

## Edwards, Dawn

From:	Curry, Damien, CDA <damien.curry@acgov.org></damien.curry@acgov.org>
Sent:	Friday, January 10, 2020 9:08 AM
То:	Edwards, Dawn; Tice, Leslie
Subject:	FW: Jess Ranch DEIR Comments
Attachments:	Jess Ranch DEIR comments.doc
Categories:	Important

From: johnb@morcompost.com <johnb@morcompost.com>
Sent: Friday, January 10, 2020 8:36 AM
To: Curry, Damien, CDA <damien.curry@acgov.org>
Cc: Michael Harding <mikeharding@sbcglobal.net>
Subject: Jess Ranch DEIR Comments

Damien:

Attached is our comment letter on the Jess Ranch DEIR.

It was one of the most comprehensive environmental reports on a rural composting project we've seen in over 13 years. I wish it would have contained more detail on actual feedstock sources/characteristics, the recommended composting process and operations.

John Bouey P.E. Managed Organic Recycling, Inc. 510-316-4078 johnb@morcompost.com



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January 9, 2020

Managed Organic Recycling, Inc 1356 Palm Street

San Luis Obispo, CA 93401 Ph 510-316-4048

Damien Curry ATTN: Jess Ranch Compost Facility / PLN 2015-00087 Alameda County Community Development Agency 224 W. Winton Avenue, Suite 111 Hayward, CA 94544

The DEIR covers the normal impacts associated with construction and facility operation, but it is weak on the actual details of an operating composting facility. It provides general discussion of process types, i.e. windrow composting, aerated static piles, negative and forced aeration, covered vs uncovered piles; however, the reader, especially those not knowledgeable of how a composting facility operates, is left to guess what goes on inside pads shown on PAGE 5. This is especially critical for composting areas 1 and 2 and the aerated curing area. Absent detail, it is difficult to comment on issues, such as fire protection, materials handling, and traffic flow on the sealed surfaces at the site.

Has any consideration been given to using solar power to aerate the piles? Positive aeration will be more efficient than a negative aeration system (generally uses 2/3rds less power).

Are the piles aerated with a common blower (manifold aeration)? This type of aeration is substantially more costly due to elaborate controls and piping. Also, if a mechanical failure occurs, it impacts a greater portion of the process.

Has consideration been given to solar powering the blowers? Solar panels would provide substantial sqft of surface area to collect stormwater for storage which could be used for moisture control (Altamont Pass is dry and windy during the summer).

What particulate control measures are incorporated in the design (bulking agent grinding and storage area)?

What is the emission control standard for volatile organic compounds (VOC) for the project? Does San Joaquin Valley Air Pollution Control District's Rules have any impact on VOC emissions, i.e., 90% reduction of VOCs?

John Bouey, President Managed Organic Recycling, Inc. 9312 Skyline Blvd. Oakland, CA 94611

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Letter #2B

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Damien Curry Alameda County Planning Department 510.670.6684

## \*\*\*The Planning Dept is working normal business hours and remotely in compliance with the Shelter in Place Order issued by the County Public Health Officer\*\*\*

From: johnb@morcompost.com <johnb@morcompost.com>
Sent: Wednesday, November 18, 2020 5:44 AM
To: Curry, Damien, CDA <damien.curry@acgov.org>
Cc: jeff thurber <jeff.thurber@denaliwater.com>
Subject: RE: Fw: Jess Ranch follow-up

## Damien:

Thank you for your response. However, I was hoping to get more information on the key features of the system, such as Pad 1 (Active Composting Area, number of piles/bunkers), Pad 2 (Active Composting Area, number of piles/bunkers), Curing Area (volume), Pad 3 (Final Product Curing Area, residence times). What is the volume of the receiving bldg. (how is the biofilter sized/residence time)? Was a materials flow schematic prepared for the design?

Even some preliminary detail would be helpful as it would should how the plant expansion from 250t/yr to 1,000t/yr could be accomplished.

Again do you have a contact at HDR that I can contact to discuss the process?

John Bouey P.E. Managed Organic Recycling, Inc. 510-316-4078 johnb@morcompost.com



------ Original Message ------Subject: Fw: Jess Ranch follow-up From: "Curry, Damien, CDA" <<u>damien.curry@acgov.org</u>> Date: Tue, November 17, 2020 4:32 pm To: "johnb@morcompost.com" <johnb@morcompost.com>

John here is the information you were seeking

Damien Curry Alameda County Planning Department 510.670.6684

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