

City of San Leandro

Civic Center, 835 E. 14th Street
San Leandro, California 94577
www.sanleandro.org



April 4, 2016

Mr. Shawn Tackitt
Waste Management of Alameda County
172 98th Avenue
Oakland, California 94603

Subject: PLN2010-00026; Proposed Food Waste/Organics/Green Waste Processing Facility
Davis Street Transfer Station, San Leandro, California

This is a follow up to our February 19, 2016 meeting in City offices where you and your team provided an update on the status of the proposed organic waste processing and composting facilities planned for the Davis Street Transfer Station site.

It is understood that Waste Management proposes to construct a Food Waste/Organics Recycling Facility and a Food Waste/organics/Green Waste Composting Facility. The facilities would be in separate, enclosed buildings. We reviewed and discussed proposed operating parameters, organic material throughputs (traffic, material tonnages), process methods, environmental controls and preliminary building envelope/height design elements. Preliminary architectural renderings were also presented. These plans were compared with those described in the Updated Master Plan for facility improvements, and the CEQA Initial Study/Mitigated Negative Declaration (IS/MND), both approved in January 2011 under permit PLN2010-00026.

On March 2, 2016, Waste Management submitted revised architectural renderings reflecting changes in building color schemes requested by the City. Based on the City's review of the currently-proposed plans we find that the project is consistent with previously-approved Master Plan and CEQA IS/MND, PLN2010-00026.

Please note that the City reserves the right to provide additional comments or specify requirements as part of the plan check submittals for building permits, to ensure consistency with CEQA and local codes/ordinances.

Sincerely,

Sally Barros, Zoning Enforcement Official

Copy: Laura Pate, Waste Management of Alameda County
Richard Spediacci, Waste Management of Alameda County
Arthur Surdilla, Alameda County Environmental Health Department

Pauline Russo Cutter, Mayor

City Council:

Deborah Cox
Jim Prola

Benny Lee
Ursula Reed

Corina N. López
Lee Thomas



SCS ENGINEERS

File No. 01215074.00
October 23, 2015

MEMORANDUM

TO: Arthur Surdilla, Alameda County Environmental Health (LEA)

FROM: Joseph Miller, SCS Engineers

COPY: Jeff Hackett, CalRecycle
Shawn Tackitt, Waste Management
Tianna Nourof, Waste Management

SUBJECT: **LEA/CalRecycle Preliminary Review of Integrated Waste Processing Facility and Organic Waste Composting Facility Alternatives, Davis Street Transfer Station, Alameda County, CA (Updated Per Teleconference Call October 23, 2015)**

This memo, prepared by SCS Engineers (SCS) on behalf of Waste Management of Alameda County Inc. (WMAC), summarizes our understanding of your agency's preliminary review of municipal solid waste compost improvement alternatives currently being considered for the Davis Street Transfer Station (DSTS). This memo includes agency suggestions on required permit steps, as discussed via teleconference on the above date. We now seek your written concurrence with the agency feedback and findings summarized herein.

BACKGROUND

In 2011, an updated Master Plan for facility improvements at the Davis Street Transfer Station was approved after adoption of a CEQA Initial Study/Mitigated Negative Declaration (IS/MND). The Master Plan described provisions for among other things, a proposed Food Waste/Organics Recycling Facility (now known as the Integrated Waste Processing Facility), and a Food Waste/Organics/Green Waste Composting Facility (Composting Facility). Both facilities would be in separate, enclosed buildings. WMAC is now in the final planning stages of the project and expects to have the Integrated Waste Processing Facility and Composting Facility designed, permitted and operational in years 2018 and 2019, respectively.

Since the Master Plan was approved, there have been advances in technologies and approaches to improve composting operations. In this light, WMAC is currently considering four alternatives for the Composting Facility. In August, 2015, WMAC and SCS met with CalRecycle and Alameda County Environmental Health (Local Enforcement Agency, or LEA) on two occasions to present these alternatives, and compare the Integrated Waste Processing

Facility and Composting Facility operations with the Master Plan. A matrix summarizing those alternatives was provided and is attached for reference.

Subsequent to those meetings, LEA and Cal Recycle staff reviewed the Master Plan and CEQA IS/ND documents and information on the proposed Composting Facility alternatives, with the objective of providing comment on permit strategies or issues to address moving forward.

AGENCY FEEDBACK

SCS and WMAC received LEA feedback in an e-mail dated October 8, 2015. On October 12, 2015, you provided clarification via telephone conversation with SCS. Based on these correspondences, we understand LEA and CalRecycle findings are as follows:

- CEQA issues notwithstanding, no obstacles were identified that would preclude issuing a Solid Waste Facility Permit (SWFP) for any of the four Compost Facility alternatives being considered. As part of a permit application, the LEA and CalRecycle will confirm that the ultimately-proposed Integrated Waste Processing Facility and Composting Facility design and operations are consistent with the Master Plan and Land Use Permit, and that appropriate CEQA analyses have been performed.
- Additional CEQA analyses will not be required for any option that entails anaerobic digestion followed by aerobic digestion in enclosed vessels/tunnels. Per the LEA, only Alternative 3a/b meets these criteria (In-Building, In-Vessel Agitated Compost with Anaerobic Digestion, see attached). At this preliminary stage the LEA would advise that a CEQA amendment for Option 3a/b would not be necessary. It is understood that the final CEQA determination will be made by the City of San Leandro.
- For Alternatives 1, 2 and 4, the LEA would recommend to the City that an addendum to the Master Plan and IS/ND documents is necessary. This addendum process would be similar to that recently undertaken for the Multi-Family Mixed Waste Material Processing Line (see below, for details on proposed next steps).
- Compost Facility processes can only be done within the building as described in the Master Plan.
- Should Waste Management elect to develop the Alternative 3a/b Compost Facility in phases (i.e., anaerobic process as Phase 1, and aerobic process as Phase 2), there are no hard timeline constraints for project phasing that would trigger the agencies to re-visit CEQA. That is, the CEQA analysis would remain valid if one or more years elapse between phases (this of course assumes no significant change in proposed plans or facility operations). In this case, Waste Management can request an extension for project phasing, consistent with request for extension of various DSTS projects dating back to 2011.

PROPOSED NEXT STEPS

Should WMAC elect to proceed with Alternative 3a/b (see attached), WMAC will seek concurrence with the City of San Leandro in regards to the CEQA findings above. WMAC will then prepare permit-level design plans for the Integrated Waste Processing Facility and the Composting Facility. WMAC will then submit the Report of Facility Information (RFI) to the LEA and CalRecycle with supporting documentation to allow for the major modification to the site's SWFP. This package would include an Updated Transfer/Processing Report (TPR) for the DSTS.

Should WMAC proceed with Composting Facility Alternatives 1, 2 or 4, WMAC proposes to prepare and submit, for City of San Leandro staff's independent review and consideration, a CEQA addendum, with relevant supporting technical appendices, to the previously adopted Master Plan and Conditional Use Permit (CU-96-1) for the DSTS Organics Processing Project. A proposed addendum would be to the 1998 IS/MND prepared and adopted for the DSTS Master Plan for 1997-2001 and the 2011 IS/ND for the DSTS Master Plan Improvements. (CEQA Guidelines, §15164). If adopted by the City, the addendum may also be relied upon by the LEA and CalRecycle for issuance of the SWFP, major permit modification application (LEA), and concurrence by CalRecycle.

Section 15164(a) of the CEQA Guidelines provides that an addendum to a negative declaration is the appropriate documentation when the lead or responsible agency has determined that none of the conditions described in CEQA Guidelines §15162 exist. A leadagency may rely on an addendum to a previously adopted negative declaration if minor technical changes or additions are necessary or none of the conditions described in §15162 calling for the preparation of a subsequent negative declaration have occurred. Responsible and Trustee agencies may also rely on a lead agency's addendum for purposes of their respective discretionary approvals.

Based on our understanding of CEQA Guidelines and discussion with CalRecycle, an addendum need not be circulated for public review and comment (CEQA Guidelines, §15164(c)). Rather, the public agency decision makers must independently review and consider the adequacy of the addendum and, if adequate for their respective discretionary decision, adopt the addendum prior to approving the project or issuing a permit for the project. If a public agency decides to adopt an addendum, the public hearing notice(s) for the project must also specifically include notice of the CEQA addendum. If adopted, the Addendum, along with the previously approved MNDs, should be saved in the agency's files.

In summary, for Compost Facility Alternatives 1, 2, and 4, WMAC will prepare permit-level design plans and proceed with the preparation of the CEQA addendum for submittal and approval by the City of San Leandro. WMAC will then submit the application package for the major modification to the site's SWFP to the LEA and CalRecycle. The application package will include the updated TPR and supporting CEQA documentation.

CLOSING

Thank you again for taking time to meet with WMAC representatives, and your insight regarding the permit processes for the proposed Composting Facility.

We discussed the above items via teleconference call with your agency and CalRecycle on October 23, 2015. The text above reflects your correction on the SWFP application process.

WMAC respectfully requests your written concurrence with the preliminary agency findings and proposed next steps outlined above. WMAC is in the final stages of planning and facility design/vendor selection for the Composting Facility. Therefore your timely response is appreciated.

ATTACHMENT

SUMMARY MATRIX:

COMPOST ALTERNATIVES BEING CONSIDERED BY
WASTE MANAGEMENT

Overview of Approaches Under Evaluation

Facility Feature	Master Plan/CEQA Analysis	Current Compost Alternatives being Considered by Waste Management			
		Option 1 Fully enclosed with bio filter In-Building Agitated Compost Blocks. Negative and Positive aeration.	Option 2 Fully enclosed with bio filter In-Building, In-Vessel Composting. No agitation. Negative aeration.	Option 3a Fully enclosed with bio filter In-Building In-Vessel High Solid AD+ In-Vessel agitated digestate Compost. Negative aeration. Option 3b Phase 1. Fully enclosed with biofilter In-Building In-Vessel agitated compost of OFMSW. Negative aeration. Phase 2. Fully enclosed with bio filter In-Building In-Vessel High Solid AD.	Option 4 Fully enclosed with bio filter In-Building Low Solid AD and Pelletized Digestate. Nitrogen, phosphate and magnesium to be added to create an enriched soil amendment as required by end user.
Food/Organics Recycling Facility					
Throughput	1,000 – 1,300 tpd	Same	Same	Same	Same
Material types	MSW (Res./MF/comm'l)				
Building size	60,850 sq. ft.				
Material receipt	Overhead conveyor(s)				
Process methods	Conveyors/screens/separators				
Odor control	Enclosed building; mechanical air handling with bio-filter				
Food/Organics Compost Facility					
Throughput	1,000 tpd	1,000 tpd	1,000 tpd	1,000 tpd	1,000 tpd
Material types	Processed OFMSW	Processed OFMSW	Processed OFMSW	Processed OFMSW	Processed OFMSW
Building size	Up to 190,000 sq ft	Up to 190,000 sq ft	Up to 190,000 sq ft	Up to 190,000 sq ft	190,000 sq ft
Process methods	Anaerobic digestion Aerobic digestion Screening/curing Percolate recycling	Aerobic digestion Screening/curing Percolate recycling	Aerobic digestion Screening/curing Percolate recycling	Anaerobic digestion Aerobic digestion Screening/curing Percolate recycling	Anaerobic digestion Compost pellets Digestate dewatering and circulation/enriched soil amendment pelletizing
Odor control	Fully-enclosed building; mechanical air handling with bio-filter	Fully-enclosed building; mechanical air handling with bio-filter	Fully-enclosed building; mechanical air handling with bio-filter	Fully-enclosed building; mechanical air handling with bio-filter	Fully-enclosed building; mechanical air handling with bio-filter
Finish/by-products	Compost/soil amendment Methane recovery	Compost/soil amendment	Compost/soil amendment	Compost/soil amendment Methane recovery	Compost/soil amendment Methane recovery