



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mr. John Arnau, CEQA & Habitat Program Manager
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Negative Declaration (ND) for the Proposed Renewable Natural Gas Facility at Prima Deshecha Landfill

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 ND.

The Lead Agency proposes to install a Renewable Natural Gas (RNG) facility to turn landfill gas (LFG) into a renewable compressed natural gas (CNG) for use as transportation fuel. The transportation fuel will be loaded into tube trailers at an on-site time-fill fueling station for delivery to an existing off-site facility. The proposed project would generate sufficient CNG to fuel up to approximately 130 vehicles per day and three daily tube trailer truck roundtrips during operation. The nearest sensitive receptors are residential uses, which are approximately 1,100 feet west of the proposed project site. SCAQMD Rule 1113 (Architectural Coatings), Rule 402 (Nuisance), and Rule 403 (Fugitive Dust) were discussed in the ND. Since the proposed project requires upgrades and modifications to the landfill gas system (permit to operate/permit modification) and excavation at the landfill (landfill excavation plan), SCAQMD should be identified as a responsible agency for the proposed project. If there are permitting questions, they can be directed to Engineering and Permitting Staff at (909) 396-3385. Additionally, the Lead Agency should include a discussion in the Final ND to demonstrate compliance with the following SCAQMD rules:

- Rule 212 – Standards for Approving Permits and Issuing Public Notices
- Rule 401 – Visible Emissions
- Rule 403 – Fugitive Dust
- Rule 302 – Fees for Publication
- Rule 1150 – Excavation of Landfill Sites
- Regulation 13 – New Source Review
- Rule 1401 – New Source Review of Toxic Air Contaminants

The 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 at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final ND associated with this project.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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Control Number