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Sent: Tuesday, January 12, 2021 9:56 AM
To: 'state.clearinghouse@opr.ca.gov' <state.clearinghouse@opr.ca.gov>
Cc: Escotto, Benjamin@CalRecycle <Benjamin.Escotto@calrecycle.ca.gov>; Debley, Sean <Sean.Debley@ventura.org>; Bertoline, Justin <Justin.Bertoline@ventura.org>
Subject: SCH# 2017081052, Comment Letter for Pacific Rock Quarry Expansion Project Draft EIR

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SCH,

In an effort to assist in your transition to a paperless process, attached is CalRecycle staff's comment letter for **SCH No. 2017081052** – Pacific Rock Quarry Expansion Project Draft EIR – Ventura County.

Thank you.

Ted Tasiopoulos, R.E.H.S.

Environmental Scientist

Waste Permitting, Compliance and Mitigation Division

Permitting and Assistance Branch-South Section

Department of Resources Recycling and Recovery (CalRecycle)

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January 12, 2021

Justin Bertoline, Senior Planner
Ventura County Resources Management Agency
Planning Division
800 South Victoria Avenue, L# 1740
Ventura, CA 93009

Subject: SCH No. 2017081052 – Pacific Rock Quarry Expansion Project – Ventura County

Dear Mr. Bertoline:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The Ventura County Resources Management Agency, Planning Division acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report (Draft EIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The Pacific Rock Quarry Expansion Project is located at 1000 South Howard Road, Camarillo, CA, which is approximately 1.5 miles east of Lewis Road and approximately two miles south of State Highway 101 in unincorporated Ventura County. The proposed project encompasses 204 acres of a 718 acre property which includes the existing mining operation and areas proposed for mine expansion and reclamation. The existing quarry is located within the Tax Assessor's Parcel Number (APN) 234-0-060-220. Proposed expansion areas are within additional portions of APN 234-0-060-220 and a portion of APN 234-0-060-190. Zoning designation is Agricultural Exclusive (AE-40) and Open Space (OS-160).

The proposed project requests the following modifications to existing Conditional Use Permit (CUP) No. 3817-3:

- (1) Amend the current reclamation plan and allow for the expansion of the existing mining area;
- (2) Extend the life of the existing permitted operations for an additional 30 years;

- (3) Extend the operational days from 6 to 7 days per week (adding Sunday for material load out) with additional material load out hours and limited extended 24 hour operations (60 days maximum per year);
- (4) Allow construction and mobile mining equipment in outdoor storage areas;
- (5) Operate a concrete and asphalt recycling plant;
- (6) Allow for imported material to be used in reclamation fill; and
- (7) Replace an existing mobile home to be used as a 24-hour security trailer.

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft EIR, in addition to the specific location noted.

Page 2-12, Section 2.6.6, Proposed Recycle Operations –

The Applicant proposes the use of a portable recycling plant to crush and process recycled concrete and asphalt at the site. The recycling plant would utilize conveyors, a crusher, and screen to recycle materials. Concrete and asphalt debris would be received, crushed, and sold as base material.

Comment: Pursuant to Title 14 California Code of Regulations (14 CCR) Section 17381(e)(1)(A) and (k)(1), concrete and fully cured asphalt are defined as “construction and demolition debris” and “inert debris” (CDI). Pursuant to 14 CCR 17381.1(a), a site that receives only construction and demolition debris and inert debris and which meets the requirements of the section shall be classified as a CDI recycling center or inert debris recycling center and not be subject to the construction and demolition/inert debris regulatory requirements. In accordance with 14 CCR Section 17381.1(h), sites which do not meet the applicable requirements of 14 CCR Section 17381.1(a), do not qualify as recycling centers and shall comply with Article 5.9 – Construction and Demolition and Inert Debris Transfer/Processing Regulatory Requirements, and all laws and regulations applicable to them. Also, per 14 CCR Section 17381.1(h), the burden of proof shall be on the owner and operator of a site to demonstrate that the activities at the site are not subject to the requirements of Article 5.9.

Page 2-12, Section 2.6.7, Proposed Fill Import and Export –

Clean fill material would be imported to the site and processed for sale as aggregate material or used in preparing pad areas of the site for the end use of agriculture. Fill material would consist of soil, mud, rocks, and minor amounts organic material, but would not contain construction debris.

Comment: Pursuant to 14 CCR Section 17388.2(a) and (a)(1), the following disposal activities do not constitute construction and demolition waste or inert debris operations or facilities: any use (e.g., grading) of gravel, rock, soil, sand, and similar, whether processed or not that has never been used in connection with any structure, road, parking lot, or similar use. Pursuant to 14 CCR 17852(a)(11), “compostable

material” means any organic material that when accumulated becomes active compost. Per 14 CCR 17852(a)(15)(B)(2), disposal of compostable material does not include the use of compostable material for mine reclamation in accordance with applicable law. However, the proposed use of organic material for fill may be considered disposal and subject to solid waste regulatory requirements.

Solid Waste Regulatory Oversight

The Ventura County Resource Management Agency, Environmental Health Division is the Local Enforcement Agency (LEA) for Ventura County and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact the LEA, Sean Debley, at 805.654.2813 or Sean.Debley@ventura.org to discuss the regulatory requirements for the proposed project.

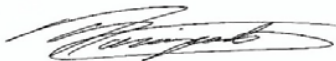
CONCLUSION

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

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6084 or by e-mail at Theodore.Tasiopoulos@calrecycle.ca.gov.

Sincerely,



Theodore Tasiopoulos, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Sean Debley, Manager
LEA