



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Mitigated Negative Declaration (MND) for the Proposed
Valencia Greenery Composting Operations at the Olinda Alpha Landfill Project
(Proposed Project) (SCH No.: 2022020473)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Orange County Waste & Recycling (OCWR) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the MND include baseline conditions and operational air quality impacts and South Coast AQMD permitting requirements that OCWR should include in the Final MND.

Based on the MND, the Olinda Alpha Landfill is an existing Class III landfill that only accepts municipal solid waste for disposal, and no hazardous or liquid waste can be accepted¹. Within the landfill, OCWR currently operates a pilot open windrow composting project and is in the approval process of implementing a Covered Aerate Static Pile (CASP) composting pilot project². The Proposed Project consists of implementation of a full-scale, two-phase composting operation within the Olinda Alpha Landfill to assist the cities in Orange County as well as County unincorporated areas in meeting the Senate Bill 1383's requirements for the diversion and recycling of organic waste materials. During operations, the Proposed Project is expected to receive 230 tons per day (tpd) of compostable organic waste³. The Proposed Project is located at 1942 Valencia Avenue, Brea, California 92823.

The Proposed Project will be constructed in two phases. Phase 1 will include construction of composting components, including a composting deck, a lined stormwater pond, and an expansion of the existing water tanks⁴. Phase I will operate for six months prior to Phase II construction beginning⁵. During Phase II, components of the CASP system will be constructed and installed, including piping and solar panels⁶. During operations, the Proposed Project will

¹ MND. Section 1.4. Page 3.

² MND. Section 1.6. Pages 4 to 10.

³ *Ibid.* Page 4.

⁴ *Ibid.* Pages 4 to 10.

⁵ *Ibid.*

⁶ *Ibid.*

utilize both open windrow and CASP composting methods⁷ and would generate 12 net new, two-way truck trips per day⁸.

Based on a review of the MND and supporting technical documents, South Coast AQMD staff has two main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. Baseline Conditions and Operational Air Quality Impacts Analysis: The MND explains that, when compared to the existing setting, the Proposed Project will not result in a change to green waste composting emissions. However, in the MND, OCWR does not quantify baseline conditions from the existing pilot composting operations. These operations also process smaller amounts than is expected by the Proposed Project. Further, the landfill currently accepts 746 tons per day (tpd) of processed green material (PGM) to be used as alternate daily cover, and 230 tpd will be diverted to the Proposed Project during operation. However, there is no qualitative discussion or quantitative comparison between baseline emissions from landfilling 746 tpd of PGM versus emissions from composting 230 tpd of PGM during Project operations. Without additional information or quantification of emissions, there is no substantial evidence in the record to support the statement in the MND that there is no change in emissions under the Proposed Project. South Coast AQMD staff recommends OCWR revise the operational air quality impacts to include baseline emissions and compare baseline emissions to the Proposed Project's operational emissions in the Final MND.
2. South Coast AQMD Permitting Requirements: In addition to South Coast AQMD Rules 402, 403, and 1133.3 that were discussed in the MND, the Proposed project will be subject to additional permitting requirements that should be discussed in the Final MND.

South Coast AQMD staff is available to work with OCWR to address any air quality questions that may arise from this comment letter. Please feel free to contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
MM/LS:AM
ORC220217-14
Control Number

⁷ MND, Section 1.6. Pages 6 to 10.

⁸ MND, Section 2.8 Page 50.

ATTACHMENT**South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment in the MND**

In the Air Quality Analysis Section of the MND, OCWR quantified the Proposed Project's maximum daily construction emissions. Based on the analysis, OCWR found that regional and localized construction activities would not exceed South Coast AQMD's regional and localized CEQA air quality significance thresholds for construction⁹. OCWR also quantified the Proposed Project's maximum daily operational emissions from implementation of both Phase I and Phase II. Based on this analysis, OCWR found that the Proposed Project would not exceed South Coast AQMD's regional and localized CEQA air quality significance thresholds for operation¹⁰. However, it did not appear that emissions from existing or future composting operations were quantified in the operational air quality analysis.

Although OCWR found that the Proposed Project would not result in significant air quality impacts during construction or operation, OCWR has committed to implementing 28 Project Design Features and Operational Control Measures to further reduce the Proposed Project's impacts to air quality. These measures are focused on both fugitive dust control during construction and odor control during operation¹¹.

South Coast AQMD staff's detailed comments on the MND are provided as follows.

1. Baseline Conditions and Operational Air Quality Impact Analysis

In the MND, OCWR quantified operational emissions from the operation of the following sources: mobile, energy, area, off-road equipment, and stationary source equipment. Additionally, OCWR explains that “[c]ompared to existing conditions, the proposed project would result in no change to the green waste compost emissions [...]”¹². Although there are two existing pilot composting projects onsite, the MND only provides general information on how much processed green material (PGM) is currently being composted by these pilot projects. The amount of PGM composted by each does not exceed more than 250 tons of material per year (tpy), but no emission estimates from these composting projects are provided in the MND¹³. Therefore, specific baseline composting operations, including emission levels from criteria pollutants common from composting operations such as VOCs and PM, are unknown and how composting operations during the Proposed Project will compare to existing conditions is also unknown. As such, the statement that “result in no change to the green waste compost emissions”¹⁴ is not supported with substantial evidence. Additionally, during the full-scale composting operations under the Proposed Project, Phases I and II will compost up to 94 tpd and 230 tpd of PGM, respectively¹⁵, which is more than the estimated 250 tpy that the pilot composting projects process currently. As such, it is likely that the Proposed Project may have more emissions from composting than under baseline composting conditions.

⁹ MND. Section 2.3. Pages 27 to 29.

¹⁰ *Ibid.* Pages 30 to 32.

¹¹ *Ibid.* Pages 34 to 40.

¹² MND. Section 2.3. Page 30.

¹³ MND. Section 1.6. Pages 5 to 6.

¹⁴ *Ibid.*

¹⁵ MND. Section 1.6. Pages 7 to 9.

Further, the landfill has historically received 746 tpd of PGM as alternate daily cover¹⁶, and 230 tpd of that PGM will now be transferred to the Proposed Project for composting. However, there is no additional information as substantial evidence within the MND that qualitatively explains or quantitatively compares how the Proposed Project's estimated composting emissions from 230 tpd of PGM will result in no net change to emissions when compared to existing landfilling emissions from the 746 tpd of PGM. If existing landfilling of the PGM results in greater emissions than anticipated from the Proposed Project's composting operations, this information is not provided or explained further within the MND. Therefore, South Coast AQMD staff recommends that OCWR revise the air quality analysis to include baseline emission calculations that can be compared to the Proposed Project's operational composting emissions. Baseline emissions should consider existing composting operations and landfilling of PGM. The change in emissions between baseline and Proposed Project can be compared to South Coast AQMD's regional air quality CEQA significance thresholds for operation to determine the level of significance, which can be used as substantial evidence to support the operational air quality impact finding in the Final MND. Alternatively, OCWR may qualitatively explain why the existing emissions from the existing composting projects and landfilling of PGM are greater than emissions anticipated from the Proposed Project's composting operations as substantial evidence to support the finding that there will be no change in emissions from the Proposed Project.

2. **South Coast AQMD Permitting Requirements**

South Coast AQMD is the CEQA Responsible Agency for the Proposed Project. In addition to the discussion of South Coast AQMD Rules 403, 1133, and 1133.3, the Proposed Project will be subject to the requirements of the following South Coast AQMD Rules and Regulations, which should be discussed in the Final MND to demonstrate that the Proposed Project will comply with them. Information on each of the rules and regulations is available on the South Coast AQMD's website at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

- Rule 201 – Permit to Construct
- Rule 203 – Permit to Operate
- Rule 401 – Visible Emissions
- Rule 402 – Nuisance
- Rule 431.2 – Sulfur Content of Liquid Fuels
- Rule 1133.1 – Chipping and Grading Activities
- Rule 1150 – Excavation of Landfill Sites (for example, excavation work associated with preparation and/or construction of the Proposed Project may need a Rule 1150 Landfill Excavation Management Plan)
- Regulation XIII – New Source Review
- Rule 1401 – New Source Review of Toxic Air Contaminants
- Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines
- Regulation XXX – Title V Permits

¹⁶ MND, Section 1.5, Page 4.

The Proposed Project will be required to submit complete and timely permit applications to South Coast AQMD for the following equipment:

- Applications for Permit to Construct and Permit to Operate will be required for screeners used to screen finished compost or other materials.
- Applications for Permit to Construct and Permit to Operate will be required for chipping and grinding equipment used to chip/grind feedstock or other materials.
- Applications for Permit to Construct and Permit to Operate will be required for aerated static pile system and any associated air pollution control system (e.g., biofilter), if present.
- Applications for Permit to Construct and Permit to Operate will be required for engines powering the screeners, chippers, grinders, or other equipment if the engines are rated above 50 brake horsepower (bhp) and are not used to drive locomotion of the screener, chipper, grinder, or other equipment.
- Applications for Permit to Construct and Permit to Operate will be required for engines providing emergency electrical power if the engines are rated above 50 bhp.

South Coast AQMD's Engineering and Permitting staff should be consulted in advance to determine whether or not any additional permits will be needed prior to start of the construction or operation of the Proposed Project. It is important that impacts from the permits be fully and adequately evaluated and disclosed as required under CEQA Guidelines Section 15096(b). The assumptions used in the air quality analysis in the Final MND will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology¹⁷ is being used by South Coast AQMD for determining operational health impacts for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, OCWR shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When OCWR's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

¹⁷ Office of Environmental Health Hazard Assessment. "Notice of Adoption of Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015". Accessed at: <https://oehha.ca.gov/air/crmr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.