



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mr. Jose Merlan, Urban/Regional Planner III  
Riverside County Department of Waste Resources  
14310 Frederick Street  
Moreno Valley, CA 92553

**Mitigated Negative Declaration (MND) for the Proposed  
Robert A. Nelson Transfer Station/Materials Recovery (RAN TS/MRF) Facility Improvements  
Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

The proposed project would replace the existing static pile and pilot aerated static pile compost systems with a GORE Cover Compost System, install a food waste processing unit in the transfer station, and construct an underground storm water infiltration system for the compost area at the facility. The project site is currently permitted for processing 4,000 tons/day of construction/demolition, green materials, inert, metals, mixed municipal, and wood waste. Other SCAQMD permitted activities include chipping and grinding, CDI debris processing, composting, and waste tire storage. Applications for the existing composting system and biofilter at this site are under review by the SCAQMD Engineering and Permitting (E&P) staff. A separate green waste processing facility, CST Organic Recycling (Facility ID 182206), has 10 permit applications: five applications for green waste screeners and five for corresponding IC engines. Since the proposed project may require permits from SCAQMD, SCAQMD should be identified as a responsible agency for the proposed project. Additionally, after a review of the air quality analysis in the MND, SCAQMD staff has comments on the air quality analysis. Details are included in the attachment.

SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR, at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

JW:LS:JC

ORC170307-08

Control Number

**ATTACHMENT**Air Quality Analysis

1. The Lead Agency stated in the MND that the proposed project would not increase the daily refuse tonnage received and processed at the RAN TS/MRF because the proposed project involves a change in composting technology. However, the proposed project will generate slurry, which may require pumping and transportation to an offsite location. Based on a review of the output files, SCAQMD staff found that pumping and hauling emissions were not included in the emission calculations. The MND has likely underestimated the project's air quality impacts. The SCAQMD staff recommends calculating emissions from the pumping and hauling of slurry and including them in the Final MND.
2. Page 30 – The Compliance Test Protocol referenced A/N 559590 has been reviewed by SCAQMD Source Test (PR 15167A – memo dated 04/19/16). A review of the memo indicated that recalculating the test results for all emissions was necessary due to the use of an incorrect reference factor in the original calculation. Since Table 4, *Compost Emissions*, on page 34 in the MND is copied from the source test report, the emissions reported in Table 4 may be inaccurate. Therefore, the SCAQMD staff recommends that the Lead Agency correct the emission calculations and revise Table 4 in the Final MND.

Compliance with SCAQMD Rules

3. The Lead Agency should include a discussion in the Final MND to demonstrate compliance with the following SCAQMD rules:
  - Rule 212 – Standards for Approving Permits and Issuing Public Notice
  - Rule 401 – Visible Emissions
  - Rule 402 – Nuisance
  - Rule 403 – Fugitive Dust
  - Rule 405 – Solid Particulate Matter - Weight
  - Rule 1133 – Composting and Related Operations – General Administrative Requirements
  - Regulation 13 – New Source Review
  - Rule 1401 – New Source Review of Toxic Air Contaminants

SCAQMD Permits

4. The proposed project may require the submittal of complete and timely permit/plan applications for the followings:
  - An aerated static pile composting system (GORETEX cover).
  - Food waste processing unit, if not exempt per Rule 219.
  - Storm water collection/storage/treatment system, if not exempt per Rule 219.
  - Any Trommel Screens and/or grinders that have not yet been applied for.
  - Any IC engines greater than 50 HP powering the screens and grinders, not used for propulsion, that have not yet been applied for.

Any questions on permits can be directed to the SCAQMD's E&P staff at (909) 396-3385.

Other Comments

5. Page 30 – The Compliance Test Protocol referenced in the second paragraph is incorrect. The correct Application No. (A/N) should read: 559590.
6. Page 36 – Section 3e states that the RAN TS/MRF has not received any odor complaints or citations by any regulatory agencies. Based on a review of the SCAQMD records, SCAQMD staff found that the RAN facility (FID #164512 – Agua Mansa MRF) had been identified as the alleged source of twenty (20) dust and odor complaints since January 1, 2016. For additional information on

compliance, please refer to the SCAQMD web site, at:  
<http://www3.aqmd.gov/webappl/fim/prog/search.aspx>.

7. On page 37 of the MND, the Lead Agency found that odors would not be expected from the proposed project based on a comparison to the West Valley MPF. The West Valley MRF is situated in a similar industrialized environment and has never had an odor problem or complaint while operating under similar conditions and compost system. The SCAQMD staff believes that this comparison is improper since facility specific details, such as meteorology, terrain, building downwash, temperature, population density, sensitive receptor location, waste material composition etc., are all variables that may contribute to different odor scenarios at this project site. Therefore, it is recommended that the Lead Agency revise the odor analysis and provide substantial evidence in the Final MND to support that the comparison between the proposed project and the West Valley MRF is reasonable.