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SEP 20 2004

ODOR IMPACT MINIMIZATION PLAN

for the

Limoneira Mulching Operations
Santa Paula, CA

403-E

RECEIVED
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By MGA

Submitted to:

County of Ventura Resource Management Agency-

Environmental Health Division
Ventura, CA

August 2, 2004

California Code of Regulations (14CCR) Title 14, Section 17863.4 (effective on April 4, 2003) requires an Odor Impact Minimization Plan (OIMP) for all compostable material handling operations such as mulching operations in agricultural settings.

The following OIMP is being submitted to the Ventura County Resource Management Agency—Environmental Health Division for the Limoneira Mulching Operations where compostable materials such as agricultural materials and green materials will be stored and processed.

Facility Name: Limoneira Mulching Operations

Facility Location: APN 090-0-180-08
Highway 126
Santa Paula, CA 93060

Mailing Address: 5275 Colt Street, Suite 3
Ventura, CA 93003-7399

Land Owner: Limoneira Associates
1141 Cummings Rd.
Santa Paula, CA 93060
Contact:
Phone (805) 525-5541

Operator: Calwood/Agromin
5275 Colt St, Ste 3
Ventura, CA 93003
Phone (805) 650-1616

Grinding Contractor: Calwood/Agromin
5275 Colt St., Ste 3
Ventura, Ca 93003
Phone (805) 650-1616

Material Type:

The processing operation will receive the following materials:

- Agricultural material from sources such as orchards and crop residues
- Green materials
- Yard trimmings

Site Operations:

This Agricultural Compostable Handling Operation will be handling both agricultural materials and green materials, with up to 7 days storage, where the temperature could rise

The closest receptors will be operations staff and management who will be onsite during operating hours to monitor the compostable materials handling operation. The operation is sited in rural Ventura County away from sensitive receptors. Attached are two aerial maps providing an overview of the surrounding area within 1,000 feet and 2 miles. A 1,000 foot area is typical of the area that must be described to the California Integrated Waste Management Board (CIWMB) when applying for a Full Solid Waste Facility Permit for landfills and other waste facilities.

The potential off-site receptors within 1,000 feet include the following (Limoneira is not aware of any non-company receptors):

- Limoneira owned agricultural out-buildings
- Oil producing facilities

The potential off-site receptors within 2 miles include the following:

- Dozens of residences downwind as shown on the attached map.
- Hundred of residences upwind as shown on the attached map.
- Correctional Institution
- Various agricultural buildings
- Rural agricultural residences

Each day the Operator will evaluate onsite odors and planned operations for the potential to release objectionable odors. If the operator detects an objectionable onsite odor, he will take the following actions:

1. Investigate and determine the likely source of the odor

2. Determine if onsite management practices could remedy the problem and immediately take steps to remedy the situation.

3. Determine whether or not the odor is traveling beyond the site by patrolling the site perimeter and noting existing wind patterns.

4. Determine whether or not the odor event is significant enough to warrant contacting the adjacent neighbors.

In the event of significant odors where a complaint has been filed, the protocol is for the Operator to inspect the location of a received complaint. The Operator shall attempt to determine if an offensive odor exists. In the event that the complaint cannot be verified in this manner, the Operator will continue to perform self-monitoring and continue the best management practices (BMPs) described in the operating document. The Operator shall implement additional or enhanced BMPs to minimize the likelihood of future odor detection.

The mitigation measures would be to immediately load out any odoriferous material to a permitted compost facility, a landfill, and reduce the holding time from seven days to 48

- Results and actions must be documented in the site operations log, which serves as the operation's permanent record.

Section 17863.4 (b) (4) - Design Considerations and Procedures to Minimize Odors.

Facility Siting: The siting of the green material chipping and grinding operations in rural Ventura County, away from any sensitive receptors within 1000 feet, is optimal to reduce the potential for odor complaints. The finished composted mulch products are used on land controlled by Limoneira.

Proper Drainage: Standing water is a potential source of odors. The Processing Operations Area is constructed on compacted soil and all weather operating pad and is sloped to drain. Differential settlement of the storage and processing areas will be minimized through regrading of surfaces as needed.

Section 17863.4 (b) (5) - Operation Considerations and Procedures to Minimize Odors.

Odor Control: Proper management techniques and use of appropriate tools can minimize offensive and nuisance odors. Odor emissions from the green material feedstock will be minimized through proper management of the storage piles in terms of limiting time to less than 7 days and rejecting odorous loads. Composting is not proposed.

Grass clippings loads will be mixed with wood to achieve an optimal C: N ratio and porosity to minimize odors.

Operations Procedures: The maximum storage time is 7 days. Should complaints be filed and verified, the storage time could be reduce at certain times of the year with high percentage of grass trimming or wet leaves to 48 hours if necessary.