



South Coast Air Quality Management District

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Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) **for the Proposed CR&R Green Energy Facility**

The South Coast Air Quality Management District (SCAQMD) 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 Draft Mitigated Negative Declaration.

In the project description, the lead agency proposes to expand the existing CR&R Perris Materials Recovery Facility (MRF) to include a 7.0 acre Green Energy Plant. The Green Energy Plant will produce Renewable Natural Gas (RNG) using up to two new anaerobic digesters with a daily conversion of up to 450 tons per day of municipal organic waste called feedstock (household municipal waste, greenwaste and food waste). The project will be built in phases with the first phase, conversion of up to 150 tons per day, planned to be operational by 2013. At this point, fifteen percent (15%) of the 11 diesel fueled trucks delivering waste will use RNG converted from feed waste brought to the energy plant. At full capacity, 450 tons per day, 25 percent of the diesel fueled feed waste transfer fleet would use the converted RNG.

The AQMD staff commends the lead agency for using cleaner burning RNG created at the proposed site in a percentage of its feedstock transfer fleet and to fuel collection trucks in order to reduce adverse health effects from its diesel fueled truck fleet emissions. The AQMD staff is concerned, however, that emissions from all emission sources have not been included in the regional operational air quality estimates. The AQMD staff is also concerned that localized impacts were not estimated given that sensitive receptors (single- and multi-family residences and Perris High School) are located within a quarter of a mile of the proposed Green Energy Plant. Further, potential health effects to those sensitive receptors from on-site stationary and mobile sources were not analyzed including the proposed backup flare and on-site trucking activity. The AQMD staff also reminds the lead agency of equipment that may require permits from the AQMD as a responsible agency. Finally, the lead agency should discuss cumulative operational air quality impacts in the Final IS/MND including the previous site Transfer

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Station/Material Recovery Facility expansion and the proposed project. In addition, other related projects that have been approved, are under consideration, or are foreseen in the reasonable future in the project vicinity should be included in the discussion of cumulative impacts. Further details are enclosed as an 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,



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

Attachment

IM:CT:GM

RVC110923-01
Control Number

Air Quality Analysis

1. Upon review of the Draft IS/MND and the Air Quality Impact Analysis (AQI Analysis), it is not clear if all long-term emission sources were included in the operational emission estimates reported in the Draft IS/MND. In its analysis, the lead agency used the CalEEMod land use computer model to estimate construction and operational emission impacts. There is also a discussion of long-term impacts but no specific estimates are included in the Draft IS/MND. In the AQI Analysis, the lead agency shows On-Road Feedstock Delivery Emissions in pounds per day (Table 5), but estimates from other operational emission sources are not shown. Missing are estimates from emission sources including the loading and off-loading of the feedstock; emissions from the background flare (projected flare emissions during startup and whenever RNG cannot be stored or used by the trucks or sent to the pipeline); emissions from trucks and other equipment operating at the site; e.g., queuing, moving about, idling, etc. Further, in the exhibits for the initial study, there is also a boiler and a generator shown but basic information about this equipment (size, rating, fuel type(s), periods of use, etc.) were not included in the Draft IS/MND. The peak daily emissions from these sources should be estimated in the Final IS/MND and compared with the applicable thresholds of significance. The lead agency should also describe the methodologies, assumptions, emission factors, and equations used to support its estimates for each emissions source. Without this additional analysis, the lead agency will not have presented the substantial evidence necessary to determine that potential impacts are less than significant.

Localized Significance Thresholds Analysis

2. In the Draft IS/MND and AQI Analysis, the lead agency estimated localized significance impacts for construction but did not analyze localized impacts for operations. On page 16 of the AQI Analysis, the lead agency states that the use of an LST analysis is optional and that “For the proposed project, the only source of LST impact would be during construction.” Although voluntary, the lead agency must still demonstrate that the project will not “expose sensitive receptors to substantial pollution concentrations” (Initial Study Question 5d). Further, the statement that localized impacts only apply to construction air quality impacts is incorrect and contrary to AQMD guidance. By not estimating operational air quality impacts from long-term sources including the backup flare, trucks and other equipment operating at the site, e.g., queuing, moving about, idling, etc., the lead agency has not demonstrated that long-term project impacts to sensitive receptors located near the site are less than significant. Based upon the surrounding land uses in the Draft IS/MND and upon an aerial map inspection, sensitive receptors including single- and multi-family residences are located directly north and Perris Lake High School is located less than a quarter mile to the west. AQMD staff recommends that the lead agency follow the guidance for performing a localized air quality analysis for operations.¹ These results should be compared with the applicable localized significance thresholds for operations and be incorporated into the Final MND.

¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

Health Risk Assessment

3. In the project description, the lead agency describes stationary and mobile equipment that would emit toxic air contaminants (TACs) from the proposed backup flare that would burn methane gas created by the digester process and from diesel fueled trucks operating on-site. The lead agency is reminded that the potential health risk from each of the permitted operating equipment from sources like the backup flare be assessed at the time the permit to construct is evaluated by AQMD staff. In addition diesel particulate matter (DPM) would result from diesel fueled transfer trucks queuing, idling, and moving about the site. Therefore, since sensitive receptors are located just north and to the west of the proposed project site, the AQMD staff strongly recommends that project health effects from all onsite sources be evaluated to demonstrate that sensitive receptors will not be adversely affected. Applicable AQMD rules and methodologies are available for these emission sources and for estimating cancer risks from mobile sources.²

Equipment Subject to Permit

4. In the project description, the lead agency describes the proposed construction and operation of the following equipment and processes: a biofilter, the anaerobic digestion process, the digester gas hydrogen sulfide and carbon dioxide removal, a backup flare, a generator, a boiler, an above-ground renewable gas (RNG) storage tank, and other equipment that may require permits from the AQMD. As a responsible agency, the AQMD has permitting authority over these emission sources. Prior to construction or operation of project equipment or processes, the lead agency should contact AQMD engineering and compliance staff at (909) 396-2684 to determine which equipment or processes would require AQMD permits.

Cumulative Impacts

5. Starting on page one of the Draft IS/MND, the lead agency discusses the proposed project site history providing a description of the CEQA documents published, compliance with mandates from public agencies whose approval is required for site activities, modifications to the Conditional Use Permit, etc. However, a discussion of the proposed project's cumulative air quality impacts as related to previously approved projects, projects under consideration, and projects foreseen in the reasonable future was not included in the Draft IS/MND. This analysis should be included in the Final IS/MND in order to describe possible health and nuisance impacts potentially related to a given neighborhood's cumulative exposure to emissions from sources that individually comply with AQMD, state, and federal rules.

² (1) AQMD Rule 1401 - New Source Review of Toxic Air Contaminants and Rule 1401.1 - Requirements for New and Relocated Facilities Near Schools, and

(2) Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions:
http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc .

Mitigation Measures – Operation

6. Based on the project description, residential sensitive receptors located directly north of the proposed project expansion and the local high school located one quarter mile west of the project site will experience an increase in emissions from heavy-duty truck traffic coming to the proposed Green Energy Facility site. Those sensitive receptors will experience an increase in long-term (operational) localized air quality impacts from diesel-fueled trucks queuing, idling, and operating on-site. The AQMD therefore recommends that the lead agency consider adding the following mitigation measures to reduce any significant operational air quality impacts from the project, if applicable and feasible:

NO_x – Recommended Additions:

- Provide minimum buffer zone of 300 meters between truck traffic and sensitive receptors;
- Restrict truck traffic on certain sensitive routes;
- Enforce truck parking restrictions;
- Restrict truck idling to five minutes or less, on and off-site;
- Electrify service equipment facility;
- Use “clean” street sweepers for dust created by truck track out;
- Pave road and road shoulders;
- Require a larger percentage of the waste transfer truck fleet to utilize alternative clean fueled vehicles; and
- Replace off-road mobile source equipment with alternative clean fueled equipment or commit to using higher tiered equipment, such as Tier 4.