



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Coachella Valley Compost (CVC) Solid Waste Facility Permit Revision (SWFP) Environmental Assessment No. CVC 2012-01

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 Mitigated Negative Declaration.

The Lead Agency proposes the following revisions to the existing Solid Waste Facility Permit (SWFP) operations including the following: 1) increase the maximum daily tonnage of compostable and non-compostable organic materials processed at the facility from 250 tons per day (tpd) to 785 tpd; 2) compost up to 450 tpd of organic materials; 3) an increase of 200 tpd of construction and demolition waste processed (a sorting facility for this purpose would also be constructed); 4) increase operations from six to seven days per week; 5) increase the amount of grease trap liquids and gray water allowed at the facility, increasing the total amount received from 12,500 gallons to 55,000 gallons per day; 6) increase the number of employees working at the facility from eight to 49 people; 7) increase the overall number of daily trips from 256 to 1,072 vehicles, an increase of 816 daily trips; 8) provide groundwater monitoring wells; and 9) other operational and administrative changes will occur. Construction will begin in late 2013 and be completed with operations incorporating the permit revisions starting in mid-2014.

Rather than using the default one-way trip length of 13.3 miles in the California Emissions Estimator (CalEEMod) land use model to estimate regional on-road vehicle air quality impacts from trucks coming to the project site, the Lead Agency should include actual trip lengths from the different vehicle types points of origin or destinations as estimated by the project applicant for the proposed project's increase in vehicle activity. The potential operating ranges from local and non-local haulers, self-haulers, vehicles bringing grease trap liquids and/or gray water, etc., should be included in the Final MND. In addition, the actual distance to the Edom Hill Transfer Station should be used for the transfer trucks, as well as the potential destinations and distances of the recovered recyclable materials customers as documentation to support the trip lengths used in the

modeling. Otherwise, the Final MND lacks the documentation necessary to support the Lead Agency's determinations concerning significant impacts.

Further, in addition to Rule 1133.3 cited in the Draft MND, the Final MND should cite other SCAQMD rules and regulations that apply to the proposed facility improvements that fall within the SCAQMD's authority as a responsible permitting agency. In addition, although the facility may already have valid permits or permit applications pending for the proposed project, SCAQMD Engineering and Compliance staff should be consulted during the CEQA process to ensure that the facility permit situation is in order. Finally, because the proposed project includes a significant increase in diesel fueled truck traffic that will pass by sensitive receptors, a health risk assessment should be conducted to determine those impacts. Further details for the aforementioned are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be available to work with the Lead Agency to address these issues and any other air quality 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
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:CT:GM

RVC130808-03
Control Number

Air Quality Analysis

Operations

Vehicle Trip Lengths

1. Currently, the California Emissions Estimator Model (CalEEMod) shows a trip length of 13.3 miles for trucks coming from and going to the facility. In the project description, the Lead Agency does not describe the service area, i.e., cities where incoming vehicle/truck trips originate or an estimate of destinations where recyclables would be processed. If documented, this might be satisfactory for local collection truck contractors but too low an estimate for other collection trucks from outside of the immediate area and some self-haul vehicles. If the Lead Agency has specific information about points where the trucks originate, those specific distances should be used in the air quality and health effects analyses rather than the CalEEMod default trip rate cited in the Draft MND.

As examples, the proposed increase in vehicle traffic from non-local collection trucks, self-haulers, vehicles bringing grease trap liquids and/or gray water, etc., could come from the following cities: Desert Hot Springs, a distance of approximately 33 miles one-way from the project site; Palm Springs 28 miles; Cathedral City 23 miles; Mecca, 17 miles, etc. For the transfer trucks, the Edom Transfer Station is approximately 33 miles one-way from the project site. Further, the air quality documentation should also include a conservative estimate of vehicle miles traveled for the commodities trucks sending recycled products to their business customer locations as planned by the project applicant. This supporting documentation should be included in the Final MND and the applicable analyses should be revised to reflect the trip lengths from these known service areas and destinations. Otherwise, operational impacts would be underestimated and the Lead Agency would also not have demonstrated that operational impacts are less than significant.

Health Risk Effects Assessment

2. In the project description, the agency estimates 1,072 daily project trips including 149 medium and heavy duty trucks that are diesel fueled (145 medium-heavy trucks and 4 heavy-heavy-duty trucks), a substantial increase in the number of heavy-duty diesel truck trips operating from the project site. Since the particulate portion of diesel exhaust emissions from these diesel fueled vehicles has been classified by the California Air Resources Board as carcinogenic and these diesel-fueled vehicles will travel past sensitive receptors including residences along Dillon Road (Vineyards Luxury Motor Coach Resorts Golf Course), an air toxics health risk analysis should be included in the Final MND. This analysis should include emissions from truck travel from the project to the I-10 Freeway and on-site operating emissions including idling. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for

Analyzing Cancer Risks from Mobile Source Diesel Emissions.¹ Should the Lead Agency determine that the proposed project expansion will have significant health effect impacts, additional mitigation would be warranted.

SCAQMD Rules and Permitting Responsibilities

3. This comment is made in SCAQMD's role as a responsible agency. In the Draft MND, the lead agency cites SCAQMD Rule 1133.3 (Composting and Related Operations - General Administrative Requirements). In the Final MND, the lead agency should also include how the Lead Agency will comply with the following SCAQMD Rules that apply to the proposed project:
 - Rule 402 (Nuisance);
 - Rule 403 (Fugitive Dust);
 - Rule 1133 (Composting and Related Operations - General Administrative Requirements);
 - Rule 1133.1 (Chipping and Grinding Activities); and
 - Rule 1133.2 (Emission Reductions from Co-Composting Operations).

In addition to citing the aforementioned rules in the Final MND, review of the project description shows that the following equipment may require review by SCAQMD Engineering and Compliance staff to determine if any existing SCAQMD permits need modification or if the equipment described would require an initial permit from the SCAQMD.

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

Questions concerning equipment permit requirements can be directed to Engineering and Compliance staff at (909) 396-2684.

Heavy Duty Diesel Collection and Transfer Vehicles

4. The proposed project will use heavy duty trucks to transfer waste from the proposed site to the on-site Transfer Station or the Edom Hill Transfer Station (26 miles one-way from the project site) described in the analysis. If a governmental agency owns or contracts out the disposal services at the existing site or project expansion, the Lead Agency should cite compliance with SCAQMD Rule 1193 - Clean On-Road Residential and Commercial Refuse Collection Vehicles for any future CEQA documents or applicable analysis. This rule applies to public and private solid waste collection fleet operators that operate solid waste collection fleets with 15 or more solid waste collection vehicles and private fleet operators that provide solid waste

¹ This document can be downloaded from the AQMD's CEQA web pages at the following URL:
http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc .

collection services to governmental agencies to acquire alternative-fuel refuse collection heavy-duty vehicles when procuring or leasing these vehicles for use by governmental agencies in the South Coast Air Quality Management District.

Should the Lead Agency determine that the proposed project expansion will have significant regional emissions, the Lead Agency should consider additional mitigation to reduce the impacts from trucks that utilize the facility that are not subject to AQMD Rule 1193. As an example, this could include requiring that any heavy duty diesel truck operators that regularly use the facility to apply in good faith for funding to either retrofit or replace their engine from an established ARB or AQMD funding program (such as Carl Moyer, VIP, Prop 1B, etc.).²

² <http://www.aqmd.gov/tao/Implementation/index.htm> and http://www.arb.ca.gov/msprog/truckstop/azregs/fa_resources.php