



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Valley Verde Green Waste Recycling Facility**

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 project description, the Lead Agency proposes the construction of a green waste recycling facility that would process approximately 200 tons of yard waste per day. The proposed facility would receive waste from natural vegetation, landscape cuttings, and land clearing along with clean, unpainted wood from construction waste. The 6.06-acre site would operate 6:00 AM to 6:00 PM, Monday through Saturday and include approximately 170 total daily truck trips. The proposed truck traffic would operate on a route starting from Highway 111 and the 86 Expressway to Avenue 48. Currently, no sensitive receptors are located along this route.

### **Required Equipment Permits and Applicable SCAQMD Rules**

The equipment used at this facility will include grinding and screening machinery with an associated dust mist control system, all of which will require permits from the SCAQMD. Questions concerning permit applications can be directed to SCAQMD engineering and compliance staff at (909) 396-2591. Further, the Draft MND discusses compliance with SCAQMD Rules 403 – Fugitive Dust; Rule 1133 - Composting and Related Operations - General Administrative Requirements; and Rule 1133.1 - Chipping and Grinding Activities. In addition, the Lead Agency should also include compliance with SCAQMD Rule 402 – Nuisance in the Final MND.

### **Demonstrating Findings of Less Than Significant Impacts**

Although the Lead Agency included a narrative discussion of potential air quality impacts from project construction and operations, the Draft MND did not demonstrate that short- and long-term impacts are less than significant by estimating these emissions. Project emission impacts should therefore be quantified, compared with recognized thresholds of significance and included in the Final MND to demonstrate the Lead Agency's findings. To calculate the proposed project's emission impacts, the Lead Agency can utilize the current California Emission Estimator Model (CalEEMod)<sup>1</sup>. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The Lead Agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook.

### Mitigation Measures

Should the Lead Agency determine that emission impacts exceed the recommended SCAQMD daily significance thresholds for regional impacts, the SCAQMD staff recommends the following measures primarily for operations, if applicable and feasible:

- Design the facility such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.
- Install signs prohibiting all vehicles from idling in excess of five minutes, both on- and off-site.
- Require the site to clearly define the primary entrance and exit of the facility.
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
- Use alternate fueled off-road equipment, e.g., electric, CNG, etc., or commit to using higher tiered equipment, such as Tier 4.
- Sweep streets at the end of the day if visible soil or other debris is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- All trucks hauling loose materials are to be covered.
- Pave roads and road shoulders.
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue.

Additional mitigation measures are also available on the SCAQMD website to be implemented if the air quality impacts are determined to be significant<sup>2</sup>.

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

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<sup>1</sup> CalEEMod is accessible on the SCAQMD website at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling> .

<sup>2</sup> Mitigation measure suggestions can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies> .

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contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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