



South Coast  
Air Quality Management District

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E-Mailed: August 24, 2012  
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**Review of the Draft Environmental Impact Report (Draft EIR) for the  
Horse Manure to Energy Conversion Facility Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the lead agency has not provided a clear description of the project's operational activities and insufficiently addressed the potential odor impacts from the proposed project. Also, the lead agency has provided a limited discussion related to the project's compliance with AQMD regulations. Further, the lead agency has presented significant impacts from the project's greenhouse gas emissions but did not include sufficient data in the Draft EIR that quantifies this impact. Therefore, the AQMD staff recommends that the lead agency provide additional information in the Final EIR that addresses these concerns. It may be beneficial for the lead agency and the project's air pollution control engineer to meet with AQMD's staff to review potential technical concerns. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC120629-01  
Control Number

### Project Description and Daily Throughput Volumes

1. The project description and air quality analysis in the Draft EIR present inconsistent information related to the daily volume of material that will be processed at the project site. For example, on page ES-3 of the Draft EIR the lead agency states that approximately 180 tons per day (tpd) of waste material will be available for conversion to energy, further, on page 2-8 of the Draft EIR the lead agency states that 245 tpd of waste material will be available for conversion to energy. However, the lead agency evaluates the project's peak daily air quality impacts based on 100 tpd of material processed at the facility (see pages 5-23 and 5-24). Therefore, the AQMD staff recommends that the lead agency clarify the peak daily volume of material that will be processed at the project site and analyze all potential air quality impacts from this activity.

2. Operational Emissions, Offsets, RECLAIM, BACT, Title V

The project's peak daily operational emissions identified on page 5-23 are based on the following control efficiencies 87% for NO<sub>x</sub>, 94% for SO<sub>x</sub>, and 99.9% for PM. Also, the emission factors for the project's fuel source are based on extrapolation of data from a two day test run that was performed at a facility in Idaho. However, the lead agency does not provide any supporting data or reference material to demonstrate that the Draft EIR assumed correct emission factors for the fuel source and the appropriate control efficiencies for the control technology proposed for the project. Therefore, AQMD staff recommends that the lead agency substantiate the project's peak daily emissions values by providing sufficient air quality data in the Final EIR including equipment specifications, studies, references, data and any other information necessary to demonstrate the project's impacts. Also, to demonstrate compliance with AQMD permitting requirements the lead agency should provide an analysis of alternative technologies applicable to the proposed project and present the project's peak daily emissions using these technologies. In the event that the proposed control strategies do not meet permitting requirements the lead agency may default to the alternative emissions analysis.

Further, given that the project exceeds four (4) tons per year of NO<sub>x</sub> the AQMD staff recommends that the lead agency provide discussion in the Final EIR on the project's compliance with AQMD's Regulation XX. Also, the project will need to provide an evaluation of BACT/LAER for the control of CO emissions. Based on the estimated emissions levels in the Draft EIR the proposed project will be considered major source (Title V).

3. Applicability of Composting Regulations (AQMD Rules 1133.2 and 1133.3):

The lead agency does not discuss the applicability of Rule 1133.2 (Emission Reductions from Co-Composting Operations) and 1133.3 (Emission Reductions from Greenwaste Composting Operations) to the proposed project. Therefore, the lead agency should discuss practices that will be employed to prevent composting from occurring at the project site in the Final EIR. In the event that the lead agency anticipates composting activity will occur at the project site the lead agency should provide discussion on compliance with the above mentioned AQMD regulations.

#### 4. Prevention of Odor Impacts and Nuisance

Given that the fuel source (horse manure) for the proposed project is known to have substantial odors associated with it the lead agency should address odors from operational activities at the project site in the Final EIR. Also, the lead agency should discuss how the project will comply with AQMD Rule 402 (Nuisance). Further, the lead agency should provide a project design feature or mitigation measure to avoid significant odor impacts from horse manure that is delivered at to the project site. Specifically, the AQMD staff recommends that the lead agency require horse manure to be handled and stored (including temporary storage and handling) in an enclosed building that is vented to a device such as a biofilter. This measure should control objectionable odors and gaseous emissions from the waste handling (receiving, conveying, and feed to gasifier) and manure drying process.

#### 5. Back-up Power

The lead agency should provide a project design feature or mitigation measure that requires sufficient standby emergency electrical generation in the event that a power outage occurs. The standby electrical generator should provide a smooth and controlled shutdown without the loss of air pollution controls. If the lead agency does not require this measure the Final EIR should provide an analysis in the Final EIR that demonstrates peak daily emissions without air pollution controls at the project site or failed controls.

#### Greenhouse Emissions

6. On page 5-27 of the Draft EIR the lead agency presents a significant greenhouse gas emissions impact (41,000 metric tons per year of CO<sub>2</sub> emissions) from the proposed project. However, the lead agency does not provide any data in the Appendix of the Draft EIR that demonstrates the sources used to derive the aforementioned CO<sub>2</sub> emissions value. Therefore, the AQMD staff recommends that the lead agency provide additional data and analyses (emission factors, assumptions, etc) in the Final EIR that demonstrates the significant impact from the project's greenhouse gas emissions (GHG). Further, the lead agency should discuss how biogenic emissions from the project have been addressed in Final EIR.