

**Permitting & Assistance Branch Staff Report**  
Revised Solid Waste Facilities Permit for the  
EDCO Station  
SWIS No. 37-AA-0922  
July 22, 2022

**Background Information, Analysis, and Findings:**

This report was developed in response to the County of San Diego Department of Environmental Health, Local Enforcement Agency's (LEA) request for the Department of Resources Recycling and Recovery (Department) concurrence on the issuance of a proposed Revised Solid Waste Facilities Permit (SWFP) for EDCO Station, SWIS No. 37-AA-0922, located in La Mesa, CA and owned by the City of La Mesa and operated by EDCO Disposal Corporation. A copy of the proposed SWFP is attached. This report contains Permitting & Assistance Branch (PAB) staff's analysis, findings, and recommendations.

The proposed SWFP was received on June 15, 2022. Action must be taken on this SWFP no later than August 14, 2022. If no action is taken by August 14, 2022, the Department will be deemed to have concurred with the issuance of the proposed Revised SWFP.

**Proposed Changes:**

The following changes to the first page of the SWFP are being proposed:

Parameter	Current Permit 2017	Proposed Permit
Maximum Permitted Tonnage	1,000 Tons/Day	2,000 Tons/Day
Design Capacity	1,000 Tons/Day	2,000 Tons/Day

Other Changes include:

1. Updates to the following sections of the SWFP: "Description of Facility," "Findings" section, the documents that describe and/or restrict the operation of the facility, and the "LEA Conditions" section; and,
2. Incorporate the updated Transfer Processing Report (TPR).

**Key Issues:**

The proposed SWFP will allow for the following:

1. Increase Maximum Permitted Tonnage from 1,000 Tons/Day to 2,000 Tons/Day; and,
2. Increase Design Capacity from 1,000 Tons/Day to 2,000 Tons/Day.

**Background:**

The EDCO Station is owned and operated by EDCO Disposal Corporation on land owned by the City of La Mesa and leased to the company on a long-term basis. This facility provides transfer/processing of solid wastes generated by the City of La Mesa and surrounding communities. Types of waste accepted include commercial, industrial and residential waste, construction and demolition debris, recyclables, green material, wood waste and other organics. EDCO Station is designed to assist the City of La Mesa and the region in complying with the waste reduction and recycling mandates outlined in the California Integrated Waste Management Act of 1989 (AB 939).

**Findings:**

Staff recommends concurrence in the issuance of the proposed Revised SWFP. All of the required submittals and findings required by Title 27 of the California Code of Regulations (27 CCR), Section 21685, have been provided and made. Staff has determined that the California Environmental Quality Act (CEQA) requirements have been met to support concurrence. The findings that are required to be made by the Department when reaching a determination are summarized in the following table. The documents on which staff's findings are based have been provided to the Branch Chief with this Staff Report and are permanently maintained by the Waste Permitting, Compliance, and Mitigation Division.

27 CCR Sections	Finding
21685(b)(1) LEA Certified Complete and Correct Report of Facility Information	Acceptable: The LEA provided the required certification in their permit submittal letter dated June 14, 2022.
21685(b)(2) LEA Five Year Permit Review	Acceptable: A Permit Review Report (PRR) was prepared by the LEA on July 30, 2021. The LEA provided a copy to the Department on July 30, 2021. The changes identified in the PRR are reflected in the proposed Revised SWFP.
21685(b)(3) Solid Waste Facilities Permit	Acceptable: Staff received a proposed Solid Waste Facilities Permit on June 15, 2022.
21685(b)(4)(A) Consistency with Public Resources Code (PRC) 50001	Acceptable: The LEA provided a finding in the proposed SWFP received on June 15, 2022, that the facility is consistent with PRC 50001. Waste Evaluation & Enforcement Branch (WEEB) staff in the Jurisdiction Compliance Unit found the facility is identified in the Non-Disposal Facility Element, as described in their memorandum dated June 28, 2022.

27 CCR Sections	Finding
21685(b)(8) Operations Consistent with State Minimum Standards	Acceptable: WEEB staff in the Inspections and Enforcement Agency Compliance Unit found that the facility was in compliance with all operating and design requirements during an inspection conducted on July 13, 2022. See Compliance History below for details.
21685(b)(9) LEA CEQA Finding	Acceptable: The LEA provided a finding in their permit submittal package received on June 15, 2022, that the proposed SWFP is consistent with and supported by the existing CEQA documentation. See Environmental Analysis below for details.
21650(g)(5) Public Notice and/or Meeting, Comments	Acceptable: A Public Informational Notice was posted by the LEA on May 26, 2022. No written or verbal comments were received by LEA or Department staff. See Public Comments below for details.
CEQA Determination to Support Responsible Agency's Findings	Acceptable: The Department is a responsible agency under CEQA with respect to this project. PAB staff has determined that the CEQA record can be used to support the Branch Chief's action on the proposed revised SWFP.

### **Compliance History:**

WEEB staff in the Inspections and Enforcement Agency Compliance Unit conducted a pre-permit inspection on July 13, 2022 and found that the facility was in compliance with applicable state minimum standards and permit conditions.

Below are the details of the facility's compliance history based on the LEA's monthly inspection reports during the last five years:

- 2022 – 2017 - No violations were noted.

### **Environmental Analysis:**

Under CEQA, the Department must consider, and avoid or substantially lessen where possible, any potentially significant environmental impacts of the proposed SWFP before the Department concurs in it. In this case, the Department is a Responsible Agency under CEQA and must utilize the environmental document prepared by the City of La Mesa Community Development Department, acting as Lead Agency, absent changes in the project or the circumstances under which it will be carried out that justify the preparation of additional environmental documents and absent significant new information about the project, its impacts and the mitigation measures imposed on it.

The changes that will be authorized by the issuance of the proposed SWFP include:

1. Increase Maximum Permitted Tonnage from 1,000 Tons/Day to 2,000 Tons/Day; and,
2. Increase Design Capacity from 1,000 Tons/Day to 2,000 Tons/Day.

These changes are supported by the following environmental document.

A Final Environment Initial Study/Negative Declaration (ND), State Clearinghouse No. 2022010065, was circulated for a 30-day comment period from January 7, 2022 to February 7, 2022. The project analysis concluded there are no significant impacts. The ND was adopted by the Lead Agency on March 17, 2022.

The LEA has provided a finding that the proposed revised SWFP is consistent with and supported by the cited environmental document.

Staff recommends that the Department, acting as a Responsible Agency under CEQA, utilize the ND as prepared by the Lead Agency in that there are no grounds under CEQA for the Department to prepare a subsequent or supplemental environmental document or assume the role of Lead Agency for its consideration of the proposed revised SWFP. Department staff has reviewed and considered the CEQA record and recommends the ND is adequate for the Branch Chief's approval of the proposed project for those project activities which are within the Department's expertise and/or powers, or which are required to be carried out or approved by the Department.

The administrative record for the decision to be made by the Department includes the administrative record before the LEA, the proposed revised SWFP and all of its components and supporting documentation, this staff report, the ND adopted by the Lead Agency, and other documents and materials utilized by the Department in reaching its decision on concurrence in, or objection to, the proposed revised SWFP. The custodian of the Department's administrative record is Ryan Egli, Legal Office, Department of Resources Recycling and Recovery, P.O. Box 4025, Sacramento, CA 95812-4025.

**Public Comments:**

The project document availability, hearings, and associated meetings were noticed consistent with the SWFP requirements. In accordance with 27 CCR Section 21660.4, the LEA attended a public information meeting conducted by the City of La Mesa Planning Commission on March 2, 2022. The LEA was present, recognized by the presider of the meeting, and available to answer questions. The LEA posted a public notice on May 26, 2022. No comments were received by the LEA or Department staff.

Department staff provided an opportunity for public comment during the CalRecycle Monthly Public Meeting on July 19, 2022. No comments were received by Department staff.

Attachment: Proposed Revised SWFP