

CALIFORNIA ENERGY COMMISSION

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DOCKET

11-AFC-2

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Siting, Transportation, and Environmental Protection Division

FILE: 11-AFC-2

PROJECT TITLE: Hidden Hills SEGS

<input checked="" type="checkbox"/> Email		<input type="checkbox"/> Meeting Location:	
NAME:	Ellie Townsend-Hough	DATE:	1/27/12
		TIME:	08:16
WITH:	John Hanzo, P2 Projects Manager, University of Nevada-Reno		
SUBJECT:	HHSEGS – waste management		

According to John Hanzo, P2 Projects Manager, University of Nevada Reno, Business Environmental Program, commercial/industrial may only use Class III landfills in the state of Nevada. Class III site disposal sites only accept industrial solid waste (Nevada State Code 444.560). Accordingly, BrightSource will not be eligible to use any of the landfills listed in Table 5.14-4R2 (attached). Therefore, Data Response #135 (attached) is not complete for staff to complete our analysis.

>>> John G Handzo <jhandzo@unr.edu> 1/27/2012 8:16 AM >>>

Good Morning Ellie:

Thanks for contacting the Business Environmental Program. We appreciate the opportunity to assist businesses with understanding Nevada's environmental regulations.

Per our conversation, I understand that you are interested in understanding the Nevada regulations governing solid waste landfills, particularly in regards to accepting solid waste generated outside of Nevada.

Here is a link to a website for the existing regulations: <http://ndep.nv.gov/admin/nrs.htm>

The solid waste regulations can be found here:

- The Nevada Revised Statutes (NRS) are listed here: [*444.440 - 444.645](tel:444.440)
- The Nevada Administrative Code (NAC) are listed here: [444.570 - 444.7499](tel:444.570)

The regulations for management of hazardous waste can be found here: (these mainly apply to businesses but are applicable for the permitted Treatment, Storage & Disposal Facilities (TSDF)

- The Nevada Revised Statutes (NRS) are listed here: [*459.400 - 459.600](tel:459.400)
- The Nevada Administrative Code (NAC) are listed here: [444.965 - 444.976](tel:444.965)

The state of Nevada Department of Environmental Protection, Bureau of Waste Management is one of three solid waste permitting authorities in Nevada. This page will explain how the authorities coordinate to manage solid waste in Nevada:

<http://ndep.nv.gov/bwm/back.htm>. At the bottom of that page you will note the state's recycling goal.

The state has three classes for landfills. They are as follows:

- ❖ Class I landfill: **NAC 444.5705 "Class I site" defined. (NRS 444.560)** "Class I site" means a disposal site which:
 - Is comprised of at least one municipal solid waste landfill unit including all contiguous land and structures, other appurtenances and improvements on the land used for the disposal of solid waste; and
 - Is not a Class II or Class III site.
- ❖ Class II landfill: **NAC 444.571 "Class II site" defined. (NRS 444.560)** "Class II site" means a disposal site:
 - Which is comprised of at least one municipal solid waste landfill unit;
 - Which accepts less than 20 tons of solid waste per day on an annual average;
 - For which there is no evidence of contamination of groundwater originating from the site;
 - Which serves a community that has no other practicable alternatives for waste management; and
 - Which is located in an area which annually receives no more than 25 inches of precipitation.

The term includes all contiguous land and structures, other appurtenances and improvements on the land used for the disposal of solid waste.

- ❖ Class III landfill: **NAC 444.5715 "Class III site" defined. (NRS 444.560)** "Class III site" means a disposal site which accepts only industrial solid waste.

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- Class III: Here is a factsheet about Class III landfills that might be helpful: <http://ndep.nv.gov/bwm/docs/mine.html>.

This page addresses the permitting process for a solid waste management facility in Nevada:

<http://ndep.nv.gov/bwm/swpermit.htm>.

This website has a list of all the permitted landfills in Nevada: <http://ndep.nv.gov/bwm/landfill.htm>. If you click on the name of the landfill in the list, a fact sheet about the landfill will appear. The fact sheets should have some information about the capacities of the landfills and any mandates they have to comply with. It also contains the contact information for the landfill operator. I suggest you contact the operator to discuss specifics about the waste proposed for disposal at their landfill. The landfills managed by the Southern Nevada Health District (SNHD) are listed, but they are not linked to fact sheets. Here is a link to the website with information about SNHD: <http://www.southernnevadahealthdistrict.org/solid-waste/permit-disposal-fac.php>. SNHD maintains permits for Apex and Laughlin landfills. The phone number for the solid waste management group at SNHD is 702-759-0600. I cannot assist you with additional information about SNHD. They have requested that we forward inquiries directly to them.

SNHD also manages the transfer facilities operated by Republic Services. Here is a website that might help you with those regulations: <http://www.southernnevadahealthdistrict.org/solid-waste/permit-disposal-fac.php#8>. Again, you will have to contact SNHD on 702-759-0600 for information on this facility.

NDEP Bureau of Waste Management does maintain some information on the transfer station on their website. Here is a link to that information: http://ndep.nv.gov/bwm/landfills_transfer.htm.

The list of permitted hazardous waste landfills can be found on this link: <http://ndep.nv.gov/bwm/hazard01.htm>. NDEP is the permitting authority for the US Ecology facility in Beatty, NV. Here is a link to the general permit conditions for the US Ecology facility: http://ndep.nv.gov/docs_11/us_ecology_rcra_permit-2011.pdf. This document is part of the public notice published by NDEP regarding a modification to US Ecologies permit:

http://ndep.nv.gov/docs_09/response_to_comments_rcra_permit_nevhw0019_f09.pdf. And this is the notice granting the modifications: http://ndep.nv.gov/docs_09/rcra_nevhw0019_p09.pdf.

I hope this information addresses your questions in concerns and that you find the information to be useful and worthwhile. Thanks for contacting the Business Environmental Program. Please do not hesitate to contact me if you have additional questions. Have a great week.

John Handzo, P2 Projects Manager
UNR - Business Environmental Program

Please note the new phone numbers

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CC: Mike Monasmith, Project Manager Paul Marshall, Water/Waste Management Senior Dick Ratliff, Staff Counsel	
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Prepared by: Mike Monasmith/ Ellie Townsend-Hough



Waste Management (135)

BACKGROUND

The Hidden Hills AFC (Section 5.14-8) states that during construction there will be a combination of hazardous and nonhazardous materials (both solid and liquid) that will be generated. The AFC summarizes the removal and proper disposal of these waste streams by means that include collection at satellite accumulation containers near the points of generation; daily waste removal to a contractor's waste storage area located in the construction laydown area; and, periodic 90-day removal and transportation of accumulated waste to an authorized hazardous waste management facility.

DATA REQUEST

135. Given the proposed project's proximity to Nevada, and the absence of hazardous waste collection facilities in California, please provide specific details on the Applicant's plans for nonhazardous and hazardous wastes that potentially would be generated at the facility as summarized in both Table 5.14-2 (construction phase) and Table 5.14-3 (operation phase). Please fully discuss:
- Disposal of nonhazardous materials, including the type and volume of waste expected to be generated (provide responses for both the construction phase and the operation phase), the facility that will receive the waste, its location, its current level (volume) of use, and its expected annual use on a cumulative basis (i.e. overall use by other existing and reasonably foreseeable facilities and projects in California and Nevada).
 - Disposal of hazardous materials, including the type and volume of waste expected to be generated (provide responses for both the construction phase and the operation phase), the facility that will receive the waste, its location, its current level (volume) of use, and its expected annual use on a cumulative basis (i.e. overall use by other existing and reasonably foreseeable facilities and projects in California and Nevada).

Response: Since the Applicant's last filing on January 6, 2012, the Applicant has received additional information on waste disposal options for HHSEGS. The new data is for the two additional landfills in Nevada that were proposed as potential candidates for disposal of non-hazardous waste generated by Hidden Hills. In addition, the Applicant received updated information on the Kettleman Hills disposal facility.

The data was requested in conjunction with preparation of Data Response 135 and is for the purpose of providing complete information, such as closure date and landfill capacity, in Table 5.14-4R2 (formerly Table 5.14-4 of the AFC). The revised table includes the additional data (in **bold**). Footnotes and a new reference have been added in this revision.



TABLE 5.14-4R2
Non-Hazardous and Hazardous Waste Disposal Facilities in the Vicinity of the HHSEGS Site

Landfill/ MRF/ Transfer Station	Location	Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)	Permitted Throughput (tons per day)	Estimated Closure Date	Enforcement Actions Taken
Non-Hazardous Waste Facilities						
Republic Services Sloan Transfer Station ^a	Clark County, NV (Outside of Sloan, NV)	No Cap	No Cap	No Cap	NA	None
Apex Regional Landfill	Clark County, NV (Outside of Las Vegas, NV)	5,967,744	4,840,019	No Cap	1/1/2175	None
Laughlin Landfill	Clark County, NV	6 million	1.5 million	No Cap	2029	None
Pahrump Valley Landfill	Nye County, NV	2.5 million ^f	NA	No Cap	2032	None
Hazardous Waste Facilities						
US Ecology Beatty Landfill	Nye County, NV (100 miles northwest of Las Vegas, NV)	1.66 million	1 million	No Cap	2020	Yes ^d
Chemical Waste Management, Inc. Kettleman Hills Landfill ^{b, e}	Kings County, CA	30.7 million	20 million	400 trucks/day	2044	None
Clean Harbors Buttonwillow Landfill ^b	Kern County, CA	14,293,760	9.2 million	10,482	1/1/2040	Yes ^c

NA: Information is not available at this time

^aNevada information from Southern Nevada Health District Solid Waste and Compliance (SWMA, 2011).

^bCalifornia information from CalRecycle Solid Waste Information System Database (SWIS) (CalRecycle, 2011a).

^cNo violations in 2007-2011, except for 2 violations in 2009 for Disposal Site Records

^dIn a 2008 EPA RCRA Inspection, they received a handful of violations relating to their thermal units, mostly for reporting issues. No violations after 2008.

^eCurrently operating B-18 phase 1 and 2 (permitted capacity of 10.7 million cy, almost at capacity) with planned opening of phase 3 (permitted capacity of 5 million cy and 8 yr life expectancy); after B-18 reaches capacity, B-20 will be opened on currently undeveloped land at the site with permitted capacity of 15 million cy and 24 yr life expectancy (Henry, 2012).

^fConverted from 1,500,000 tons (refuse density of 1,200lbs/cy; 1 ton=2,000lbs)

Additional Reference

Henry, Bob. 2012. Waste Management – Kettleman Hills Landfill. Personal communication with Beth Storelli/CH2M HILL. January 12.