



# South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

December 6, 2013

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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Conditional Use Permit (CUP) No. 3252 Revised Permit No. 4 for the SA Recycling Facility in Thousand Palms**

This letter represents a hard copy of the e-mail SCAQMD staff sent to the Lead Agency on November 26, 2013.

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.

In the Air Quality Section on page 26 under Control Measures, the Draft MND/Environmental Assessment (EA) references a number of SCAQMD rules that apply to the existing operation and the proposed project. As noted, SCAQMD Rule 1133.3 – Emission Reductions From Greenwaste Composting Operations will apply to the proposed composting operation.

In addition to the rules listed on page 26 and SCAQMD Rule 1133.3, the Final MND should cite compliance with other SCAQMD rules including 201 – Permit to Construct, and Rule 203 – Permit to Operate, both of which require a permit to construct and operate for equipment which emits or controls air contaminants; Rule 401 – Visible Emissions which limits single sources to 20 percent opacity for not more than three minutes in an hour; Rule 1133 – Composting and Related Operations – General Administrative Requirement, which requires initial registration and annual process updates; and Rule 1403 – Asbestos Emission from Demolition/Renovation Activities which can apply to waste processors who receive asbestos containing waste material that should have been taken to an approved asbestos waste facility. Since this facility receives concrete and metal waste, potential asbestos containing material may be contained within or attached to such material.

Finally, the SCAQMD staff notes that greenwaste processing and composting operations have been the subject of SCAQMD Rule 402 – Nuisance violations as the result of complaints from the public about odors from such operations. The current facility has not been the subject of any complaints received by the SCAQMD since January 1, 2011, and continuing to the present. That said, the lead agency should ensure that proper greenwaste processing and composting operation based on best management practices should be incorporated into the proposed project to mitigate potential nuisance odors. Also, experience has shown that non-greenwaste material such as greasy water and other material containing organic wastes that generate odorous compounds when undergoing breakdown, should be avoided to prevent or reduce odor complaints from the public.

SCAQMD rules and regulations mentioned are available at the AQMD website, [www.aqmd.gov](http://www.aqmd.gov). Questions concerning the above-mentioned rules can be addressed to the Engineering and Compliance staff at (909) 396-2317.

Please provide the SCAQMD 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,



Ian MacMillan  
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IM:DJ:GM

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