



COUNTY of NAPA

LOCAL ENFORCEMENT AGENCY

Nancy Watt
LEA Manager

GREG PIRIE
LEA Coordinator

February 25, 2005

RECEIVED

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DEPT. OF
ENVIRONMENTAL MANAGEMENT

Jill Pahl
Napa-Vallejo Waste Management Agency
1195 Third Street Suite 101
Napa, CA 94559

RE: Response to Comments – Devlin Road Transfer Station Construction and Demolition Recycling Project. Proposed Mitigated Negative Declaration.

Dear Ms. Pahl,

The Napa County Solid Waste Local Enforcement Agency has reviewed the proposed Mitigated Negative Declaration (MND) and has the following comments. The project is identified to be implemented in two phases. Phase 1 which includes directing loads of C/D material via a newly constructed access road to be processed on the back asphalt pad. Mobile equipment will be used to sort, crush and process the material. Phase 2 includes constructing a 41,600 sq. ft. building to fully enclose all C/D processing. The building will be adjacent to the current Devlin Road Transfer Station (DRTS) building.

A revision to the Solid Waste Facility Permit (Permit) would be required for Phase 2. Phase 1 may be implemented by amending the Transfer Processing Report, but further details are needed for the LEA to make this determination. The LEA is currently processing a 5-year permit review, and has discussed different ways of implementing Phase 1 of the project with you. This is still pending.

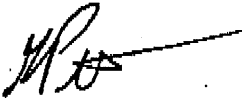
Two major areas related of the Permit include maximum number of vehicles and tons of daily incoming municipal solid waste (C/D included). As stated under Section III – Air Quality and Section XV – Transportation/Traffic, the automobile and truck trips would not increase, the project will be processing C/D loads that have already been delivered as part of the entire waste stream currently received at the DRTS. Since it is not specifically stated, and given the above language, the daily maximum permitted tons of material that can currently be received at the DRTS will not be increased. Thus, the maximum vehicles per day, and the maximum tons received permit, as stated in the Permit, will remain the same and the processing of C/D material will come from the existing flow of material to DRTS. If the current permitted tons per day of incoming material is exceeded (1440 ton/day), further environmental review will be needed.

Further comments or clarification:

- It is unclear exactly what equipment (vehicles to crush, separation equipment etc.) will be used in Phase 1 and which for Phase 2. This is important since the processing impacts would be different for each.
- It is unclear exactly how the processing will occur in the Phase 2 building in terms vehicle drop off, type of processing equipment/vehicles, and any impacts that may occur inside the building.
- It would be important to know the routing of vehicles for Phase 2 in relation to the current DRTS building.
- Clarification on the exact mode of drop-off and customer and processing vehicles in the proposed C/D building would be needed to know what impacts could be anticipated, including dust control and visibility.
- Transfer processing regulations in Title 14 require solid waste removal from the facility every 48 hours. This standard is applicable for the DRTS now and would also be applicable for the C/D material. There no discussion of specific processing time. Alternate frequencies other than removal every 48 hours can be approved by the LEA.

Thank you for the opportunity to comment on the proposed project. Please consider the comments, response, and any further environmental review that would or would not be needed for any future revised Permit application submitted to the LEA. Please contact me if you would like any further clarification on how the MND relates to your Permit.

Sincerely,



Greg Pirie, REHS
LEA Coordinator
Napa County Local Enforcement Agency
707-253-4144

CC: Nancy Watt, LEA Manager, County CEO.