



South Coast
Air Quality Management District

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Riverside County Planning Department
P.O. Box 1409
4080 Lemon Street, 9th Floor
Riverside, CA 92501

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Conditional Use Permit No. 3627 for a Proposed Organic Green Waste and Manure to Fertilizer and Soil Amendments Processing Facility

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the final CEQA document.

The AQMD staff is concerned that construction and operational air quality impacts were not estimated in the Draft MND. Specifically, construction emissions from soil preparation for the proposed facility, the evaporation pond, the internal circulation road and other activities are not estimated. Operational air quality impacts from the proposed grinder engine and screener equipment, composting emissions, and vehicles bringing green waste and manure to the site and removing fertilizer and soil amendments from the site were also not estimated. In addition, the Draft EIR does not cite compliance with applicable AQMD rules that affect operators of new or existing co-composting operations. Finally, the proposed grinder engine and screener equipment may be subject to applicable AQMD permit requirements. Details regarding these comments are included in the attachment.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

RVC101015-05
Control Number

Air Quality Analysis

1. With the exception of a Greenhouse Gas Emissions and Climate Change Impact Analysis (Albert A. Webb Associates, June 2010), the lead agency did not prepare a project-specific air quality analysis. Instead, the lead agency relies on conclusions from the previously prepared Final EIR for the County of Riverside General Plan (GP) certified in 2003. It is not clear, however, from the discussion in the Draft MND, whether the 2003 Final EIR for the County's GP specifically analyzed the construction and operational air quality impacts of the proposed facility that includes the following activities: construction that includes soil disturbance of 17.41 acres on two parcels on a 57.41 total gross acre site; development of a 1.33 acre evaporation pond; construction of a private road for internal circulation and four parking spaces; onsite placement of a 1,440 square foot modular office, operations that include processing up to 5,600 cubic yards of organic green waste, up to 2,615 cubic yards of horse bedding manure and up to 2,094 cubic yards of steer manure into fertilizer and soil amendments; the use of an onsite grinder and screener equipment; and emissions from vehicles bringing green waste and manure to the facility and emissions from vehicles leaving the site with the finished products, the fertilizer and soil amendments. The project description states that approximately 40 acres of the total acreage will remain undeveloped.

AQMD staff understands that CEQA Guidelines §15150 allow a lead agency to incorporate into their document information from another document, however, CEQA Guidelines §15150(c) also requires a summary of the information from the referenced document. If this specific project was analyzed in the 2003 Final GP EIR, the lead agency should have included quantitative results of the construction and operational analysis of the referenced Final GP EIR. Without this quantitative information, the lead agency has not demonstrated that air quality impacts from this project are insignificant.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2007 version 9.2.4 land use emissions model, which is an updated version of the URBEMIS model and was originally released in June 2007. The URBEMIS 2007 model includes updated on-road and off-road mobile source emission factors, as well as other enhancements. URBEMIS 2007 version 9.2.4 can be accessed at <http://www.aqmd.gov/ceqa/models.html> or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. In the Final MND, please provide a summary or table showing the projected emissions and supporting documentation, including the assumptions, methodologies, equations, emission factors or output sheets from any modeling performed and any changes to the model inputs. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

PM2.5 Significance Thresholds

2. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by

following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html. Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts or other pollutant air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Co-Composting Operational Emissions

3. Based on the project description, the proposed co-composting activities would result in operational air quality impacts including volatile organic compounds (VOC) and ammonia (NH₃). These and other operational air quality impacts, e.g., fugitive dust, on- and off-site equipment emissions, etc., should be estimated and included in the Final MND.

Based on the project description, the proposed co-composting operations would also fall under several AQMD rules. AQMD Rule 1133.2 – Emission Reduction from Co-Composting is a rule that applies to all new and existing co-composting operations. This rule includes the baseline emission factors that are required for estimating volatile organic compound (VOC) and ammonia (NH₃) air quality impacts (see comment #1). Rule 1133.2 also describes reporting and emission reduction strategy requirements applicable to co-composting operations. The lead agency should include all operational emission estimates including VOC and NH₃ air quality impacts from the co-composting activities in the Final MND. Other applicable rules that apply to co-composting activities include Rule 1133.1 – Chipping and Grinding Activities and Rule 1133 - Composting and Related Operations: General Administrative Requirements. The lead agency should cite the influence of compliance with the requirements of these rules and regulations in the Final MND.

4. In the project description, the lead agency describes proposed onsite co-composting equipment including a grinder and screener equipment. These equipment emissions should be estimated and included in the Final MND along with any assumptions, methodologies, emission factors, etc. used to calculate these operational air quality impacts. In addition, the proposed grinder engine and screener equipment may require permits under AQMD Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Regulation XIII – New Source Review, and Rule 1303 – New Source Review Requirements. Questions regarding permit requirements can be directed to AQMD staff at (909) 396- 2317.

Other Applicable Rules

5. In the Final MND, the lead agency should discuss the influence of complying with SCAQMD Rule 403 – Fugitive Dust and Rule 402 – Nuisance (odors).