

Countywide Services Agency

Environmental Management  
Department

Environmental Compliance Division

Elise Rothschild, Chief



## County of Sacramento

Bradley J. Hudson, County Executive  
Ann Edwards, Chief Deputy County Executive  
Val F. Siebal, Department Director

August 31, 2012

Dana Allen  
City of Sacramento Community Development Department  
Environmental Planning Services  
300 Richards Blvd. 3<sup>rd</sup> Floor  
Sacramento, CA 95811

Dear Ms. Allen:

**SUBJECT: REVIEW OF THE ASPEN 1- NEW BRIGHTON PROJECT DRAFT  
ENVIRONMENTAL IMPACT REPORT**

The Sacramento County Environmental Management Department (EMD) has reviewed the Draft Environmental Impact Report (DEIR) for the Aspen 1 – New Brighton Project. EMD acts as the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling, and Recovery (CalRecycle) in Sacramento County. As such, EMD has authority and responsibility for regulatory oversight of solid waste handling and disposal sites in the city and county of Sacramento. As you know, this project would border both L and D Landfill which lies directly to the south and Florin Perkins Landfill which lies directly to the west of the project.

L and D Landfill is an active landfill that receives mostly non-putrescible wastes. The facility does, however, also receive and bury processed green waste which it uses as alternative daily cover. This material has the potential to create odors as well as produce methane and other landfill gases as it decomposes, as may other non-inert wastes buried at the landfill. This facility does produce landfill gases which are currently controlled by a landfill gas extraction system. Collected gases are burned in an enclosed, on-site flare. There is currently no backup generator system in place to power the gas extraction system, in the event of an extended power failure. Landfill gases are flammable and potentially explosive. There is the potential for landfill gas migration at any time the extraction system is off line.

Florin Perkins Landfill is a closed landfill that received mostly non-putrescible construction and demolition wastes. Like L and D, however, this site also received and buried green waste and other non-inert wastes so it produces landfill gases. While it is difficult to predict how long landfills may continue to generate methane and other landfill gases, there are landfills in the county that are still generating gases fifty years after the last waste was buried. Florin Perkins Landfill is currently under an LEA order to develop a Landfill Gas Monitoring and Control Plan. There is currently no landfill gas control system in place.

There is also an active, permitted transfer station on the site that is permitted to process up to 500 tons of non-putrescible wastes per day.

The LEA provides the following comments regarding the proximity of the project to the two solid waste facilities:

- 1) The DEIR cites the two landfills as two of the four potential odor sources in the vicinity and states that there will be a significant and unavoidable impact as a result of the four odor sources. Although odors are not typically an issue at either landfill, the LEA agrees with this assessment but would like to add that while the DEIR states that no odor complaints were received for the two landfills during the last three years of the timeframe examined, several odor complaints were received during April and May of 2012. Upon investigation, the LEA determined that the odors originated at the Elder Creek Recovery and Transfer station located at 8642 Elder Creek Road, but it appears that the odors may have been exacerbated by transfer of the offending material – decomposing green waste – to L and D Landfill for use as Alternative Daily Cover. It should be noted that some of the complainants were residents of the apartment complex located at the northeast corner of Jackson Road and South Watt Avenue, just across Watt Avenue from the proposed project. This project would add new receptors in even closer proximity to the landfills. The LEA recommends that at a minimum, potential home buyers be notified in writing of the possibility of odors from the landfills and transfer station.
- 2) Noise and vibration from the two landfills and transfer station are considered in the DEIR. The Executive Summary concludes that even with implementation of mitigation measures, impacts related to existing noise sources within the project area would remain significant and unavoidable. The LEA concurs with this and would point out that periodic problems associated with dust and litter from the landfills may also be likely. It should be noted that 14 CCR 17867(a)(2) requires facilities to minimize nuisances, such as odors, dust, noise, and vectors but there is no requirement to reduce the potential for odors or nuisances to zero. The LEA recommends that at a minimum, potential home buyers be notified of the potential for noise, vibration, dust, and litter from the landfills and transfer station.
- 3) As stated, both landfills produce landfill gases. It should be noted that wastes that produce these gases are buried in areas that directly abut the project's south and west boundaries. Currently, both landfills monitor for migrating gases with monitoring probes located near the edges of their respective properties. In both cases, the probes were installed along property perimeters with maximum 1000' spacings, as required by 27 CCR 20925(b)(1). This maximum spacing reflects the current absence of receptors in the proposed project's location. If the project

is developed, monitoring well spacing will likely have to be reduced, as required by 27 CCR 20925(b)(3), which requires that monitoring well spacing be reduced as necessary to protect persons and structures threatened by landfill gas migration, resulting in added costs to the landfill operators. Also, continuous gas monitoring of any structure located within 1000' of waste is advised. The LEA recommends that no structures be built within 1000' of waste. If structures associated with this project are to be built within 1000' of waste, the LEA recommends that they be built in a manner that would reduce the likelihood of gas accumulation in the structure such as with a foundation membrane layer. Notification of potential home buyers of the possibility of gas migration and the associated dangers, and continuous gas monitoring of the structures should also be considered.

Sincerely,



John Lewis  
Environmental Specialist III  
County of Sacramento  
Environmental Management Department  
Solid Waste Program

JL:jm

c: Nevin Yeates, CalRecycle