

COMPOST SOLUTIONS—ACTIONS TAKEN BY THE LEA IN RESPONSE TO PUBLIC COMMENTS

After reviewing the public comments received, it is the determination of the LEA that the project be allowed to proceed. The LEA has taken the following actions in response to public comments received in writing on April 17, 2012 and April 20, 2012, and at the Public Informational Meeting held on May 3, 2012:

The LEA has added the following items to the Solid Waste Facility Permit (SWFP):

- 1. Specifications (section 4c)—annual and monthly tonnage limits for biosolids and sewage.** The LEA has added annual and monthly tonnage maximums specifically for biosolids. These maximums ensure the facility cannot increase the amount of biosolids received at the facility without the thorough review and public comment process required for a SWFP revision. The monthly maximum prevents the facility from receiving too much material that could overwhelm the biosolids bunkers and require stockpiling of material. The annual maximum of 12,000 tons is obtained from the Mitigated Negative Declaration for the site dated August 15, 2011. The monthly maximum of 1500 tons is based upon biosolids composting bunker capacity.
- 2. Enforcement Agency Conditions (section 17o)—all loads of biosolids and sewage must be covered during transport.** The LEA has added a permit condition requiring all biosolids and/or sewage loads brought to the site be covered. This requirement is listed in the amended CUP but not the proposed RCSI. Adding this condition ensures biosolids loads will remain covered even if the CUP is amended in a way that might allow uncovered loads at a later date.
- 3. Enforcement Agency Conditions (section 17p)—all handling of biosolids and sewage shall take place on the cement pad.** The LEA added this permit condition to ensure that untreated biosolids and sewage are handled exclusively on the impervious cement pad to prevent ground water pollution and control storm water and leachate runoff from leaving the site.
- 4. Enforcement Agency Conditions (section 17q)—biosolids and sewage received at the site shall be placed into a composting process as soon as practical.** The LEA added this permit condition to ensure untreated biosolids are not stockpiled or left outside the composting process for an extended duration to control potential vector or odor nuisances.
- 5. Enforcement Agency Conditions (section 17r)—the operator is required to maintain the cement biosolids pad in good repair.** The LEA added this permit condition to ensure that the LEA can issue a violation for any damage to the biosolids pad observed during an inspection and require corrective action. This is in addition to any pad maintenance and/or sampling requirements that will be required by the Central Valley RWQCB once the new WDR order is issued to the site prior to commencing the composting of biosolids.

The LEA has taken the following action to help address potential odor and storm water issues:

- 1. A contact list has been prepared for odor and storm water complaints.** Odor issues are often subjective; what smells foul to one person might be acceptable to another. As a result, odor issues tend to be a complaint driven process. Storm water issues can be difficult for an enforcement agency to observe, given such issues are typically observed only a few days a year at most. As a result, storm water issues are also best dealt with on a complaint basis, so that the appropriate enforcement agency can be promptly notified and view the issue as it is occurring. The LEA has prepared a list of complaint contacts for distribution to the public to facilitate ease of contact should odor or storm water issues arise.