



South Coast Air Quality Management District

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Revised Mitigated Negative Declaration (Revised MND) for the Proposed Recycle City Solid Waste Facility Permit Revision Project

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration (Final MND).

Project Description

The Lead Agency proposes to modify an existing Solid Waste Facility Permit (SWFP) by including the processing of municipal solid waste (MSW) at the site (“proposed project”). The existing permit allows the processing of construction, demolition, and inert (CDI) materials, including green materials, with a maximum processing capacity of 3,000¹ tons per day (TPD). The Lead Agency does not propose any changes to the capacity or the operation schedule. Additionally, the proposed project would include the construction of a new building and excavation for a sub-surface loadout tunnel on seven acres.

Background on SCAQMD Staff’s Involvements

On October 18, 2016, the Lead Agency released the MND for a 30-day public review and comment period. On November 17, 2016, SCAQMD staff provided comments on the MND². On March 9, 2017, the Lead Agency provided responses to the SCAQMD staff comments on the MND. The Lead Agency also provided the SCAQMD staff with a Revised MND, including a revised Appendix A, *Air Quality Impact Analysis and Air Toxics Risk Assessment* for review before final disposition of the MND. Additionally, the Lead Agency is coordinating with the SCAQMD’s Engineering and Permitting staff (hereinafter referred to collectively as “SCAQMD staff”) for questions on the SWFP. Based on a review of the Revised MND, revised Appendix A, and the responses to the comments on the MND, SCAQMD staff has further comments as follow:

¹ To view the current Solid Waste Facility Permit issued February 26, 2008, please visit: <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-1077/Detail/>.

² SCAQMD. November 17, 2016. Control number LAC161021-06. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2016/november/mndrecyclecityswfprevision.pdf?sfvrsn=4>.

Air Quality Analysis – Construction Emissions in Pounds per Day (lbs/day)

Based on a review of Table 1, *Project Construction Emissions*, on Page 18 of the Revised MND and Table 3-15, *Project Construction Emissions*, of revised Appendix A, the SCAQMD staff found that project construction emissions were presented in tons per year. The SCAQMD's CEQA regional significance thresholds are based on pounds per day. When emissions are estimated in tons per year, the emissions are averaged over that period, which can result in an under-estimation of the project's air quality impacts. Therefore, the SCAQMD staff recommends that the Lead Agency present the construction emissions in pounds per day and compare them to the SCAQMD's CEQA regional significance thresholds in the Final MND and the associated final Appendix A.

Air Quality Analysis – Operational Emissions from Increased Truck Vehicle Miles Traveled

In the Revised MND (Page 19), the Lead Agency found that the project's operational emissions would not exceed the SCAQMD's CEQA thresholds of significance. Based on a review of the revised Appendix A³ and the Lead Agency's responses to the SCAQMD staff comments on the MND⁴, the SCAQMD staff found that a 1.4-mile travel distance to and from the Long Beach Freeway was used to estimate operational emissions. The revised Air Quality analysis did not calculate the project's operational emissions from the distances traveled by the Solid Waste Collection Vehicles (SWCVs) and transfer trucks to and from the project site⁵, which has likely caused the project's air quality impacts to be underestimated. Therefore, the SCAQMD staff recommends that the Lead Agency estimate the mileage from SWCVs and transfer truck trips and include the emissions in the quantification of operational emissions in the Final MND.

SCAQMD Rule 410 – Odors From Transfer Stations and Material Recovery Facilities

The proposed project is subject to the requirements of SCAQMD Rule 410⁶. The SCAQMD staff considers the proposed change to the existing SWFP as triggering the "modified facility" requirements set forth in SCAQMD Rule 410, and that the proposed enclosure is required to meet the design and ventilation requirements of SCAQMD Rule 410. Compliance with the requirements is effective at the time of issuance of the revised SWFP. Upon a review the Revised MND, the SCAQMD staff found that the Revised MND did not address the building and ventilation requirements for a modified facility that are in SCAQMD Rule 410 (d)(1). Nor were any possible exemptions from the requirements in Rule 410(e)(2) discussed. Unless exempt, the Final MND should describe how the building will be designed to comply with SCAQMD Rule 410(d)(1), including both the limited ranges allowed for building openings (2 to 5%) and inlet face velocities (100 to 200 feet per minute). In order to meet the inlet face velocities, the Final MND should discuss the sizes of fans/blowers that would be necessary, along with the associated increase energy usage at the facility. Additionally, the Final MND should identify SCAQMD as a responsible agency.

³ See also Revised Air Quality Impact Analysis and Air Toxics Risk Analysis (SCS Engineers, January 2017), Page 15.

⁴ Responses to Comments: SCAQMD Staff Comment Number 4-11.

⁵ As described in the SCAQMD Staff Comment Number 4-11, it was requested that the Lead Agency specify the distances for both SWCVs and transfer trucks. The Lead Agency responded that the proposed project would serve the Los Angeles County area. However, the actual distances assumed from the increased number of waste collection and transfer trucks were not disclosed in the Revised MND or the revised Appendix A. Based on the SCAQMD staff's estimate, distances to and from the project site in the Los Angeles County vary greatly and may be as far as 70 miles to the County boundaries.

⁶ SCAQMD Rule 410 - Odors from Transfer Stations and Material Recovery Facilities.

SCAQMD staff reviewed the Alternative Odor Management Plan (AOMP) that was attached in the Revised MND. In the AOMP, the Lead Agency discussed the installation and use of misters as odor management methods. The SCAQMD staff recommends the Final MND include a discussion on the amount of potable water that will be required for the misting systems. Additionally, similar facilities have utilized odor neutralizers or other additives instead of misters for managing odors. Odor neutralizers⁷ or other additives may contain Volatile Organic Compounds (VOCs) and toxic compounds. If using these products are reasonably foreseeable odors management methods for the proposed project, and to facilitate a good-faith effort at full disclosure during the CEQA process (CEQA Guidelines Section 15003(i)), the Lead Agency should calculate the air emissions and include them in the project's operational emissions in the Final MND.

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 air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist, CEQA-IGR Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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⁷ The odor neutralizing products used in the odor misting system should have no adverse environmental impacts. The formulations should be free of toxic compounds, VOC, and fragrance. Many products available in the market attempt to mask odors with fragrances, which can also result in odor complaints