



# South Coast Air Quality Management District

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## **Draft Environmental Impact Report (DEIR) for the Proposed Solid Waste Facility Permit Revision (SWFP) at Coachella Valley Compost (CVC) Project (SCH NO. 2013081021)**

The South Coast Air Quality Management District (SCAQMD) staff 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 Environmental Impact Report.

### Project Description

The proposed project includes 1) increasing the Total Lease Agreement area at the Existing Coachella Valley Compost Facility by 4.53 acres (from 35.27 acres to 39.8 acres); 2) increase the maximum daily tonnage of compostable and non-compostable organic materials by 535 tons per day (from 250 tpd to 785 tpd); 3) Increase compost production by 200 tpd (from 250 tpd to 450 tpd); 4) Add 200 tpd of construction/demolition (C&D) waste processing as a permitted activity on approximately three acres west of the expanded compost management unit (CMU) for a maximum permitted daily solid materials intake tonnage of 985 tpd (compostable 785 tpd plus 200 C&D waste); 5) Increase the number of days of operation from six to seven days per week; 6) Increase the number of gallons per day (gpd) of grease trap liquids and gray water received at the facility by 42,500 gpd (from 12,500 gpd to 55,000 gpd); 7) add gray water to the list of liquids that may be accepted at the facility; 8) expand the existing 15-acre compost/organics processes area to a total of 31.9 acres; 9) Regrade portions of the site to allow for additional site uses and creation of detention basins; 10) Add an on-site septic systems for the employee break area; 11) add an equipment maintenance and staging area; 12) relocate the existing scalehouse and add a second scale to improve onsite traffic flow; 13) Realign the main entrance drive and improve the existing drainage area from the northwest corner of the closed landfill under the entrance drive into a new siltation basin on the west side of the realigned drive; 14) increase the amount of onsite processing equipment and rolling stock by up to 20-pieces of equipment; 15) Increase the total number of employees onsite by 41 (from 8 to 49); 16) Increase the total number of daily vehicles by 367 vehicles (from the current permitted 169 daily vehicles to 536 vehicles); 17) Provide groundwater monitoring wells up- and down-gradient per County Discharge Requirements; and change the facility name from Coachella Valley Compost Facility to Coachella Valley Compost.

### SCAQMD Rules and Regulations

Starting on page 5.3-7, the Lead Agency discusses the regulatory setting that the proposed SWFP will operate within including applicable SCAQMD rules and regulations. In addition to the SCAQMD rules and regulations listed beginning on page 5.3-10, the SCAQMD recommends including SCAQMD Rule 203 – Permit to Operate in the FEIR. Rule 203 requires that a person shall not operate or use any equipment, the use of which may cause the issuance of or control of air contaminants without first obtaining a written permit to operate from the SCAQMD. Rule 203 also requires that the equipment shall not be operated contrary to the conditions specified in the permit to operate. In addition to Rule 203, the FEIR should also cite how the proposed project will incorporate compliance with SCAQMD Rule 1157 - PM<sub>10</sub> Emission Reductions from Aggregate and Related Operations and Rule 1193 - Clean On-Road Residential and Commercial Refuse Collection Vehicles.

#### SCAQMD Permitted Equipment

Based on the project description, the following equipment may require review by the SCAQMD engineering and compliance staff to determine if any existing permits need modification or the equipment would require an initial permit to operate. Questions concerning permits can be directed to engineering and compliance staff at (909) 396-2317.

- Construction and Demolition Waste Screening Equipment;
- Greenwaste Grinding/Screening Equipment; and
- Cured Compost Screening Equipment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, 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 the enclosed comments.

Sincerely,

*Jillian Wong*

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Control Number

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