

July 18, 2017

Mr. Andy Popper, Associate Planner
Glenn County Planning & Public Works Agency
777 North Colusa Street
Willows, California 95988

Subject: Conditional Use Permit 2017-001
California Olive Ranch Composting Facility
“AP-80” Zoning District

Dear Mr. Popper:

In reviewing the documentation you provided we didn't find any specific thresholds for odor. Also, how can the mitigated Negative Declaration say that there will be a less than significant impact caused by odor when the documentation doesn't place any verifiable or measurable thresholds or criteria for determining significance of the odors coming from the proposed project? The increase in odors affecting the surrounding households, properties, and farm workers in the area have a very real potential to be extremely significant. Currently it is wonderful to go outside to get a breath of fresh air, with the proposed project that will likely not be the case in the future based on the current documentation.

- Are there established thresholds that once exceeded require specific actions? Distance odor has traveled, intensity of odor, number/days of odor exceedances? If not there should be prior to approval and those thresholds should be made public through this process.
- If those actions don't reduce the odors below the established thresholds are there additional enforcement actions that are required? If so, those should be made public through this process.
- The documentation and Odor Impact Management Plan just appear to mention “Possible Management Techniques” that may be employed if there is a complaint. We didn't find any mandatory actions or techniques that are required should the complaint be filed and verified.
- The only mandatory mitigation was the watering of driveways and loading areas. Ag typically causes dust, however crops and grazing, which are the historical uses of the land in the area don't typically cause “stinky, sulfurous, or fishy” odors that last for long periods of time.
- The project has a very real potential to effect the quality of life of me and my family. It could also have a significant impact on our property value.
- The Wind Rose used in the documentation is from CIMIS station near Colusa. This could be significantly different from that along the foothills in Artois. The data used only looked at the years 1993 to 1997. Why wasn't more recent data and/or that from a longer period used? Why would one only use data from a 5 year period ending 20 years ago, from a CIMIS station located in the valley near Colusa, nearly 30 miles away from a

project located at the base of the foothills in Artois. This could significantly affect the area impacted by the project.

2.2 Method of Assessing Odor Impacts

If questionable or objectionable onsite odors are detected by site personnel, the following protocol will be implemented:

- 1. Investigate and determine the likely source of the odor.*
- 2. Assess the effectiveness of available onsite management practices to resolve the odor event and immediately take steps to reduce the odor-generating capacity of the onsite material. Possible management practices are shown in Table 2.*
- 3. Determine if the odor traveled offsite by surveying the site perimeter and noting existing wind patterns.*
- 4. If it is determined possible odor impacts occurred, contact appropriate enforcement agency and/or neighboring residences.*
- 5. Record the event for further operational review in an odor log.*

In the above method of assessing odors the only real action is that if site personnel detect objectionable odors (*what about neighbors*) steps will be taken immediately to reduce odors. That sounds good, but to what levels will the odors be reduced? What if the odors can't be reduced? The necessary steps, thresholds, and requirements should be placed in the conditional use permit.

Section 4.0 of the OIMP

In the event that an odor complaint is received, the following procedures will be followed by COR personnel:

- 1. If possible, the operator will visit the location of the complaint to verify if the site may be responsible for the odor. Otherwise, the operator shall investigate the probable source of the odor complaint and implement operational changes to minimize odors.*
- 2. Discuss investigation and response with complainant.*
- 3. Inform Local Enforcement Agency (LEA) of complaint and response.*
- 4. Document the complaint(s) on the odor investigation report form (copy included as Appendix A).*

The complaint Response protocol is insufficient. It states "If possible the operator will visit the location". To state "If possible" in the complaint response protocol is problematic. If they will be operating a facility that can cause objectionable odors, as stated in the application, someone must at least be available to address an odor complaint. The complaint Response protocol goes on to say the operator will implement operational changes to minimize odors. I ask minimize to what extent? Again the documentation needs to contain verifiable thresholds and enforcement actions to eliminate the detrimental effects the odors may cause to the surrounding households, properties, and farm workers.

Another concern in the documentation is that it states that when Cal Olive is not using the facility they may allow others (CSI) to use it for producing high quality compost. **CSI** is the

acronym used in the Project Summary, although nothing else in the documentation mentions who they are, what they use to produce compost, the volume of feedstock that will be imported to produce compost.

- This seems to be opening the site to become a commercial compost facility rather than a way for Cal Olive to compost their own olive pomace. Has the planning commission considered this and have restrictions been put in the permit to ensure this does not happen?
- By others using the facility when Cal Olive is not will dramatically increase the potential of the surrounding households and properties being significantly affected by the proposed project.
- In the Odor Control section of the Project Narrative it states the only feedstock that will be used that has an obvious odor is the olive pomace. However, without knowing what others users of the facility may use as feedstock that statement could be false.
- A commercial compost facility that is rented or leased out to others doesn't appear to be consistent with the current Zoning of AP-80 "Intensive Agriculture"? This appears to be a separate and distinct enterprise from Cal Olive's current farming operation.
- The truck traffic mentioned in the documentation anticipated a reduction of traffic since the pomace won't be trucked away from the site. However, I didn't see any study or mention of the additional traffic caused by allowing others to use the facility to produce compost. County Road 35 in this area is in very bad condition and the bridge next to Cal Olive's driveway is hazardous with the all traffic going in and out of their current facility. Multiple members of my family and myself have had near misses with vehicles entering and leaving the Cal Olive facility.

One of the best things about where I live is going outside at night with the kids to enjoy the peace and quiet while viewing the stars with virtually no other lights or noise. Typical agriculture work done in the area creates very little if any lighting at night aside from infrequent tractor lights and/or pickup lights. Are there restrictions on the lighting and intensity that can be used for this project? Operating a compost facility 24/7 from September through December as stated in the CalRecycle letter to Andy Popper, dated April 19, 2017, will likely require a significant amount of lights. This needs to be addressed to avoid affecting neighbors and children that will be sleeping and enjoying the quiet and dark nights that makes the area such a great place to live and raise a family.

The idea that the farm next door is going to begin composting their waste is not pleasant for any neighbor. However, the idea of a commercial composting facility is completely objectionable. If Cal Olive can ensure the surrounding households and properties will not be affected by odors, lights, and noise from this project then we do not object. However, if the site will be rented or leased and used by others as a commercial composting facility, then we strongly object of the project.

There needs to be language in the Conditional Use Permit that mandates actions or techniques and enforcement actions that are required should the odors created exceed verifiable thresholds. There should be odor measurement and sampling performed continually to ensure the odors are

not affecting the surrounding households and properties. If the odors, lights, and noises produced from the project cannot be managed in a way to not affect the surrounding households, properties, and farmworkers, then the Conditional Use Permit should not be issued and/or revoked.

I ask that the Planning Commission place verifiable and measurable limits in the Conditional Use to ensure, noise, light, and odor nuisances do not affect the surrounding households and properties.

Sincerely,

Jake and Tara Berens

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

July 18, 2017

Mr. Andy Popper, Associate Planner
Glenn County Planning & Public Works Agency
777 North Colusa Street
Willows, California 95988

Subject: State Clearinghouse No. 2017032061 – Mitigated Negative Declaration (MND) for a Conditional Use Permit for the proposed California Olive Ranch Composting (CORC) facility requiring the issuance of a Solid Waste Facilities Permit (SWFP), Glenn County.

Dear Mr. Popper:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to review and comment on the project proposal cited above. The MND included the exact same Initial Study and Environmental Checklist that was provided to CalRecycle staff for review in the April 2017, Notice of Early Consultation for which comments were provided in a letter dated April 19, 2017, to your agency. CalRecycle staff have no further comments on the MND, Initial Study, and Environmental Checklist, as proposed at this time.

CalRecycle staff have also reviewed the Report of Composting Site Information (RCSI), referred to as a Report of Composting Facility Information dated February 2017, and Odor Impact Minimization Plan that were included together with the MND. Please note to the operator of the CORC that the RCSI is required to include the method for storage and final disposal of nonrecoverable or nonmarketable residues with the document. These requirements can be found in Title 14, California Code of Regulations, Section 18227.

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the MND. If you have any questions or comments, please contact me at 916.341.6327 or by e-mail at John.Loane@CalRecycle.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "John Loane".

John Loane, Environmental Scientist
Permitting and Assistance Branch
Waste Permitting, Compliance, and Mitigation Division

cc: John Wells, LEA - JWells@countyofglenn.net

California Olive Ranch

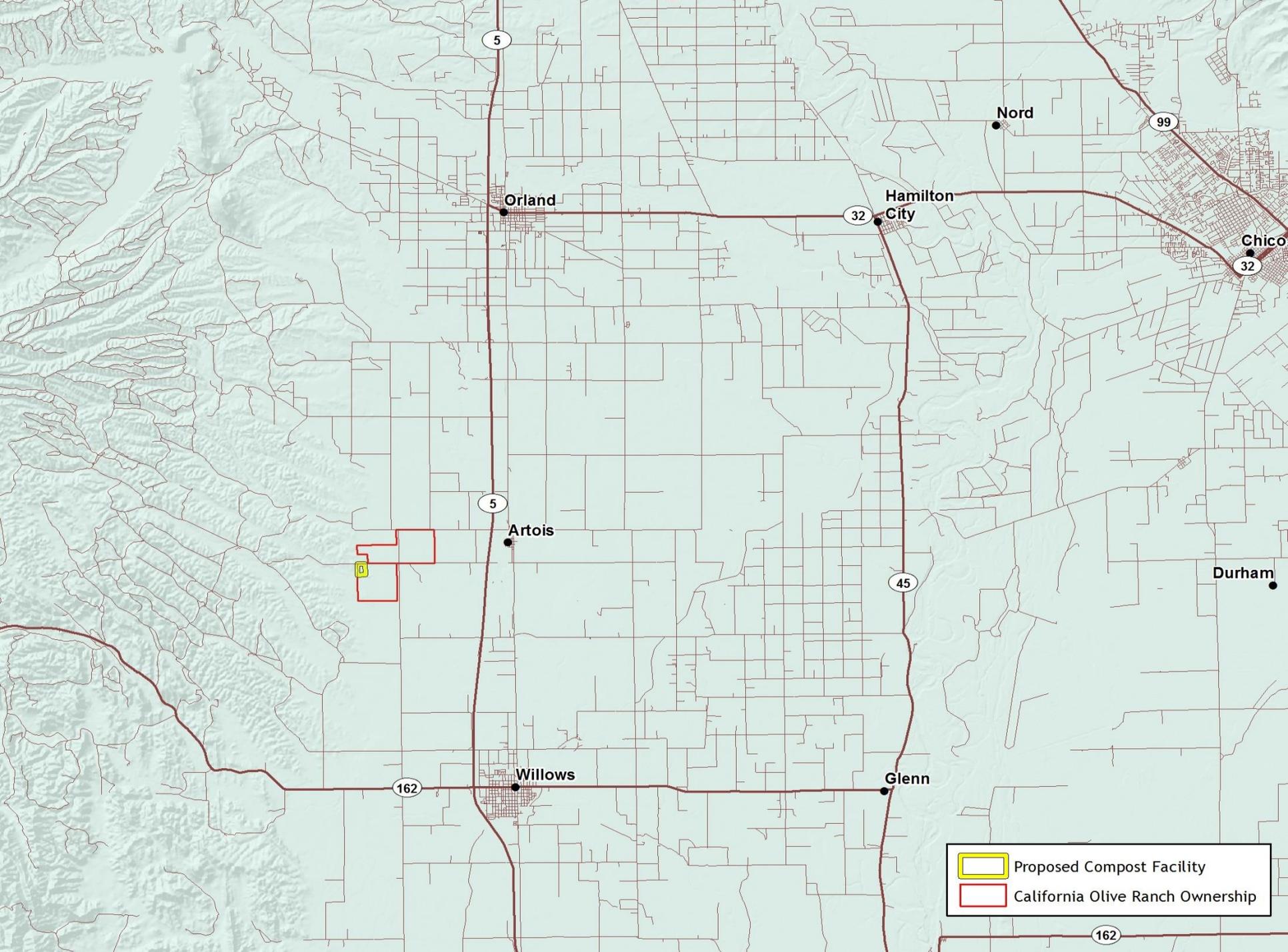


Proposed Composting Facility

Project Location



- ❧ Located approximately 3.5 miles west of Artois
- ❧ The proposed facility will encompass 30 acres of the current 90-acre parcel.
 - ❖ 24 acres for compost windrows
 - ❖ 4 acres for mixing area
 - ❖ 2 acres for setbacks and roadways



	Proposed Compost Facility
	California Olive Ranch Ownership

Project Summary



- ❧ California Olive Ranch (COR) farms approximately 5,500 acres of olives and processes olive oil at their bottling facility in Artois
- ❧ The oil pressing process produces between 40,000 to 70,000 tons of olive pomace (meat and skins) annually
- ❧ COR has applied for a Conditional Use Permit to develop a facility to compost the olive pomace at their Artois ranch

Current Operation



- ❧ The pomace is transported to the Wilbur-Ellis facility at the Orland Airport for use as a pet-food additive
- ❧ Between 1,700 to 3,900 truck trips are required to dispose of the pomace at the Wilbur-Ellis facility

Goals & Objectives



- ∞ The project has the following objectives:
 - ❖ To establish an efficient reuse of olive pomace
 - ❖ To increase solid waste diversion through the recycling of other agricultural waste material
 - ❖ To develop regenerative agricultural techniques for use on COR orchards
 - ❖ To reduce COR use of commercial fertilizers
- ∞ The organic material and water retention properties of compost can improve the agricultural productivity of soils.
- ∞ Long-term goal is to follow regenerative agricultural techniques and eliminate the need for commercial fertilizers and reduce water consumption on the olive orchards

Compost Trial

Project Goal



- ✧ Mix olive pomace waste with readily available low cost agricultural additives to produce a product that can be re-applied to agricultural property to increase productivity

Compost Trial

Key Additive Characteristics



- ❧ Bulking agent to enhance air flow/oxygen availability
- ❧ Nitrogen for bacterial growth
- ❧ Moisture content for bacteria growth, too little = slow decomposition, too much = anaerobic conditions and ODOR

Compost Trial

Additives Considered



- ❧ Mushroom compost
- ❧ Leaves and stems/wood fines
- ❧ Almond trash
- ❧ Manure
- ❧ Straw
- ❧ Rice hulls

Compost Trial Initial Mixtures



- ❧ Office spreadsheet calculations
- ❧ Submitted samples to laboratory for the following analyses:
 - ❖ Carbon
 - ❖ Nitrogen
 - ❖ Moisture content
 - ❖ Bulk density
- ❧ Based on the results, we identified several mixtures consisting of olive pomace, supplemental sources of nitrogen, and bulking agents. The volume of the additives was adjusted to achieve a target moisture content of approximately 50 percent and the target C/N ratio of approximately 35.

Compost Trial

Hand and Knees Test



- Based on the spread sheet calculations, readily available additives were obtained and mixed on the shop floor to simulate the spreadsheet mixtures. Several of the mixtures were modified based on sight and feel and all of the mixtures were ranked.

Compost Trial

Field Test



☞ The top four ranked mixtures were selected for a field test. These mixtures included the following:

Additives	Test Mix 1	Test Mix 2	Test Mix 3	Test Mix 4
Olive Pomace	50	43	43	50
Almond Trash	30	43	43	8
Rice Hulls	10	---	---	8
Straw/Hay	---	---	9	25
Manure	5	4	4	8
Leaves and Stems	5	--	---	---
Wood Fines	---	9	---	---
Percent by volume as delivered.				

☞ The number of field test was limited by permit conditions of <500 cyds total volume.

Compost Trial Final Test Results



⌘ Pending

PROPOSED VEGETATION
BUFFER 2 ROWS OF TREES

1488'

PRIVATE GRAVEL ROAD

FENCE

478'
ACCESS ROAD

PHASE 1
53,252 CYD
OF COMPOST
16 ACRES

30'

PHASE 2
20,442 CYD
OF COMPOST
5 ACRES

CONCRETE
PUSH WALL
AND WIND
SCREEN

410 +/-

PAVED
MIXING AREA
4 AC

ADDITIONAL
PHASE 2
10,221 CYD
OF COMPOST
2.5 ACRES

CONCRETE
PUSH WALL
AND WIND
SCREEN

392'

395 +/-

COUNTY ROAD 35

POND

30' ACCESS ROAD

100' WIDE PG&E EASEMENT FOR GAS PIPE LINE PER
BOOK 409, OFFICIAL RECORDS, AT PAGE 266

BIO SWALE

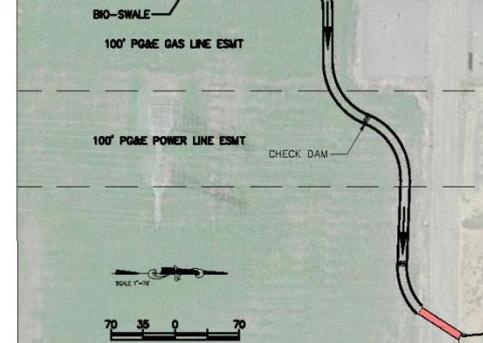
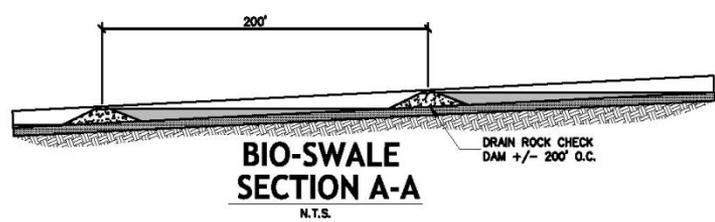
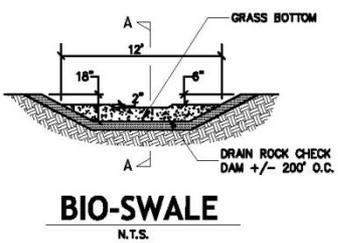
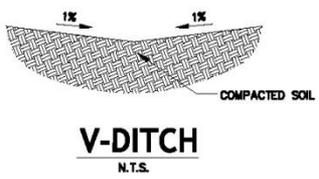
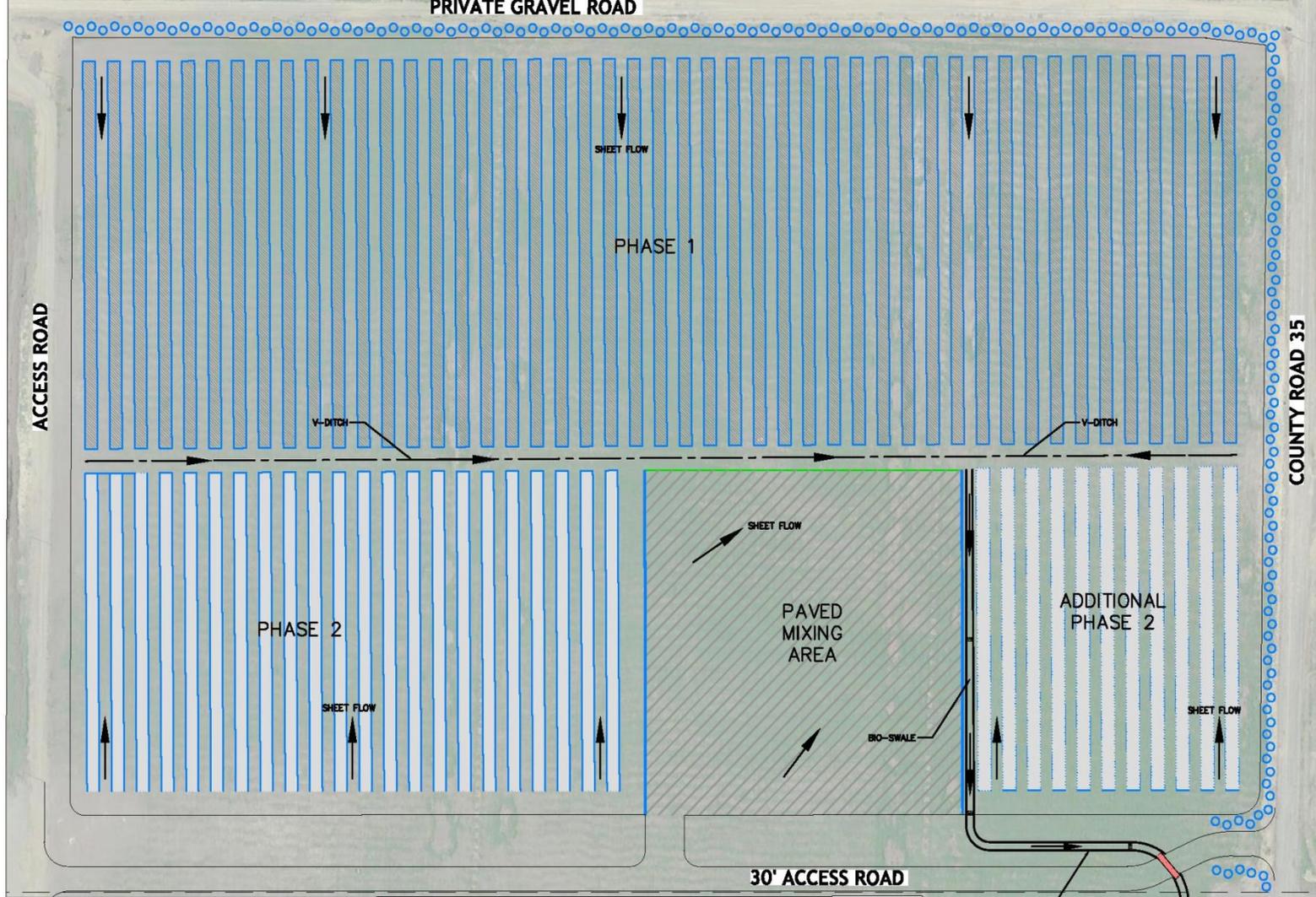
PG&E YARD

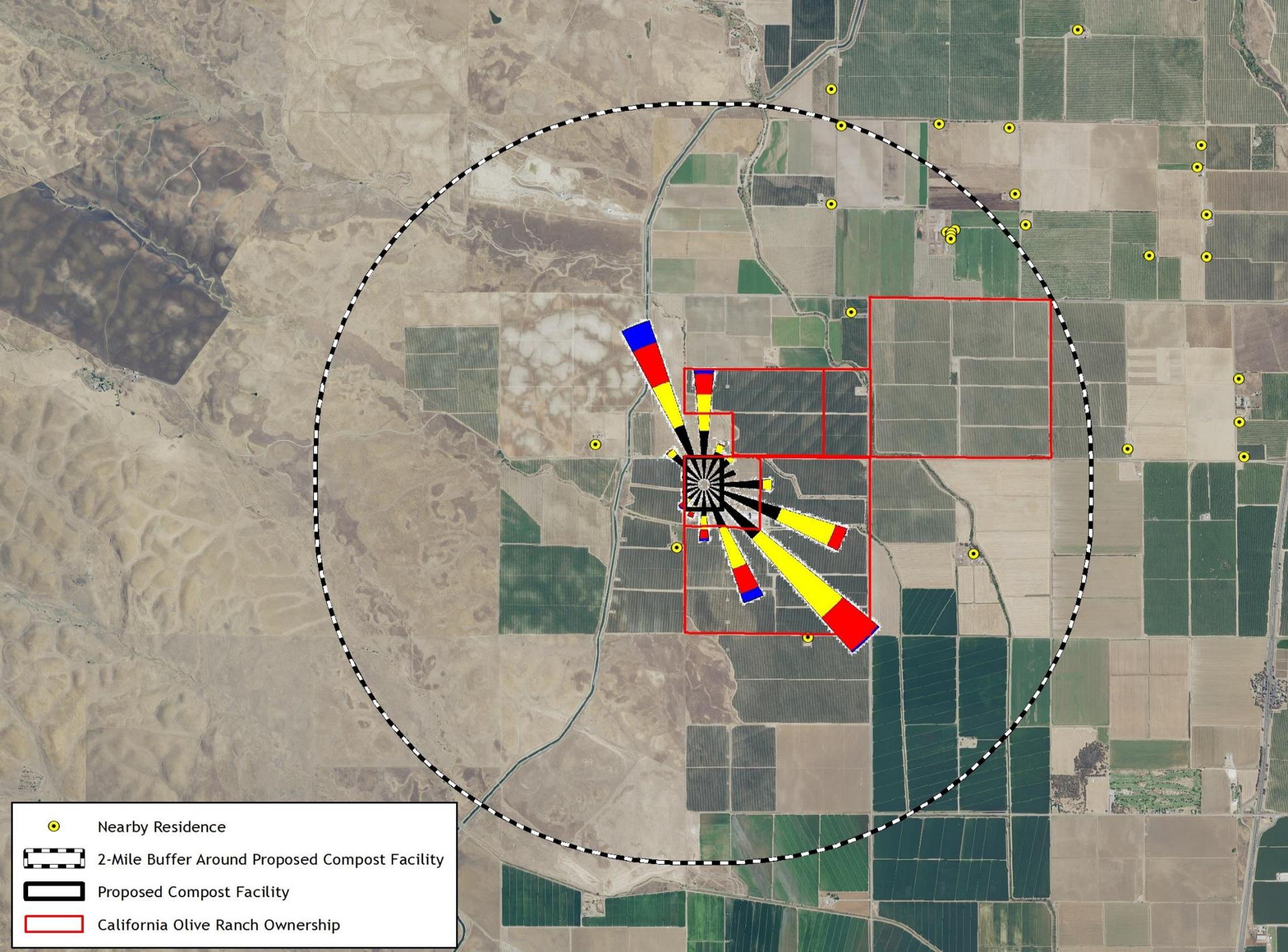
100' WIDE PG&E EASEMENT FOR TRANSMISSION
TOWERS PER BOOK 75, DEEDS, AT PAGE 228

CHECK DAM

Proposed Site Plan

PRIVATE GRAVEL ROAD





-  Nearby Residence
-  2-Mile Buffer Around Proposed Compost Facility
-  Proposed Compost Facility
-  California Olive Ranch Ownership