To: **Decision-Makers**

From: Joddi Leipner, Environmental Engineering Project Leader
John Hancock, Interim Compliance Manager
Santa Barbara County Public Works Department
Resource Recovery and Waste Management Division (RRWMD)

Prepared with the assistance of Padre Associates, Inc.

DATE: August 12, 2024

RE: **CEQA 15164 Determination for the Proposed Advanced Treatment System for Treatment of ReSource Center Compost Management Unit (CMU) Runoff (Project Description Change No.7)**: Finding that Section 15164 of the State CEQA Guidelines applies to minor changes to the ReSource Center at the Tajiguas Landfill and the Tajiguas Landfill Expansion Project. CEQA Guidelines Section 15164 allows an Addendum to be prepared when only minor technical changes or changes that do not create new significant impacts would result. The Final Subsequent EIR (SEIR)(12EIR-00000-00002, SCH #2012041068) and the SEIR Revision Letter and Errata dated May 27, 2016 and SEIR Addendum dated August 11, 2017 (revised October 26, 2017), 15162 determinations dated January 15, 2020, May 18, 2020, and August 2, 2021 and the Final EIR (01-EIR-05) for the Landfill Expansion Project as modified by a November 8, 2006 Addendum, April 19, 2007 15162 determination, 08EIR-00000-00007 for the Tajiguas Landfill Reconfiguration Project and February 12, 2018 Addendum are hereby amended by this Addendum.

Location: The project is located at the Tajiguas Landfill on Assessor's Parcel Numbers (APN) 081-150-042, 081-150-019 and 081-150-026, located approximately 26 miles west of the City of Santa Barbara, along the Gaviota coast, Third Supervisorial District.

Background

Tajiguas Landfill Operations

The Tajiguas Landfill has been in operation since 1967, pre-dating both the California Coastal Act enacted in 1976 and CEQA enacted in 1970. Since CEQA was enacted the Tajiguas Landfill has been expanded three times. The Santa Barbara County Board of Supervisors certified an EIR (01-EIR-05) for, and approved, the Tajiguas Landfill Expansion Project (Front Canyon Expansion) on August 13, 2002. All applicable permits to construct and operate the expansion were received in 2003. The Tajiguas Landfill Expansion Project consisted of the horizontal and vertical expansion of the Landfill outside of the Coastal Zone, providing 8.2 million cubic yards (mcy) of additional waste disposal capacity for a total permitted capacity of 23.3 mcy.

On December 5, 2006, the Board of Supervisors approved an Addendum to 01-EIR-05 for minor changes to the approved Tajiguas Landfill Expansion Project. The changes included elimination of the Coastal Zone Southeast Corner Modification and reconfiguration of the North Slope borrow/stockpile area. Reconfiguration of the waste footprint associated with the Expansion Project (Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project) was proposed to reduce earthwork requirements and improve waste disposal operations. A Subsequent EIR (08EIR-00000-00007) was prepared for this project and certified by the Board of Supervisors on May 5, 2009. The Tajiguas Landfill Capacity increase project was reviewed in 23EIR-00001. It was assumed that intercepted groundwater below the Landfill would be used for dust control or collected and discharged to Pila Creek and that collected leachate would be used for dust control and/or taken off-site for treatment/disposal. Pursuant to RWQCB requirements, intercepted groundwater and leachate are only used for dust control on lined areas of the Landfill and the excess is taken off-site.

ReSource Center

A Final Subsequent EIR (SEIR)(12EIR-00000-00002, SCH #2012041068) and SEIR Revision Letter and Errata dated May 27, 2016 were certified by the Board of Supervisors for the Tajiguas Resource Recovery Project (currently named the ReSource Center) on July 12, 2016 and SEIR Addendum dated August 11, 2017 (revised October 26, 2017) was considered by the Board of Supervisors for the TRRP on November 14, 2017. The ReSource Center as revised by Project Description (PD) Change No. 7 (and previously approved PD changes) is referred to as the "revised project" for the purposes of this CEQA 15164 Determination.

Six determinations under Sections 15162 or 15164 of the State CEQA Guidelines have been prepared since the Final Subsequent EIR and the 2017 Addendum were completed for project description changes including:

1. The change in the provision of natural gas to the ReSource Center (PD Change No. 1, pending implementation as a part of a separate project under review by Santa Barbara County Planning and Development Department) - 15162 Determination.

2. The change in the location of the RRWMD maintenance shop, the construction of a new maintenance shop to service the ReSource Center Materials Recovery Facility (MRF) and the change in ground water supplies (increased extraction from Well No. 5 and new Wells No. 7 and No. 8) to serve the ReSource Center and the Tajiguas Landfill (PD Change No. 2, approved) - 15162 Determination.

3. Engineering design changes to the Material Recovery Facility (MRF), Anaerobic Digestor Facility (ADF) and Compost Management Unit (CMU) that were made during final design and construction (PD Change No. 3, approved) - 15162 Determination.

4. Changes in the MRF operating hours to include two operations shifts occurring between 5 a.m. to 9 p.m., with a maintenance shift between 9 p.m. and 5 a.m. (PD Change No. 4, approved) - 15162 Determination.

5. Engineering design changes to replace the MRF biofilters with a new air quality management system following the Alisal Fire, addition of a new backup generator, and implementation of a Gore Cover System at the CMU (PD Change No. 5, approved) - 15164 Determination.

6. Engineering design changes to allow MRF domestic wastewater to be used as make-up water in the ADF percolate system (PD Change No. 6, approved) - 15162 Determination.

The potential environmental impacts of constructing and operating the ReSource Center were evaluated in the SEIR, a mitigation measure monitoring and reporting plan was adopted, and findings were made pursuant to CEQA Guidelines Sections 15091 and 15093. Primary facilities developed as a part of the ReSource Center are a MRF, ADF and CMU. The ReSource Center was constructed between 2018 – 2021 and commenced operations in 2021.

The Tajiguas Landfill is enrolled, and the Tajiguas ReSource Center is in the process of enrolling, under California's General Permit for Stormwater Discharges Associated with Industrial Activities (IGP) Order No. 2014-0057-DWQ (NPDES No. CAS000001) as Amended by Order No. 2015-0122-DWQ & Order No. 2018-0028-DWQ, issued by the California State Water Resources Control Board (SWRCB) and Stormwater Pollution Prevention Plans (SWPPPs) document their stormwater quality control practices. Additionally, the Landfill and ReSource Center are regulated by Solid Waste Facility Permit (SWFP) No. 43-AA-0015, issued by the Santa Barbara County Department of Environmental Health on February 2, 2017, acting as the local enforcement agency (LEA). With regards to the ReSource Center CMU, the County is also covered under the General Waste Discharge Requirements for Composting Operations Order WQ 2020-0012-DWQ ("Compost Order"). The Compost Order identifies that stormwater and compost pile leachate from the CMU operation are wastewater and prohibited from discharge to a surface water body.

To address water quality notices of violation from the RWQCB regarding wastewater discharges from the CMU operations and to address requirements of the Compost Order, RRWMD is proposing to modify how wastewater from the CMU is managed. Management of stormwater was discussed in the ReSource Center Subsequent EIR (12EIR-00000-00002, SCH #2012041068) and SEIR Revision Letter and Errata SEIR Addendum dated August 11, 2017 (revised October 26, 2017) including collection of stormwater using Baker tanks and a 325,000 gallon runoff storage tank, with an overflow system to the North Sedimentation Basin when the design storm was exceeded. Collected runoff was to be used for moisture conditioning of the open-air compost windrows.

As part of the October 2017 Addendum, the CMU Run-off Storage Tank was increased in size to provide a net capacity of 380,000 gallons after consideration of seismic standards and the location of the tank was moved.

The runoff collection system for the CMU was approved by the RWQCB as a part of the Technical Report for the Tajiguas Resource Recovery Project and Sanitary Landfill – Compost Management Unit submitted by John Kular Consulting for MSB dated April 6, 2021.

Also, as part of PD Change No. 5, the open-air windrow composting process was changed to an aerated static pile system utilizing a Gore Cover System. This system reduces stormwater contact with the digestate/compost and reduced the need for moisture conditioning of the compost piles using stored stormwater. Stored stormwater is used for percolate system make up water instead; however, during wet weather periods the large volume of wastewater (stormwater and leachate) exceeds the volume of water that is needed in the percolate system.

Proposed Changes to the Approved Project Description

Installation of an Active Treatment System

Since installation of the original CMU runoff collection system, pursuant to the requirements of the Compost Order, the RWQCB has determined that, even with the implementation of the Gore Cover system, stormwater contacting the CMU surface and water leaching from the curing compost piles is wastewater. The wastewater must be collected and cannot be discharged without treatment or allowed to overflow into the Landfill stormwater drainage system. This system ultimately discharges to the North Sedimentation Basin, Pila Creek and the Pacific Ocean. In addition, mitigation ***MM TRRP WR-4: Water Quality Monitoring and Corrective Action Plan*** from the ReSource Center SEIR (12EIR-00000-00002) requires identification of additional water quality best management practices if stormwater sampling indicates runoff from the CMU does not meet applicable water quality standards.

Therefore to meet the requirements of the Compost Order and ***MM TRRP WR-4***, RRWMD is proposing to install and operate an Active Treatment System (ATS) to treat CMU wastewater and to apply for coverage under the Central Coast Region's NPDES General Permit for Discharges with Limited Threat to Water Quality Order No. R3-2022-0035 NPDES No. CAG99304 (Limited Threat General Permit) to discharge the treated wastewater to Pila Creek through the Landfill's North Sedimentation Basin. This proposal was documented in the wastewater management plan section of the CMU Technical Report (Report) prepared by Geosyntec Consultants in June 2024 that was submitted to the RWQCB.

With implementation of the ATS, CMU wastewater would continue to be captured and conveyed to the two 20,000-gallon capacity Baker tanks adjacent to the compost curing area, which are equipped with baffles to remove solids from the CMU runoff. Currently, CMU runoff is pumped from each Baker tank up to the 380,000-gallon CMU Runoff Storage Tank (now referred to as the CMU Wastewater Storage Tank) through an existing 10-inch-diameter HDPE pipeline.

To accommodate high intensity storm flow (e.g., 25-year, 24-hr storm event as required in the Compost General Order), an additional pipeline and upgraded pumps will need to be installed between the Baker tanks and CMU Wastewater Storage Tank. From the CMU Wastewater Storage Tank, wastewater would either be transferred to the ADF percolate tanks for use as make up water, to Tank No. 2 if additional

storage capacity is needed (see contingency discussion below) or to the proposed ATS. The ATS would be a package system housed within a dedicated 120-foot by 50-foot (approximately 6,000 square foot) area in an existing disturbed area adjacent to the CMU Wastewater Storage Tank (see proposed ATS site in Figures 1 and 2). The pad for the ATS would be leveled and surfaced with concrete or aggregate base. The ATS would be housed in maximum 20-foot-high containers with an integrated human-machine interface, real-time water quality instrumentation, automated process controls, and remote monitoring capabilities and entirely electrically operated (see Figure 3). The specific equipment sizing, chemical dosages, and operational parameters would be initially determined during the detailed engineering design phase and then refined/optimized during the initial system startup testing phase based on the influent water quality characteristics and regulatory discharge requirements. Up to three new emergency generators (including one at the ATS, one for the transfer pump(s) from CMU Wastewater Storage Tank to Ridge Line Tank 2 and one for the transfer pump(s) from Tank 2 to CMU Wastewater Storage Tank) may be required. An existing diesel-powered emergency generator already approved for use at the ReSource Center or a new diesel generator(s) may be installed to provide electrical power to the ATS in the event of a power outage (possibly associated with a regional wildfire) at the Landfill. Since the size and operating parameters of a new generator(s) are not known at this time it is not currently included in this analysis.

The ATS is anticipated to be designed to treat up to approximately 630 gallons per minute (maximum daily treatment capacity of 0.9 million gallons per day) of CMU runoff from the CMU Wastewater Storage Tank. An overall process flow diagram for the ATS is provided as Figure 3. The ATS would provide several treatment processes designed to meet the effluent limits defined in the Limited Threat General Permit, including the removal of iron, copper, zinc, nitrate, nitrite, ammonia, phosphorus, Chemical Oxygen Demand (COD), and bacteria (*E. coli*). The first stage of treatment would be an ammonia pretreatment step, which involves increasing the pH and aerating the water to promote the removal of ammonia. Following ammonia pretreatment, chemical coagulation and pH adjustment would be employed as pretreatment steps to facilitate the removal of suspended solids and certain dissolved contaminants such as metals and organic compounds. The pretreated water would then enter a settling tank, where the coagulated solids would be separated and removed as sludge. The sludge, which is not expected to be hazardous, would be collected in a holding tank and would disposed as required by the Limited Threat General Permit. It is anticipated that it will either be disposed of in the Landfill (if the Landfill's waste acceptance criteria are met) or hauled off-site (estimated 2 trucks per year) for appropriate disposal.

The clarified water from the settling tank would then flow through a media filtration system, which would further remove the remaining suspended solids. The filtered water would then pass through a granular activated carbon adsorption system to reduce organic contaminants and COD, then through metals polishing media. Next, an ion exchange system (not shown in Figure 3) would be employed to remove nitrate and nitrite from the water. The final treatment step would be an ultraviolet disinfection system, which would inactivate and remove *E. coli* and other bacteria that may be present in the water. Treatment chemicals used in the ATS would include coagulant, acid (hydrochloric acid) and caustic (likely sodium hydroxide) used to pretreat the influent CMU wastewater.

The treated water from the ATS ultraviolet disinfection system would then be conveyed to a new 20,000-gallon effluent break tank, monitored for water quality parameters (i.e., pH, turbidity, and oxygen-reduction potential) and then discharged to the North Sedimentation Basin (and ultimately to Pila Creek) via a new pipeline connecting the ATS to the existing CMU storm drain system. If permitted by the RWQCB, the treated water would be used for construction conditioning water and/or dust control as an alternative to discharging to Pila Creek.

Contingency for Storage of CMU Wastewater to Meet RWQCB Requirements

Recent correspondence with the RWQCB (RWQCB, July 23, 2024) also indicated that they require CMU wastewater storage contingency plans in the event that the ATS is not operational by the start of the 2024-2025 rainy season (or when the CMU Wastewater Storage Tank is full, which is approximately at 2.5 inches of cumulative rainfall), and in the event that the ATS "is not able to be used" thereafter. In response, the County is proposing to use one of two existing ridgeline tanks (Tank No. 2) on the west side of the Landfill property (470,000 gallons total storage) to temporarily augment CMU wastewater storage capacity (equivalent to an additional 3.8 inches of rain from the CMU). Tank No. 2 is currently used for storage of liquids from the Landfill's leachate collection and recovery system (i.e. recovered from the groundwater interceptor trench). Wastewater from the CMU would be transferred between the CMU Wastewater Storage Tank and Tank No. 2 through two new 4-inch aboveground fused HDPE pipes, using a new transfer pump, located along the same alignment as an existing 4-inch pipe (see Tank No. 2 location and pipeline to CMU Wastewater Storage Tank in Figure 1 and Figure 4 Block Flow Diagram). An additional contingency would be the continued use of Baker tanks to temporarily store CMU wastewater and dispose of the liquids either off-site by trucking or as make-up water in the ADF percolate system.

Impact Analysis

The following resource/issue areas and impacts identified in the SEIR and Addendum were reviewed to determine if any changes to impacts or impact levels would result from the proposed PD Change No. 7.

1. Visual Resources/Aesthetics

Proposed Project Description Change 7 would result in the addition of new aboveground facilities consisting of tanks, pipelines, pumps and other supporting equipment. The visibility of these facilities from the viewpoints analyzed 12EIR-00000-00002 is described below. An example of an ATS at a different facility is shown in Figure 5 for reference. The ATS would occupy an area of approximately 6,000 square feet and would be located adjacent to the existing CMU wastewater storage tank and well water storage tank. For the same reasons described in 12EIR-0000-00002 for the ReSource Center facilities, the ATS facilities would also not be visible from the Arroyo Quemada community (View 1), U.S. Highway 101 west of the access road (View 3), U.S. Highway 101 east of the access road east of Baron Ranch (View 4), off shore (View 5) and U.S. 101 south of the Landfill (View 6). Other views are discussed below.

Public Views (SEIR and Addendum - Impact TRRP VIS-1: Views 2, 7 and 8 - Class III).

View 2: Landfill Access Road Entrance. The proposed ATS and related CMU wastewater storage and transfer components associated with PD Change No. 7 would primarily be located north of the existing CMU deck and would not be visible from View 2 due to intervening topography, vegetation, and waste fill slopes or would be integrated within the existing Landfill/ReSource Center facilities. Therefore, implementation of proposed PD Change No. 7 would not result in a change in ReSource Center aesthetics impacts at View 2.

View 7: Baron Ranch Trail. As a part of the August 2017 addendum, the CMU Stormwater Storage Tank (now referred to as the CMU Wastewater Storage Tank was moved from a pad elevation of 630 feet to an elevation of 690 feet eliminating its visibility from the Baron Ranch Trail. The proposed ATS would be located on the west side of the storage tank and lower in height than the storage tank. Therefore, the proposed ATS and related CMU wastewater storage and transfer components associated with it would also not be visible from View 7 on the upper portion of this trail, or from the lower portion of this trail due to intervening topography. Therefore, implementation of proposed PD Change No. 7 would not result in a change in ReSource Center aesthetics impacts at View 7.

View 8: Upper Outlaw Trail. The proposed ATS would be visible from View 8 but would be approximately 3,800 feet away and in the foreground of and lower in height than the 42-foot-high, CMU Wastewater Storage Tank and the existing well water storage tanks. The proposed ATS would not block views to the ocean and would be an insubstantial element of the view relative to the landscape which has already and would continue to appear as a man-altered landscape during Landfill operation and after closure. Therefore, implementation of proposed PD Change No. 7 would not result in a change in ReSource Center aesthetics impacts at View 8.

Overall, Impact TRRP VIS-1 would remain less than significant (Class III).

View from U.S. Highway 101 (SEIR and Addendum – Impact TRRP VIS-2: Class II).

The proposed ATS and associated components would not be visible from U.S Highway 101. Therefore, implementation of proposed PD Change No. 7 would not result in a change in Impact TRRP VIS-2 which would remain significant but mitigable (Class II).

The following mitigation measures from the SEIR would continue to apply to the revised project:

MM TRRP VIS-1a: Building Exterior Color.

MM TRRP VIS-1b: Landscape Screening.

2. Air Quality/Greenhouse Gas Emissions

Operational Air Pollutant Emissions (SEIR and Addendum - Impact TRRP AQ-2: Class III).

The ATS facility would be electrically operated and would not generate new emissions. The emergency generator(s) (if installed) would generate air pollutant emissions in the event of a power outage at the Landfill. The anticipated period of operation would be limited to emergency conditions where electrical power from the grid is not available to the Landfill due to upset conditions and it is necessary for public health and safety and environmental safety to continue operation of the facilities. The specific design parameters of the emergency generator are not known at this time and it is possible that existing approved emergency generators may be available for use.

In addition, there would be new truck trips used to transport treatment chemicals to the Landfill, transport ATS sludge off-site and potentially truck CMU wastewater off-site if on-site treatment and/or storage capacity is exceeded. These trips would not be daily, but would periodically occur over the course of operating the facilities and would be limited in duration. It is assumed that the additional trips would be within the permitted traffic levels for the facility. Therefore, it is anticipated that ReSource Center air pollutant emissions with proposed PD Change No. 7 would remain below threshold levels and Impact TRRP AQ-2 would remain less than significant (Class III).

Normal Operations-Exceedances of Air Quality Standards (SEIR and Addendum - Impact TRRP AQ-3: Class III, Impact TRRP AQ-11: Class I).

Air pollutant emissions increases associated with proposed PD Change No. 7 would be negligible and partially occur off-site (motor vehicle emissions) and not substantially increase the most recent modeled ambient concentrations of air pollutants associated with ReSource Center operations (see AECOM 2023, prepared for PD Change No. 5). ReSource Center operations as modified by proposed PD Change No. 7 would not result in exceedances of air quality standards and Impact TRRP AQ-3 would remain less than significant (Class III).

Exceedances of the PM_{10} 24-hour California Ambient Air Quality Standard associated with the ReSource Center-related extension of Landfill life (Impact TRRP AQ-11) would not be affected by proposed PD Change No.7 and remain significant and unavoidable (Class I).

Human Health Risk (SEIR and Addendum - Impact TRRP AQ-5: Class III).

Toxic air contaminant emissions increases associated with proposed PD Change No. 7 would be negligible and partially occur off-site (motor vehicle emissions) and not substantially increase existing human health risk as identified in the most recent health risk assessment conducted for ReSource Center operations (see AECOM 2023, prepared for PD Change No. 5). ReSource Center operations as modified by proposed PD Change No. 7 would not result in exceedances of Santa Barbara County Air Pollution Control District health risk thresholds and Impact TRRP AQ-5 would remain less than significant (Class III).

Greenhouse Gas Emissions (SEIR and Addendum - Impact TRRP AQ-7 and Impact TRRP AQ-8: Class IV).

ReSource Center operations as modified by proposed PD Change No. 7 would result in a negligible increase in GHG emissions (small increase in electrical demand associated with new pumps and air compressor, motor vehicle emissions). The overall beneficial reduction in future GHG emissions (reduced Landfill methane emissions from recovery of organic waste) associated with implementation of the ReSource Center would not be affected and Impact TRRP AQ-7 and Impact TRRP AQ-8 would remain beneficial (Class IV).

3. Biological Resources

New facilities associated with the ATS would be located in existing disturbed and/or developed areas of the Landfill property within the permitted operational area. Therefore, no impacts to native or sensitive habitats or nesting birds are expected. Stormwater from the CMU (which the RWQCB considers to be wastewater), which currently overflows into the North Sedimentation Basin and ultimately Pila Creek and the Pacific Ocean, would be treated to improve quality and to meet the water quality standards of the Limited Threat General Permit reducing potential biological impacts.

Operational Impacts on Common Wildlife Species: Impact TRRP BIO-11 (Class III).

The small increase in motor vehicle trips on Landfill access roads associated with proposed PD Change No. 7 would be limited to the daytime and would not increase mortality of common, nocturnally active, wildlife species due to vehicle collisions. Therefore, Impact TRRP BIO-11 would remain less than significant (Class III).

Operational Impacts on Transient California Red-legged Frogs: Impact TRRP BIO-12 (Class II).

The small increase in motor vehicle trips on Landfill access roads associated with proposed PD Change No. 7 would be limited to the daytime and would not increase potential mortality of California red-legged frog that may be present while making overland dispersal movements that typically occur at night and during the rainy season. Therefore, Impact TRRP BIO-12 would remain significant but mitigable (Class II).

MM TRRP BIO-6: Avoidance and Minimization Measures for California Red-legged Frog and Sensitive Mammal Species would continue to apply to the revised project.

4. Hazards and Hazardous Materials

Use or Storage of Hazardous Materials: Impact TRRP HAZ-2 (Class III).

Hydrochloric acid, sodium hydroxide, sodium hypochlorite and a coagulant (ferric based) will be utilized as part of the ATS. The chemicals would be stored at the ATS site in chemical-resistant high-density polyethylene totes (see Figure 3) or ready to use double containment drums depending on the amount required. Double containment drums or full totes would be delivered by truck, such that potential spillage from filling totes would be avoided. The use and storage of these chemicals would be included in, and managed in compliance with, the existing Hazardous Materials Release Response Plans and Inventory (Business Plan) and Spill Prevention, Control, and Countermeasure Plans prepared for the Landfill and

ReSource Center. ReSource Center operations as modified by proposed PD Change No. 7 would not substantially increase potential hazardous materials impacts to the public or environment and Impact TRRP HAZ-2 would remain less than significant (Class III)

5. Geologic Processes

Slope Stability/Landslides: Impact TRRP G-1 (Class II).

Based on a brief review by Geosyntec of the available information for the existing tank and slope configurations as described in the Addendum Geotechnical Report (Earth Systems, 2017), the added load of approximately 1,000 tons distributed over the approximate area of 5,000 sf with appropriate set back from the edge of the existing slope, is not expected to negatively impact the slope stability of the proposed ATS area. A revised project-specific geotechnical letter report and stability analysis will be performed during the design phase of the project to confirm and document the expected performance of the existing slope. Therefore, Impact TRRP G-1 would remain significant but mitigable (Class II).

6. Noise

Operational Noise Impacts on Noise-Sensitive Land Uses: Impact TRRP N-3 (Class III).

Increased ReSource Center operational noise associated with proposed PD Change No. 7 would be limited to the emergency generator (if installed) and pumps (new CMU wastewater transfer pumps, ATS pumps and air compressor). The ATS pumps and air compressor would be located within the ATS containers such that noise generated by these components would be attenuated by the container walls. Any noise increase associated with ReSource Center operations would not be detectable at noise-sensitive land uses and less than the significance threshold. Therefore, TRRP Impact N-3 would remain less than significant (Class III).

7. Transportation/Circulation

Operational Impact on U.S. Highway 101 Operations: Impact TRRP T-2 (Class III); Operational Impact on Level of Service at the U.S. Highway 101/Landfill Access Road Intersection: Impact TRRP T-3 (Class III); Operational Safety Impacts at the U.S. Highway 101/Landfill Access Road Intersection: Impact TRRP T-4 (Class III).

Implementation of proposed PD Change No. 7 would result in additional trips to periodically deliver chemicals needed in the ATS, remove sludge from the ATS process if not suitable for disposal in the Landfill, and remove CMU wastewater in the event storage and treatment capacity onsite is exceeded. These trips would not be daily trips such as those that occur for municipal solid waste delivery and employees, but would occur as needed during operation of the ReSource Center. Overall, it is expected that these trips would be within the permitted traffic levels allowed under the existing Solid Waste Facility Permit (SWFP) 42-AA-0015 (184 trucks/day and 50 other vehicles/day). Peak vehicles per day in the first quarter of 2024 was 105 and 108 in the second quarter, well below the permitted volumes.

The Traffic Analysis conducted for PD Change No. 4 concluded that adequate gaps in traffic flow on U.S. Highway 101 are available, especially early in the morning such than no increase in operational safety impacts would occur. The small, infrequent and limited duration additional vehicle trips associated with PD Change No. 7 would not affect operational traffic safety and transportation/circulation impacts would remain less than significant (Class III).

8. Water Resources

Composting Management Unit Impact on Water Quality: Impact TRRP WR-9, (Class II.)

The EIR prepared for ReSource identified that, due to the absence of water quality data specifically for digestate/compost from anaerobically digested organic material from MSW, a potentially significant impact to water quality could result from the operation of the CMU. Therefore, Mitigation Measure MM TRRP WR-4 required water quality sampling and corrective actions to be implemented to protect water quality.

Since the preparation of the Subsequent EIR, the ReSource Center CMU has enrolled for coverage under the Compost Order. The Compost Order defines stormwater and leachate from composting operations as wastewater and does not permit discharges. Additionally, the Compost Order states the facility must be capable of conveying and containing, without overflow or overtopping, all runoff from the working surfaces from the 25-year, 24-hour design storm event (7.79 inches rainfall or 1.16 million gallons runoff). The combination of the CMU Wastewater Tank (380,000 gallons) and Tank 2 (470,000 gallons) can store 850,000 gallons which equates to approximately 5.7 inches of rainfall. The ATS will operate at 630 gpm which can treat up to about 900,000 gallons per day. Together, the tanks and ATS treatment rate provide sufficient capacity to prevent untreated wastewater discharge events for both the 25-year, 24-hour design storm event and for a 22.5-year historical rainfall period of record (2000-2024, excluding periods with incomplete data).

The ATS is proposed to provide a treatment quality that would allow the effluent to be discharged under the Limited Threat General Permit. Limited-threat discharges that may be authorized by the Limited Threat General Permit are considered by the RWQCB to be relatively pollutant-free discharges that pose little threat to water (Central Coast Regional Water Quality Control Board, December 2022). Limited-threat discharge is generally defined as a planned, short-term, and minimized-volume discharge from a definable project that results in a point source discharge to surface waters and that is managed in a manner that does not threaten the quality or beneficial uses of the receiving water. The Limited Threat General Permit also encourages beneficial reuse to augment existing water supplies.

The water quality of the treated effluent discharge from the ATS will not worsen water quality impacts compared to the untreated overflows that previously occurred from the CMU. The Limited Threat General Permit defines effluent limits that serve both as screening criteria to determine eligibility for permit coverage and as effluent limits. The proposed ATS discharges will be subject to effluent limits for “Inland Surface Waters, Enclosed Bays, and Estuaries” as defined in Attachment D of the Limited Threat General Permit. These limits are based on the Water Quality Control Plan for the Central Coastal Basin and, where applicable, the drinking water primary MCL. Effluent water quality is expected to be in compliance with the effluent limits defined in the Limited Threat General Permit

since the ATS is being designed and tested for that purpose. Effluent results will be collected and reported during start-up monitoring after the ATS has been constructed and before the effluent is discharged to Pila Creek. Therefore, installation of the ATS is expected to reduce water quality impacts as required by MM TRRP WR-4 and Impact TRRP WR-9 would remain a Class II impact.

9. Other CEQA Issues

Proposed PD Change No.7 is an operational change at the approved and constructed CMU (addition of an ATS and associated infrastructure) in previously disturbed or developed areas to treat CMU wastewater pursuant to RWQCB requirements. Therefore, there would be no changes in the impact analyses for the following issue areas: cultural resources, land use, public health/nuisance, environmental justice or cumulative impacts.

CEQA Determination

It is the finding of the Planning and Development Department that the previous environmental documents Final SEIR (12EIR-00000-00002, SCH #2012041068), the SEIR Revision Letter and Errata dated May 27, 2016, SEIR Addendum dated August 11, 2017 (revised October 26, 2017), and 15162 determinations dated January 15, 2020, May 18, 2020, August 2, 2021 and May 16, 2024 and CEQA Section 15164 Addendum dated August 15, 2023 amended by this CEQA Section 15164 Addendum, may be used to fulfill the environmental review requirements of the ReSource Center ATS Project (Project Description Change No. 7). No impacts previously found to be insignificant are now significant. Taken together, the original environmental document and this Addendum fulfill the environmental review requirements of the current project. As the current project meets the conditions for the application of the State CEQA Guidelines Section 15164, preparation of a new EIR or ND is not necessary.

Environmental Hearing Officer:

Errin Briggs, Deputy Director
Santa Barbara County Planning and Development

Signature: Signed by: Errin Briggs D3053E2C49A34C6... Date: 8/20/2024 | 11:23 AM PDT

References (all referenced documents are available for review at RRWMD)

AECOM Environment. 2023. Revised Air Quality Technical Memorandum for ATC 14500 10 Application, Tajiguas ReSource Center, Santa Barbara County, California. Prepared for Mustang Energy Ventures.

Central Coast Regional Water Quality Control Board. July 23, 2024. Email from Jordan Haserot to Christina Wilder. Subject: Re: Tajiguas CMU Technical Report.

Central Coast Regional Water Quality Control Board. June 19, 2024. Enforcement Program: Tajiguas Compost Management Unit, Santa Barbara County – Notice of Violation and Notification of Necessary Revisions to The Water and Wastewater Management Plan.

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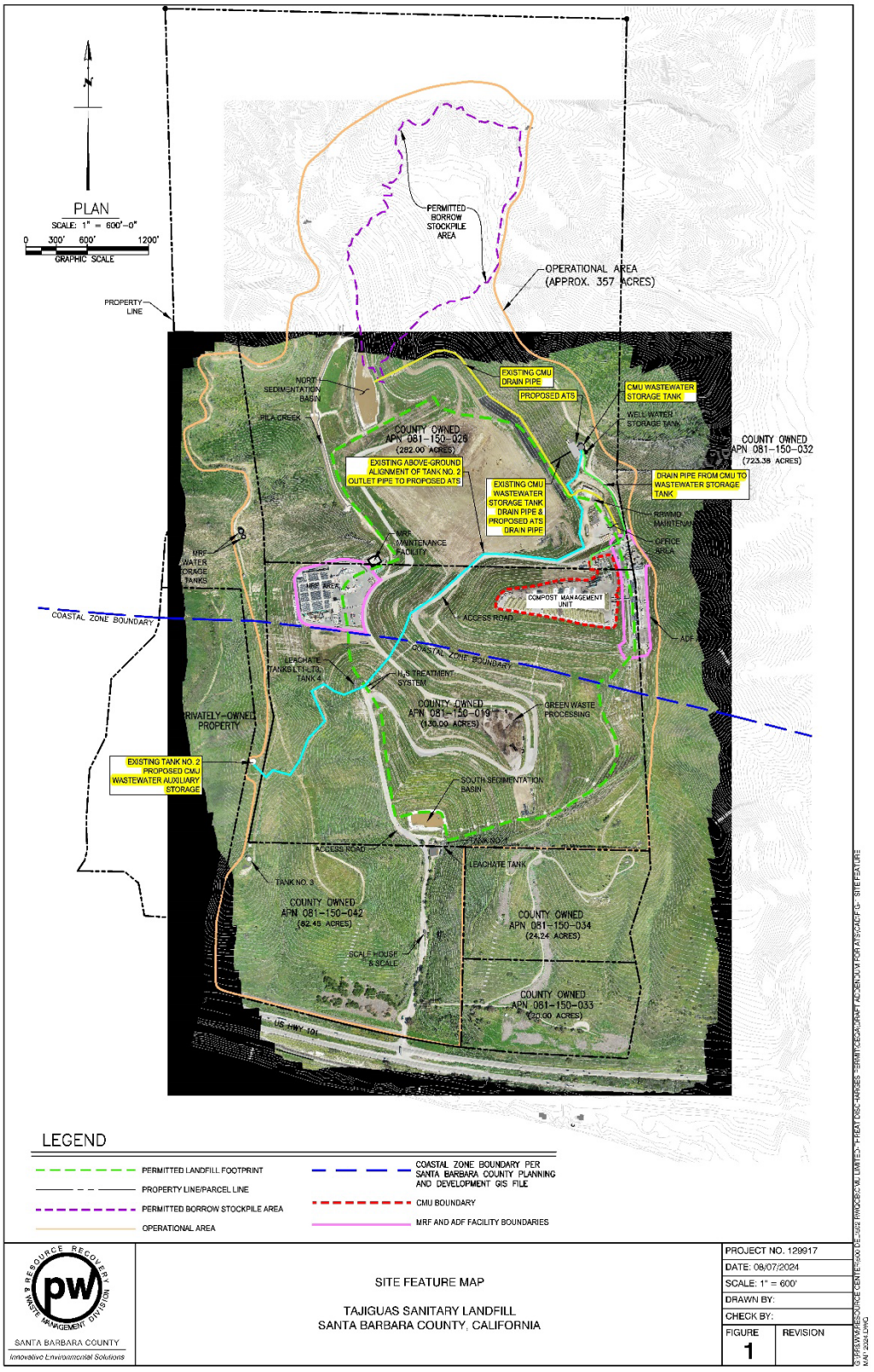

Figure 1. Site Feature Map (Project facilities highlighted in yellow)

Figure 2. CMU/ATS Site Map

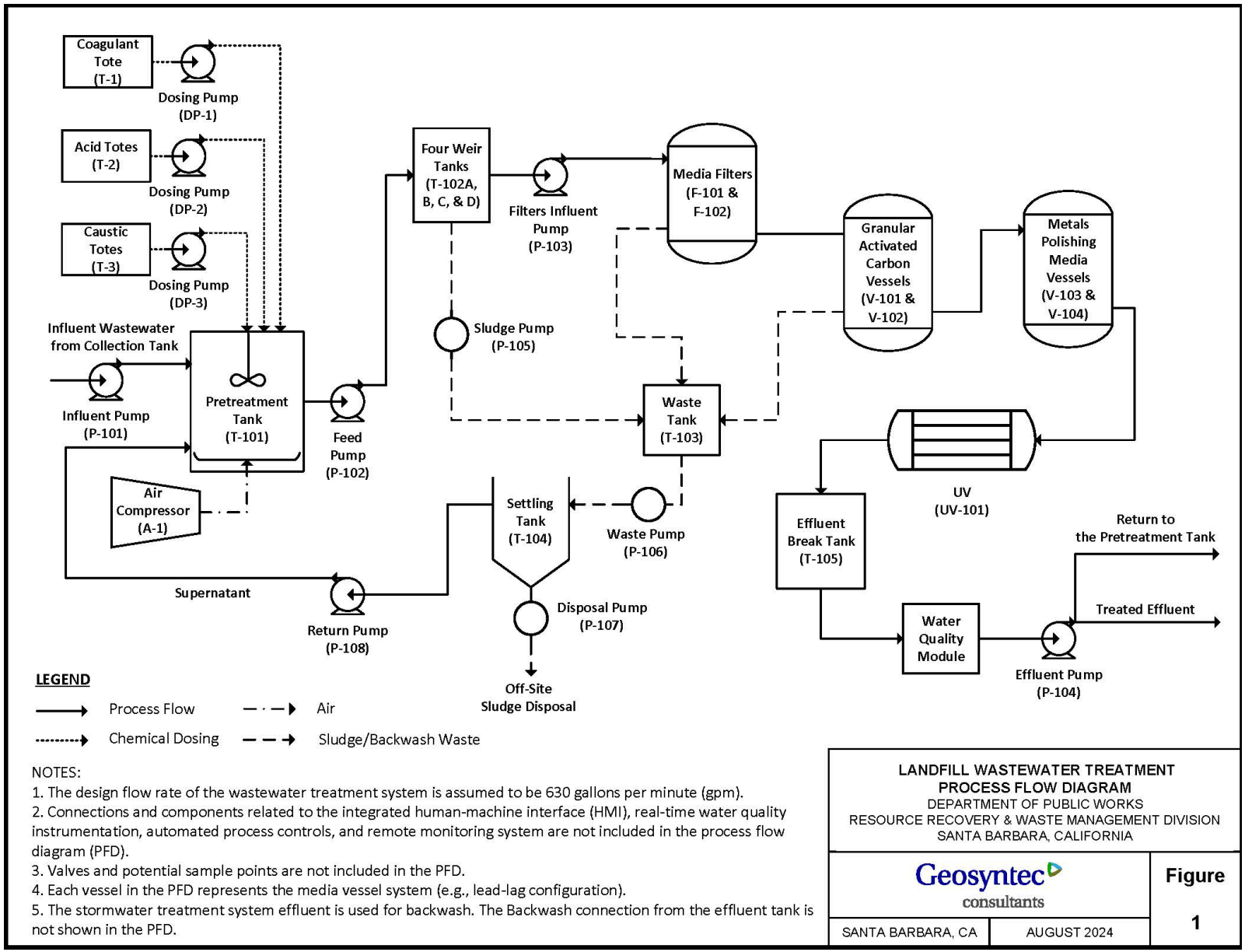

Figure 3. ATS Process Flow Diagram

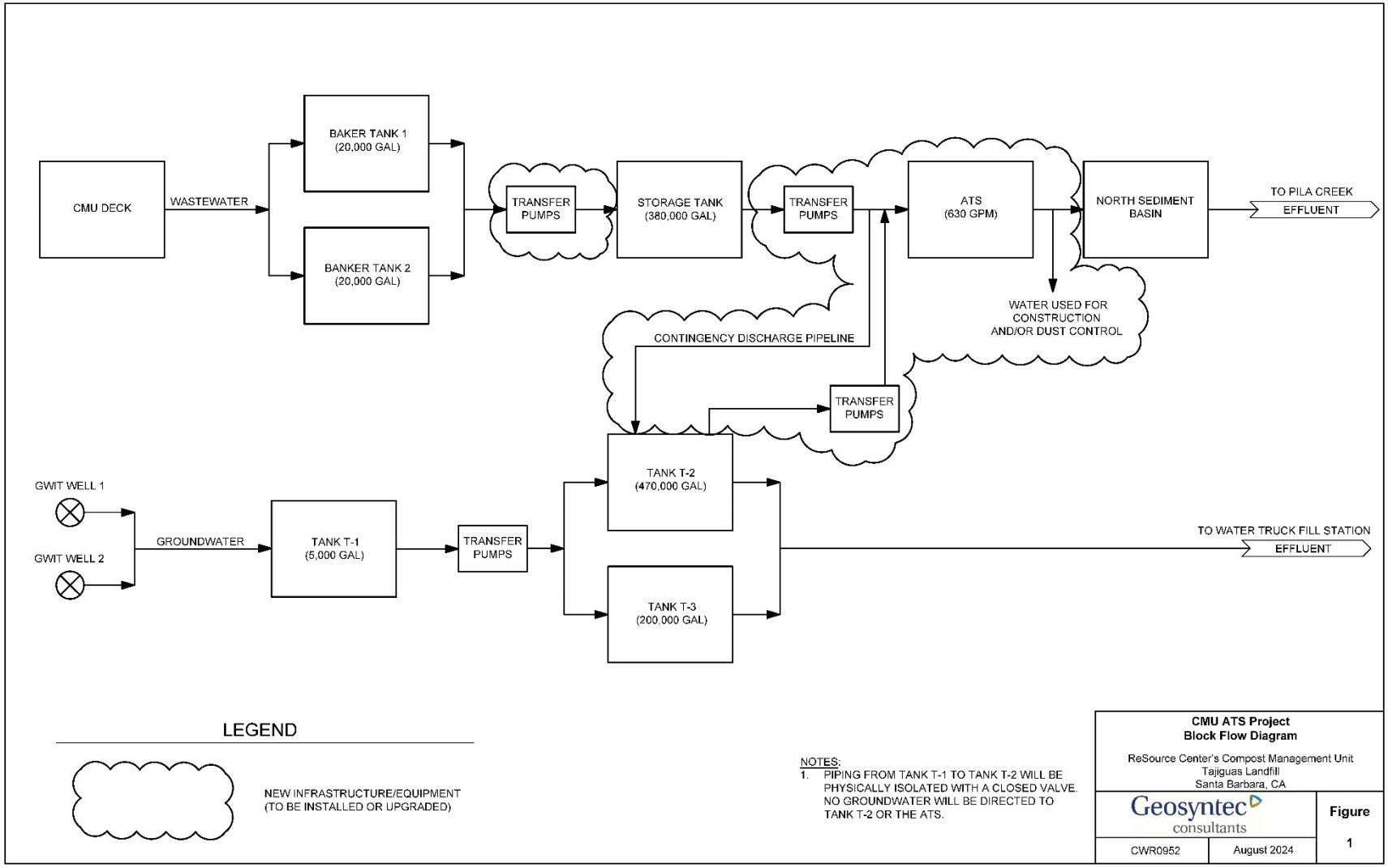

Figure 4. CMU ATS Block Flow Diagram

Figure 5. Photos of Example ATS