized/residence time)? Was a materials flow schematic prepared for the design?</p> <p>Even some preliminary detail would be helpful as it would show how the plant expansion from 250t/yr to 1,000t/yr could be accomplished.</p>	Project Need	<p><i>The DEIR provides sufficient information and a preliminary plan for the project to address potential environmental impacts.</i></p> <p><i>The project is adequately described in the "Project Description" section of the DEIR. The project site is clearly delineated on pages 2-15 and 2-16 of the study, with a three-dimensional rendering of the site plan included in Figure 2.2-6. Meanwhile, areas on the site plan included on page 2-6 includes labels depicting where portions of the composting process will occur, including the receiving, grinding, and storage area; the mixing and receiver area, the biofilter area; the primary compost areas; the compost storage area; and the aerated curing area. Each of the activities occurring in those area is explained, in detail. For instance, the receiving and processing area and the mixing and receiving building are described on pages 2-13 and 2-14 of the DEIR; active composting is describe on page 2-14 (and as the DEIR indicates, the Proposed Project would utilize an aerated static pile system technology); and curing activities are described on page 2-14. Explanatory background information of what each of these processes entail is further provided both in the DEIR (e.g., pp. 2-4 and 2-5) and Appendix B of the DEIR to assist lay persons comprehending the composting process. Further, project information such as compost feedstock types, throughput, hours of operations, employee counts, equipment inventories, and other key details are thoroughly described in the project description.</i></p>

					<p><i>Regarding the comment regarding Pad 1 (active composting area, number of piles/bunkers), the number of piles/bunkers will be determined based on the pile/bunker size. Larger piles will result in less piles/bunkers and smaller piles will result in more piles. The same applies the comment regarding Pad 2. Regarding the Curing Area residence time and receiving building biofilter please see Section 2.2.5 Operation of the Proposed Project. The DEIR contains a preliminary plan for a 1,000 tpd facility, showing the receiving area, receiving building, primary composting areas, curing area, and finished product storage. Please see Figure 2-2.4 that shows the preliminary site plan and the area that is anticipated for each project component. The operation of a composting facility must be flexible; composting is a dynamic enterprise and pad sizes depend on the volume of delivered materials and market demand. The additional details sought by the commenter presume a static operation and, moreover, are unnecessary to understand the environmental impacts of the Project.</i></p> <p><i>An EIR's project description need only contain a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals, if any, and supporting public service facilities. (CEQA Guidelines, § 15124, subd. (c)). The project description must contain sufficient specific information about the project to allow an evaluation and review of its environmental impacts. An EIR is not required to contain a design-level description of the project; a conceptual description of project components is sufficient as long as the description contains sufficient detail to enable decision-makers and the public to understand the impacts of the proposed project. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20.)</i></p>
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