



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

October 31, 2017

rbrady@rivco.org

Russell Brady, Project Planner
Riverside County Planning Department – Mailstop #: 1070
4080 Lemon Street
P.O. Box 1409
Riverside, CA 92502-1409

Mitigated Negative Declaration (MND) for the General Plan Amendment No. 1171 and Conditional Use Permit No. 3741

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to permit an existing compost facility and increase from the existing Registration Tier I Permit of 12,500 cubic yards to a Regional Tier II Composting Facility that will process up to 130,000 cubic yards of green and organic material at any one time on approximately 202 acres (Proposed Project). SCAQMD staff understands that the digestate soil amendment that is produced at the CR & R Incorporated (CR & R) facility that is located in Perris, California will be shipped to the Proposed Project¹.

SCAQMD Staff's General Comments

SCAQMD staff has concerns about the air quality and health risk assessment (HRA) analyses in the MND. The air quality analysis did not disclose the Proposed Project's daily operational VOC emissions, and the modeling parameters for the HRA may have led to an under-estimation of the Proposed Project's health risks. Details are included in the attachment.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. 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 Ryan Bañuelos, Air Quality Specialist, CEQA, at (909) 396-3479, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
RVC170920-03
Control Number

¹ MND. *Project Description*. Page 1 of 61.

ATTACHMENT

Air Quality Analysis – Daily Operational VOC Emissions

1. The Lead Agency found that the Proposed Project's operational emissions from VOC would not be an impact. To support this finding, the Lead Agency stated that VOC emissions associated with the decomposition would occur with or without the Proposed Project, and that the Proposed Project would reduce VOC emissions². The Air Quality Analysis in the MND did not calculate the Proposed Project's operational emissions from VOC. However, based on a review of the Air Quality and Greenhouse Gas Technical Report³, SCAQMD staff was not able to determine whether the daily operational VOC emissions of approximately 420 pounds per day (lbs/day) would be generated by the Proposed Project or the Perris facility. If the Proposed Project's VOC emissions would be 420 lbs/day, this would exceed SCAQMD's air quality CEQA significance threshold of 55 lbs/day for VOC, and feasible mitigation measures will be required. If the VOC emissions in the Air Quality and Greenhouse Gas Technical Report were not for the Proposed Project, SCAQMD staff recommends that the Lead Agency calculate the Proposed Project's daily operational VOC emissions in the Final MND and consider mitigation measures if VOC emissions would be a significant adverse impact.
2. The Lead Agency used the emission factors for VOC and ammonia from SCAQMD Rule 1133.3 – Emission Reductions from Greenwaste Composting Operations⁴ to calculate those emissions for the decomposition or curing phase of the Proposed Project. SCAQMD Rule 1133.3 applies to the active composting phase which is the phase of the greenwaste composting process that begins when organic waste materials are mixed together for composting and lasts a minimum of 22 days under controlled conditions or until the compost has a Solvita Maturity Index of five or greater measured⁵. As defined in Rule 1133.3, curing is a phase that begins immediately after the end of the active phase of composting. Therefore, SCAQMD staff recommends that the Lead Agency provide additional information to justify the use of emissions factors for VOC and ammonia from SCAQMD Rule 1133.3 for calculating those emissions from the curing phase.

Health Risk Assessment (HRA)

3. The air dispersion model only included one emission source (PAREA1). PAREA1 only represents the "Compost Area Sources Throughout Facility." SCAQMD staff recommends the Lead Agency revise the HRA to include diesel particulate matter (DPM) sources such as truck travel, truck idling, on-site heavy duty equipment, and stationary equipment to ensure potential maximum concentrations of DPM are identified and that impacts are properly analyzed.
4. The Lead Agency used EMFAC2011 to generate emission factors. EMFAC2014 is the most recent available version that has superseded EMFAC2011 since December 30, 2014⁶. Therefore, the SCAQMD staff recommends that the Lead Agency use EMFAC2014 to revise the HRA in the Final MND.

² MND. *Air Quality*. Page 15 of 61.

³ MND. Air Quality and Greenhouse Gas Technical Report. Page 44 of 45.

⁴ MND. Air Quality and Greenhouse Gas Technical Report. Page 45 of 45.

⁵ South Coast Air Quality Management District. Rule 1133.3 Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1133-3.pdf>.

⁶ EMFAC2014: <https://www.arb.ca.gov/emfac/2014/>.

Permit and SCAQMD Rule

5. Since the Proposed Project requires a SCAQMD permit for operating the trammel screener, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Additionally, the Lead Agency should include a discussion in the Final MND to demonstrate compliance with SCAQMD 203 – Permit to Operate.

Odor Impact Minimization Plan (OIMP)

6. The Lead Agency stated that all commercial composting facilities in California, including the Proposed Project, are required to prepare, implement, and maintain a site-specific Odor Impact Minimization Plan (OIMP) pursuant to Title 14, California Code of Regulations, Chapter 3.1, Section 17863.4⁷. However, after a review of the MND and the associated Air Quality and Greenhouse Gas Technical Report, SCAQMD staff is not able to find the information on odor minimization methods for the Proposed Project. Therefore, it is recommended that the Lead Agency provide additional information on the Proposed Project-specific OIMP in the Final MND. SCAQMD staff recommends including the following information in the OIMP, at a minimum, in the Final MND:
 - a. Whether the Proposed Project would use misting systems to reduce composting odors. In the event misting systems are reasonably foreseeable odor minimization methods for the Proposed Project, the Final MND should include a discussion to disclose the amount of potable water that will be required for operating the misting systems.
 - b. Whether the Proposed Project would use odor neutralizers or other additives instead of mister systems to reduce composting odors. Odor neutralizers⁸ or other additives may contain VOCs and toxic compounds. If using these products are reasonably foreseeable odor minimization methods for the Proposed Project, and to facilitate a good-faith effort at full disclosure during the CEQA process (CEQA Guidelines Section 15003(i)), the Lead Agency should calculate VOC emissions from using these products and include them in the Proposed Project's operational VOC emissions to determine the level of significance in the Final MND.
 - c. The mechanisms and process for handling a complaint pertaining to an odor emanating to a compost operation pursuant to California Health and Safety Code Sections 41700 and 41705.

⁷ MND. *Air Quality*. Page 23 of 61.

⁸ The odor neutralizing products used in the odor misting system should have no adverse environmental impacts. The formulations should be free of toxic compounds, VOC, and fragrance. Many products available in the market attempt to mask odors with fragrances, which can also result in odor complaints.