



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:
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Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I St., 24th Floor
Sacramento, CA 95814

Draft Environmental Impact Report (Draft EIR) for the Proposed General Waste Discharge Requirements for Composting Operations

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Lead Agency is preparing a General Order for composting operations. The General Order will be used by the Regional Water Quality Control Boards (Regional Water Boards) to streamline permitting and protect water quality. The General Order includes conditions that address appropriate water quality protection measures at existing and proposed composting operations. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

In Chapter 6 – Air Quality and Greenhouse Gas, Table 6-5, the Lead Agency indicates that URBEMIS2007 was used to estimate emissions from construction activities. SCAQMD staff recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

Table 2-1 Allowable Feedstocks identifies acceptable forms of feedstock but does not exclude certain waste material commonly found in composting facilities. Construction waste such as gypsum drywall and grease water from restaurants are often included in feedstocks that result in substantial odor problems for downwind communities. It is not clear from Table 2-1 Allowable Feedstocks if these two materials, which have apparently been allowed at some composting facilities in the past, will still be allowed, and under what circumstances, in the future. SCAQMD staff recommends providing additional information on other waste materials that should be limited or excluded from composting facilities.

Lastly, SCAQMD staff recommends adopting additional mitigation measures to further reduce emissions from on and off-road heavy duty equipment. Please see Attachment for additional mitigation measures.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final EIR associated with this project.

Sincerely,

Jillian Wong

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Planning, Rule Development & Area Sources

JW:JC
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Control Number
Attachment

ATTACHMENT

Additional Mitigation Measures

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)¹ have enacted, require all on-site construction equipment to meet the following:
 - All off road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - A copy of each unit's certified tier specification, BACT documentation, and CARB or local air district operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - Encourage construction contractors and haul truck operators to apply for local air district funds to accelerate clean up of on and off-road diesel vehicles.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction and haul trucks away from congested streets or sensitive receptor areas.
- All materials transported on or off-site shall be securely covered.
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

¹ For example see the Metro Green Construction Policy at:

http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf