



South Coast Air Quality Management District

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E-MAILED: OCTOBER 7, 2011

October 7, 2011

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed David's Tree Service Green Waste Recycling Project

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 Mitigated Negative Declaration.

In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes the construction of a new green waste collection and recycling facility on a 1.86 acre site. A one-story warehouse and office building is proposed (1,440 square foot office building and 4,560 square foot warehouse) with 27 parking spaces for 19 staff, visitors, work trucks and trailer stalls. In addition, two 1,000 gallon above-ground fuel-storage tanks (one for diesel and one for gasoline) would be installed on-site. The facility would generate approximately 100 tons of green waste per week, mostly wood residue waste, and then be hauled off-site three-to five times per month. The green-waste piles would be located in an area near the western project boundary. The proposed project would generate approximately 64 average daily trips and involve up to ten trucks including four medium-duty, two delivery/haul trucks, and two heavy duty trucks.

Based on the project description, the proposed 1,000 gallon gasoline storage tank and its dispenser are subject to AQMD permit requirements under Rule 461 - Gasoline Transfer and Dispensing. The proposed 1,000 gallon diesel storage tank and its dispenser are exempt. Further, if the chipping and stump grinding equipment use portable internal combustion engines that have a rating greater than 50 horsepower, they are also subject to AQMD permit requirements, unless they are registered with the California State Air Resources Board (CARB). The renting of a grinder would be exempt from AQMD permitting requirements as long as the provisions of Rule 219 (p)(17) are met, i.e., the owner has to have a valid AQMD permit or CARB registration.

Concerning project operations, the lead agency states that greenwaste chipping and grinding will occur but not composting. These operations would therefore be subject to the following AQMD rules including Rule 1133 – Composting and Related Operations –

General Administrative Requirements; Rule 1133.1 – Chipping and Grinding Activities; Rules 201/203 –Permit to Construct/Permit to Operate; Rule 401 – Visible Emissions (limitations); Rule 402 – Nuisance (odors and dust); and Rule 403 – Fugitive Dust. Questions concerning these rules and permit requirements can be directed to AQMD engineering and compliance staff at (909) 396-2684.

The lead agency also did not quantify fugitive PM10 emissions during operations, either from the storage piles onsite or from the chipping and grinding activities. In the Final MND these emissions should be quantified and mitigated to a level below significance if they are found to exceed AQMD thresholds. Mitigation measures could include:

- Covering the storage piles with tarps, plastic, or similar covering,
- Installing a three sided barrier equal to the height of the piles,
- Watering the piles,
- Ceasing all chipping/grinding activities during high winds (>25 mph)

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



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ORC110908-02
Control Number