



June 29, 2010

Ronald Gee
Napa County Conservation Development and Planning
1195 Third Street, Suite 200
Napa, CA 94559

RE: Response to comments by the Napa County agencies regarding the Clover Flat Resource Recovery Park CUP Major Modification

Dear Mr. Gee:

On behalf of the Clover Flat Landfill, Inc. (CFL), Edgar & Associates is addressing the final round of comments by the Napa County agencies regarding the Clover Flat Resource Recovery Park CUP Major Modification application in an "issue and response" format as attached.

Should you have any questions, please call me at (916) 739-1200.

Sincerely:

A handwritten signature in black ink, appearing to read 'Evan WR Edgar', is written below the 'Sincerely:' text.

Evan WR Edgar
Principal Civil Engineer

cc: Bob Pestoni, Clover Flat Landfill, Inc.
Greg Pirie, Napa County LEA

Greg Pirie letter dated June 20, 2011:

Project Background and overview

- Revised Closure Plan
 - The operator has reviewed Title 27, and for the purposes of the CUP application has submitted topographic information, revised operational areas, decreases in volume amounts and changes to the closure date based upon the proposed closure plan changes.
 - The operator is committed to prepare a Revised Closure Plan addressing all of the Title 27 elements as part of the upcoming Solid Waste Facility Permit Revision application package later this year.
- Personnel
 - The current full-time employee shift of up to 16 people will increase up to 20 employees with the expansion.
 - The number of visitors, vendors, and employees will not exceed 25 trips per peak day.
- New equipment
 - New biomass gasification unit.
 - New scalehouse and scales.
 - New landfill gas-to-energy unit will be installed in early 2012 under the previous CUP very minor modification.
 - Relocated MRF processing equipment will be the same.
 - Same landfill equipment.
 - Same processing equipment or equivalents.
 - Add one small front-end loader.
- Permitted Facility Boundary.
 - Figure 3A shows the details on the increase in the permitted SWFP boundary by 1.01 acres. The boundary will be more clearly defined.
- MRF Location
 - The wind varies in the micro-climate below the ridge line and swirls in diverse directions without a standard flow pattern. The MRF will continue to be canopied, and water hoses will continue to be used for dust suppression. The fines screening will take place on the far side from the scale and towards the cut slope that offers better protection. During the SWFP Revision process, the detailed “Dust Minimization Plan” will be presented where the proposed Site Plan and equipment layout can be modified to minimize dust generation

Gate Operations

- Stockpile Plan
 - The Stockpile Plan will be submitted prior to the start of excavation for the 70,000 CYD cut material from the Recycling Pad location at the gate.

Landfill Operations:

- Figure 3A does show the traffic patterns and will be updated to be more specific patterns with a more defined.
- The in-vessel food waste will be placed on a compacted inert fill and will be maintained to prevent ponding.
- Contaminated green waste would be green material not suitable for mulching and the associated market, and would include greater than 5% contamination, and sometime lower if the contamination is plastic.

Ron Gee's email of June 20, 2011

Traffic

Excerpts about traffic throughout the CEQA Project Description is copied below for reference, and then will be modified to answer the traffic questions raised about further breaking down traffic and accounting for all of the at activity.

The operator will no longer accept traffic after 275 VPD has crossed the scale.

There are over 81 VPD of peak traffic count available to accommodate the traffic from dropping of residential food waste, delivering wood chips, transferring food waste, and back-hauling materials and commodities. Employees' traffic count will be 16 VPD peak now and could go up to 20 VPD into the future, and are not counted towards the SWFP permitted traffic volume following LEA practices in the County. In the name of economic efficiencies and standard industry practice, contractors and gardeners that drop off their wastes and materials, typically back haul recycled materials and soil amendments in the same vehicle at the same trip, where back hauls would not count as an additional trip. In the cases where a customer is coming solely to purchase products, that vehicle will be included in the permitted traffic counts of 275 vehicles per day.

From page 13-14 of the CEQA Project Description

The waste amounts, traffic counts and operating hours will remain the same and no changes are being proposed as part of this project. The scale house will continue to manage the receipt of waste and materials within the current entitlements of 600 TPD and 275 round-trip vehicles per day (VPD), as allowed by the current SWFP and is proposed to be the same in the SWFP Revision. **The operator will no longer accept traffic after 275 VPD has crossed the scale.**

Tons and traffic vary with seasons and economic cycles, and it would be an exhaustive exercise to analyze all potential scenarios of waste types and traffic. Table 4 presents the major operations expected during peak activity. The peak traffic distribution by activity in Table 4 below was presented for the purposes of calculating the air emissions impacts and presents a

worst case scenario in terms of traffic counts to determine a peak corresponding mobile emissions amounts.

Table 4
Clover Flat Resource Recovery Park - Peak Traffic and Annual Traffic Count Estimates
for the purpose of estimating daily and annual emissions from mobile sources

Resource Recovery Park Activity	Peak Daily Activity Tons/Traffic TPD Vehicles per Day (VPD)	Average Daily Activity Tons/Traffic TPD Vehicles per Day (VPD)	Annual Activity 310 days per year Tons per Year (TPY) Vehicles per Year (VPY)
Inbound Landfill operations	200 TPD	160 TPD	50,000 TPY
6 tons per Collection/Recycling Truck with 16.4 miles average distance	20 trucks for 120 TPD	18 trucks for 108 TPD	5,580 VPY
0.8 tons per Self-Haul with 25.70 miles average distance	100 vehicles for 80 TPD	65 vehicles for 52 TPD	20,150 VPY
Total Landfill Traffic	120 VPD	83 VPD	25,730 VPY
Inbound Material Recovery Facility adding commercial recyclables	300 TPD	200 TPD	62,000 TPY
5 tons per Collection/Recycling Truck with 16.4 miles average distance	40 trucks for 200 TPD	30 trucks for 150 TPD	9,300 VPY
1 ton per Self-Haul with 25.70 miles average distance	100 vehicles for 100 TPD	50 vehicles for 50 TPD	15,500 VPY
Total Mixed Recyclables Processing Facility Traffic	140 VPD	80 VPD	24,800 VPY
Inbound Source-separated Recycling Drop-off operations	100 TPD	60 TPD	18,600 TPY
6.7 tons per Collection/Recycling Truck with 16.4 miles average distance	15 trucks for 100 TPD	12 trucks for 60 TPD	3,720 VPY
Total Landfill, Mixed Recyclables Processing, Recycling, as permitted under current SWFP	Inbound 600 TPD SWFP peak	Inbound 420 TPD average annual	Inbound 130,600 TPY
	275 VPD SWFP peak	175 VPD average annual	54,250 VPY

The average traffic count in 2009 was 115 VPD with a peak of 194 VPD occurring on April 14, 2009. There are over 81 VPD of peak traffic count available to accommodate the traffic from dropping of residential food waste, delivering wood chips, transferring food waste, and back-hauling materials and commodities. Employees' traffic count will be 16 VPD peak now and into the future, and are not counted towards the SWFP permitted traffic volume following LEA practices in the County.

Table 5
Historical and Project Traffic Count Estimates

	2009 Traffic Counts	Typical Project Traffic Estimates Worst Case Air Emissions
Self-Haul	168 VPD peak day 86 VPD average	200 VPD peak 115 VPD average
Collection Trucks	30 VPD peak day 14 VPD ave	75 VPD peak 30 VPD average
Transfer Trucks	10 VPD peak day 1 VPD ave	
Total Traffic	194 VPD peak on 4/14/09 115 VPD average	275 VPD peak

Increase the Storage of Recyclable Materials and Commodities on page 16-17 of the CEQA Project Description:

The current SWFP allows 275 round-trip vehicles per day, and Project is not proposing an increase in the traffic volume. The operator will no longer accept traffic after 275 VPD has crossed the scale. The green waste processing program, the food waste composting program, and any sales of materials, will be part of the 275 vehicles per day. Typically the sales of material are back-hauled from CFL after a customer has used the Facility. The anticipated vehicle trips to purchase materials are already included in the traffic counts. In the name of economic efficiencies and standard industry practice, contractors and gardeners that drop off their wastes and materials, typically back haul recycled materials and soil amendments in the same vehicle at the same trip, where back hauls would not count as an additional trip. In the cases where a customer is coming solely to purchase products, that vehicle will be included in the permitted traffic counts of 275 vehicles per day.

Traffic trips per new operational areas:

- Back haul of material will not count against the 275 VPD.

Add Residential Food Waste Drop-off Program on page 25 of the CEQA Project Description:

The anticipated vehicle trips to purchase materials are already included in the traffic counts. The rule of thumb is that the users of the Facility are contractors and gardeners that drop off their wastes and materials, and back haul the recycled materials and soil amendments in the same vehicle at the same trip, where back hauls would not count as an additional trip. In the cases where a customer is coming solely to purchase products, that vehicle will be counted against the permitted traffic counts of 275 vehicles per day.

Traffic trips per new operational areas:

- Dropping off residential food waste while using other aspects of the Facility will only count as one trip towards the 275 VPD.
- Should the vehicle trip only use the residential food drop-off program, then the trip would count towards the 275 VPD

- The total anticipated use of the food waste program will be minimal at best, and is only provided as an interim convenience until a residential food waste collection program is approved.
- Assume 25 users per month where 20 are using other aspects of the Facility, and 5 users per month just use the food waste drop-off program. The amount of material could be .3 tons per month, or up to 4 tons per year.
- 5 users per month or 0.2 VPD will be added as a new VPD under inbound MRF/recyclables material row.

Add In-Vessel Food Waste Composting and Food Waste Transfer Operations on page 26 of the CEQA Project Description:

Should on-site composting not be economically feasible due to the smaller scale, as an option, the food waste composting may occur at an off-site permitted compost facility, and the food waste would be transferred from the bunkers or in the full vessels to a permitted compost facility. The amount of food and green waste that could be transferred off-site to a permitted facility could be 13,000 tons per year, or up to 42 TPD day, or 2 transfer trailer vehicles per day.

Traffic trips per new operational areas:

- 42 TPD in collection trucks of 6 tons per load, or 7 VPD. A commercial route truck would be reassigned from MSW to commercial organics from the existing waste stream, where up to 6 tons per load would be a low average. This traffic would be associated with the inbound landfill operations, and is part of the current 18 trucks per days already assigned to the landfill.
- 2 VPD would be needed to transfer the material off-site, and will be added to the outbound row in Table 4.B.

Increase the Storage of Recyclable Materials and Commodities on page 29 of the CEQA Project Description:

Should there be independent trips just for commodity sales, those trips would be allowed and would count against the permitted 275 vehicles per day. The realistic assumption is present below, where the users of CFL will have access to commodities for sale. The Facility is used by licensed contractors that typically back haul material whenever possible and is presented as a convenience to the residents of the Upper Valley that may request local compost and mulches. Typically, bulk and volume sales will occur with the current system where UVDS deliver loads of composts and mulches to the customer. The amount of retail sales from on-site users hopefully increases to over 1,000 tons per year.

Traffic trips per new operational areas:

- Dropping off C&D or MSW while back-hauling recycled product will only count as one trip towards the 275 VPD.
- Anticipated use of retails sales is 1,000 tons per year, or 83 tons per month, or 3.2 tons per day. With an average load of 0.5 tons per load, an average of 7 VPD, or 10 VPD peak could be expected, and will be added as a new VPD under inbound MRF/recyclables material row.

Traffic Impacts for the Biomass Gasification Unit on page 33 of the CEQA Project Description:

To ensure a sustainable supply of wood chips, 1.5 transfer trailers per day carrying 30 tons of wood chips per day may be needed on a seasonally or intermittent basis.

Traffic trips per new operational areas:

- 1.5 VPD average and 2 VPD peak will be added to a new line item for the Biomass Gasification unit

Traffic Impacts for the Outbound Material on page 15 of the CEQA Project Description:

Table 6 – Anticipated CFRRP Project Recycling Rate

	Average TPD	Recycling Tons/ Disposal Tons	Facility Recycling Rate
Landfill operations	100 TPD direct 60 TPD residual from the MRF	0 TPD Recycling/ 100 TPD Disposal	0%
Material Recovery Facility adding dry commercial recyclables	200 TPD	140 TPD Recycling/ 60 TPD Disposal	70%
Source-separated Recycling Drop- off operations	60 TPD	59 TPD Recycling/ 1 TPD Disposal	99%
Total CFRRP	420 TPD	199 TPD Recycling/ 161 TPD Disposal	55%

Traffic trips per new operational areas:

- 199 TPD of recycled material could be transferred off-site on an average day. At an average load of 20 tons per load in a transfer trailer, the 10 VPD leave the Facility, and a peak of 13 VPD could occur.
- 10 VPD average and 13 VPD peak will be added to the transfer the material off-site, and will be added to the outbound row in Table 4.B.

Response to Traffic comments on additional details considering all potential traffic

Table 4 will remain current in the Project Description and can be considered Table 4-A that was compiled for the purpose of conservatively estimating the daily and annual emissions from mobile sources, and below is a new Table 4-B that includes all potential traffics in one table. Column 1 remains the same for the major operational areas and what 600 TPD could look like at 275 VPD with the addition of incremental traffic for the proposed new operations. Column 2 remains the same for the same major operational area as the typical average daily traffic at 420 TPD and 175 VPD with the addition of incremental traffic for the proposed new operations. Column 3 is new and will explain how the new incremental traffic trips fit into the traffic counts. Note that the peak day in 2009 was 194 VPD peak on April 14, 2009 and with an average monthly count of 115 VPD average in April 2009.

Table 4 - B
Clover Flat Resource Recovery Park - Peak Traffic and Annual Traffic Count Estimates

	1	2	3
Resource Recovery Park Activity	Peak Daily Activity Tons/Traffic TPD Vehicles per Day (VPD)	Average Daily Activity Tons/Traffic TPD Vehicles per Day (VPD)	Peak Daily Traffic Use Average Daily from all possible traffic
Inbound Landfill operations	200 TPD	160 TPD	Food waste that was brought in as MSW to the landfill may be collected with same packer truck and be taken to the on-site compost facility. No change in VPD.
6 tons per Collection/Recycling Heavy Duty Truck with 16.4 miles average distance	20 trucks for 120 TPD	18 trucks for 108 TPD	
0.8 tons per Self-Haul with 25.70 miles average distance	100 vehicles for 80 TPD	65 vehicles for 52 TPD	
Total Landfill Traffic	120 VPD	83 VPD	
Inbound Material Recovery Facility adding commercial recyclables	300 TPD	200 TPD	Drop-off food waste and back-haul of materials as new trips that do not use the facility for other purposes may account for up to 10.2 VPD. There are 100 VPD allotted for self-haul, and those new trips will be classified here and be part of the 100 VPD.
5 tons per Collection/Recycling Heavy Duty Truck with 16.4 miles average distance	40 trucks for 200 TPD	30 trucks for 150 TPD	
1 ton per Self-Haul with 25.70 miles average distance <ul style="list-style-type: none"> Drop-off food waste Back haul retail recycled material 	100 vehicles for 100 TPD 0.2 VPD 10 VPD	50 vehicles for 50 TPD 0.2 VPD 7 VPD	
Total Mixed Recyclables Processing Facility Traffic	140 VPD	80 VPD	
Inbound Source-separated Recycling Drop-off operations	100 TPD	60 TPD	No change – mandated commercial recycling tons
6.7 tons per Collection/Recycling Heavy Duty Truck with 16.4 miles average distance	15 VPD for 100 TPD	12 VPD for 60 TPD	15 VPD
Heavy Duty Transfer Trailers			15 VPD
Biomass Gasification Unit – Inbound Heavy Duty Transfer Trailer	2.0 VPD	1.5 VPD	There are 15 VPD of transfer trailers that were not line item but are part of the 60 VPD of heavy duty vehicles allocation, 15 VPD will be included in the 60 VPD.
Outbound Heavy Duty Transfer Trailers <ul style="list-style-type: none"> Food Waste Transfer Option 200 TPD of recycled material 	2 VPD 13 VPD	2 VPD 10 VPD	
Total Landfill, Mixed Recyclables Processing, Recycling, as permitted under current SWFP	600 TPD SWFP peak	420 TPD average annual	600 TPD SWFP peak
	275 VPD SWFP peak	175 VPD average annual	275 VPD SWFP peak
Employees and visitors Napa County LEA does not count these trips as part of the SWFP	25 VPD peak	20 VPD	25 VPD peak