



South Coast Air Quality Management District

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

SENT VIA USPS AND E-MAIL:

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sshammas@lacsds.org

Samer Shammam, Supervising Engineer
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601

Mitigated Negative Declaration (MND) for the Proposed Food Waste Receiving and Digestion Program

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 MND.

SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to demolish the obsolete out-of-service digesters and construct a new Food Waste Facility which consists of a grit and plastic removal system, additional biogas pipelines, back up flares, and expansion to the CNG fueling station (Proposed Project). The Proposed Project would include the receipt of food wastes to be co-digested with biosolids in existing digesters to generate biogas, which would be processed into renewable natural gas to be sold as vehicle fuel or energy production. Additionally, the Proposed Project would divert approximately 610 dry tons per day of waste from existing landfills. Based on a review of aerial photographs, the Proposed Project is bounded by industrial and commercial uses to the north, east, south, and west.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that construction and operational emissions are less than significant. SCAQMD staff has concerns about the air quality analysis in the MND. The air quality analysis utilized assumptions which have likely led to an under-estimation of emissions. Please see the attachment for more information. The attachment also included information of SCAQMD permits, rules, and regulations.

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 any air quality questions that may arise from this comment letter. Please contact me at (909) 396-3308 if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:JC:CT:JA
LAC171208-05
Control Number

ATTACHMENT

Air Quality Analysis

1. The Lead Agency found that the Proposed Project's regional operational emissions would be less than SCAQMD's regional air quality CEQA significance threshold for criteria pollutants¹. However, the Lead Agency assumed that all of the Proposed Project's inbound collection trucks were not new trips because they would have traveled to another solid waste landfill even if the Proposed Project were not implemented². The Lead Agency's finding was based on a "net zero travel distance" that incorrectly assumed that the Proposed Project would reduce emissions by changing the distances that the collection trucks would travel without the Proposed Project. The Proposed Project would not eliminate collection truck trips that would otherwise haul materials to another waste facility. Further, there is no analysis that collection truck trips would be eliminated to support such an assumption. By excluding the emissions from collection truck trips caused directly by and attributed to the Proposed Project, the MND has likely underestimated the Proposed Project's operational emissions from collection trucks. Therefore, SCAQMD staff recommends that the Lead Agency include the emissions from collection truck trips in the Final MND to ensure the Proposed Project's operational impacts on air quality are adequately analyzed and disclosed.

Permits

2. Since permits from SCAQMD would be required for the Proposed Project, this makes SCAQMD a Responsible Agency for the Proposed Project, and the Final MND should identify SCAQMD as a Responsible Agency. The Proposed Project is considered a major modification to a major stationary source and will require the submittal of complete and timely permit applications for:
 - a. Food waste processing system (Note: any grinders and separators that are not "in-line" with the processing system may also need their own permits)
 - b. Odor control systems for the food waste processing system
 - c. Flares
 - d. Modification of the biogas conditioning system
 - e. Rule 1166 VOC Contaminated Soil Excavation Plan

Should there be any questions on permits, please contact SCAQMD's Engineering and Permitting staff at (909) 396-2737. For more general information on permits, please visit the SCAQMD's webpage, at: <http://www.aqmd.gov/home/permits>.

Compliance with SCAQMD Rules and Regulations

3. The Final MND should discuss how the Lead Agency will comply with other applicable SCAQMD rules and regulations, including, but are not limited to, the following:
 - a. Rule 201: Permit to Construction
 - b. Rule 203: Permit to Operate
 - c. Rule 212: Standards for Approving Permits and Issuing Public Notice

¹ Mitigated Negative Declaration – Table 2-4: Summary of Regional Peak Daily Operational Emissions.

² MND – Page 2-15.

- d. Rule 401: Visible Emissions
- e. Rule 402: Nuisance
- f. Rule 403: Fugitive Dust
- g. Rule 1166: Volatile Organic Compound Emissions From Decontamination of Soil
- h. Regulation 13: New Source Review
- i. Rule 1401: New Source Review of Toxic Air Contaminants
- j. Rule 1403: Asbestos Emissions from Demolition/Renovation Activities
- k. Regulation 30: Title V Permits