

## McNamara, Cade

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**From:** Whittlesey, Joseph  
**Sent:** Wednesday, February 16, 2022 4:58 PM  
**To:** CEQAResponses  
**Subject:** DEH Comments on Nordic Aquafarms Land-Based Aquaculture Project DEIR (#16698)

Hello,

Humboldt County Division of Environmental Health (DEH) has concluded review of the subject DEIR. In response, DEH has prepared the following comments:

While DEH's Solid Waste LEA program has no objection to the determination of No Significant Impact with respect to Impact UTL-d (**Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**), our comments below clarify some erroneous and incomplete information noted in Chapter 3.13 and in Chapter 3.8.

**Chapter 3.13 pages 8 and 9: "Active permitted in-County transfer stations include the Humboldt Waste Management Authority facilities in Eureka or Samoa, California and the Recology Eel River Transfer Station in Fortuna, California"**

Humboldt Waste Management Authority owns and operates only the Hawthorne Street Transfer Station in Eureka. The Samoa facility referenced in the document, owned and operated by Recology Humboldt County, accepts only recyclable material; it does not intentionally receive municipal solid waste.

The following comments are offered to broaden the scope of the available solid waste handling capacity presented in Chapter 3.13 with the intention to lessen any solid waste impacts that the proposed project may present:

As most of the solid waste generated by the proposed project is anticipated to occur during construction phase, and as construction and demolition will generate a large amount of debris, it is important to note that of the 8 authorized solid waste transfer/processing sites that exist in Humboldt County, 2 of them are specifically designed to accept construction and demolition debris generated by commercial-scale construction or demolition projects. Additionally, there are 5 recognized Inert Debris Recycling Facilities operating in Humboldt County which can efficiently process concrete, asphalt, brick and other inert materials into reusable products. Advance planning by the applicant to assess the capacity of local facilities to handle the type and amount of debris to be hauled off-site for processing (in lieu of disposal) is warranted. The Solid Waste LEA program regulates all aspects of solid waste handling throughout the County, including the handling of construction, demolition and inert debris, is available at 707-445-6215 or envh@co.humboldt.ca.us, and can provide further information upon request.

**Chapter 3.13 page 9: "Implementation of the Compensatory Off-Site Restoration component would result in a temporary increase in solid waste disposal needs associated with the disposal of the creosote piles. The waste would be legally disposed of at local transfer station and then routed to the Anderson Landfill in accordance with all local, state, and Federal laws and regulations"**

Creosote piles are considered treated wood waste. Only 2 local transfer stations are currently authorized to accept such waste prior to transport to the Anderson Landfill. The Solid Waste LEA team, available at 707-445-6215 or envh@co.humboldt.ca.us, can provide further information upon request.

**Chapter 3.8 page 13 "Soil Gas Monitoring Program: The planned project development will occur within 1,000 feet of the Samoa Solid Waste Disposal Site (SWDS). An evaluation of soil pore gas from the SWDS will be required, per Title 27 California Code of Regulations Section 20925. A work plan to address soil gas conditions shall be submitted to the**

***Humboldt County Department of Environmental Health and CalRecycle for approval and implementation. The workplan shall contain installation of soil gas probes and a monitoring program to evaluate subsurface conditions and potential impacts to site development. One year of site monitoring for soil gas is anticipated to be completed as part of this assessment program.”***

An approved work plan to assess the potential for generation and migration of Landfill Gas is on file with Humboldt County Department of Environmental Health in accordance with Title 27 California Code of Regulations section 20921. Soil gas probes have been installed in accordance with T27 CCR 20925 and initial monitoring results do not exceed regulatory thresholds.

***Chapter 3.8 page 13 “Non-hazardous debris will be transported offsite for disposal as municipal solid waste (MSW) and metals shall be recycled. Much of the concrete, brick, and tile is considered usable material and machines will sort and downsize the material for preparation as onsite reuse or recycling. A Demolition Plan shall be submitted to the Planning and Building Department prior to issuance of a demolition permit.”***

Non-hazardous demolition debris not reused on site will be most efficiently managed at a construction and demolition debris operation or facility, a specialized kind of solid waste facility, rather than at a MSW facility as noted above. The Demolition Plan noted above shall be submitted to the DHHS Division of Environmental Health Solid Waste LEA Program as well as to the Planning and Building Department.

DEH’s Land Use Program offers the following comments to extrapolate on the requirements for discontinuing the use of the existing sanitary sewer leach field beyond the language provided in the “Sanitary Sewer” section of the Project Description (Chapter 2, Page 30): Proposed abandonment of the existing Onsite Wastewater Treatment System (OWTS) requires submittal of an OWTS Destruction Permit Application to DEH for review prior to commencement of any work on the system. DEH’s Land Use team is available to provide further information on OWTS demolition permitting requirements and procedures (707-445-6215, envh@co.humboldt.ca.us).

Please be advised, under California Health and Safety Code, Section 25404 et seq., any business that contains on site more than 55 gallons, 500 pounds, or 200 cubic feet of a hazardous material, or generates hazardous waste as part of their business activity, must report these activities to DEH’s Hazardous Materials Program and the California Environmental Reporting System.

Thank you,

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