



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

October 22, 2015

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Mr. Samuel Kevin Wilson, P.E., Director
Public Works, Water & Development Services
City of Vernon
Department of City Planning
4305 Santa Fe Avenue
Vernon, CA 90058

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed
rPlanet Earth, LLC – Recycling Facility
Located at 3200 Fruitland Avenue**

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 CEQA document.

Air Quality Analysis

In the Draft MND, the Lead Agency proposes to construct and operate a recycling and packaging manufacturing facility. In the Air Quality Section, regional construction and operational activity emission estimates were included but only localized significance threshold impacts for construction were shown. In the Final MND, the Lead Agency should estimate the potential localized operational air quality impacts from all on-site activities for CEQA and SCAQMD permitting purposes. The Lead Agency did not include an estimate for localized operations from on-site activities. Potential on-site emissions include service equipment, mobile source emissions from vehicles operating at the site (entering, idling while arriving at loading/unloading stations, and departing), area emissions, and air quality impacts from permitted equipment. For permitted equipment, the Final MND should include a detailed equipment list with the specific number and types of equipment, fuel sources, and hours each piece of equipment will operate daily. The numbers and types of control equipment should also be described, e.g., the bag houses, cyclones, etc. The amount of daily and annual throughput should also be included. All emission calculations should be documented to show the methodologies, equations, emission factors, etc., used to estimate the on-site equipment emissions and control efficiencies. This documentation can be included in the narration, footnotes, or in an appendix included with the Final CEQA document. Without estimating localized impacts from operations including the potential permitted sources and comparing the estimates with recognized thresholds of significance, the Lead Agency has not demonstrated that these impacts are less than significant.

Odors

In addition, the Lead Agency addresses potential odors stating that conditions of approval by the Lead Agency will require that baled plastic bottle material (post-consumer Polyethylene Terephthalate - PET) be cleaned prior to delivery to the project site. It is not clear though if the cleaning refers to only the outside of the baled plastic bottles. Bottles that have residual organic materials inside, even in small quantities, often release odors when the bottles are grinded into flake prior to the dry and wet wash steps. Since that would be a potential odor issue, the Final MND should clarify if the delivery cleaning requirement for material delivered to the site also refers to complete cleaning of the inside of the containers as well. If not, the Final MND should address this potential odor issue in the Final MND.

Site and Circulation Plans

Next, the Transportation/Traffic section should include the routes the proposed traffic will use to operate to and from the site. The Draft MND estimated approximately 151 total vehicle trips daily including 65 truck trips. The Final MND should include a site plan showing where the proposed building, canopy and equipment within the facility will be located. A site circulation plan showing the flow of in-coming and out-going traffic; loading and unloading areas; and any potential places where queuing could occur, etc., is also recommended. Finally, the vehicle routes for both non-truck and truck traffic should be included in the Final MND. This information will show how the proposed traffic will access the facility from the freeways and surrounding streets (that may include sensitive receptors) mentioned in the Draft MND for the facility site that is expected to operate 24 hours a day 7-days a week.

SCAQMD As A Responsible Agency

In the Environmental Checklist under “Other Public Agencies Whose Approval is Required”, the SCAQMD should be added as a responsible agency because of its permit granting authority for applicable equipment based on the Draft MND’s project description. If the project applicant intends to rely on this MND for issuance of air quality permits, the Final MND should contain sufficient detail in order for the SCAQMD to issue applicable permits. Further, the Lead Agency states that all equipment will be installed and operated in accordance with SCAQMD permits, but permit applications have yet to be submitted to the SCAQMD for the proposed facility. Finally, SCAQMD permit records also indicate that there are two active permits for a soil vapor extraction systems still operating on-site. If the new owner intends to take responsibility for operating the existing permits, change of ownership permit applications would need to be submitted to the SCAQMD. Questions concerning SCAQMD permit requirements can be directed to SCAQMD Engineering and Compliance staff at (909) 392-2504.

Mr. Samuel Kevin Wilson,
Director

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Please provide the SCAQMD staff 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 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,

Jillian Wong

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