



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Negative Declaration (ND) for the Proposed San Timoteo Sanitary Landfill Solid Waste Facility Permit Revision and Joint Technical Document Amendment Project

The South Coast Air Quality Management District (SCAQMD) staff 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 CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to divert 1,000 tons per day of refuse from Mid-Valley Sanitary Landfill to San Timoteo Sanitary Landfill for a maximum of 15 days per year (proposed project). The project is located at 31 Refuse Road on the southwest corner of San Timoteo Canyon Road and Palomares Road in the city of Redlands.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined that the proposed project would have less than significant impacts to regional and localized air quality during operation.¹ SCAQMD staff has comments regarding the air quality analysis and applicable SCAQMD permits, rules, and regulations. Please see SCAQMD staff's detailed comments below.

SCAQMD Staff's Comments

Air Quality Analysis

The lead agency found that there will be an increase in landfill gas generation and an increase in landfill gas combustion at San Timoteo Sanitary Landfill due to the additional refuse that the facility will receive. The calculated emissions increase listed in Table 8 - Landfill Flare Emissions appear to be based on existing permitted emission limits and a landfill gas flow rate increase of 7.4 cubic feet per minute (cfm). It is not clear to SCAQMD staff how the 7.4 cfm landfill gas flow rate was derived and why it was used for the emissions increase assessment given that Appendix B - Landgem Report indicates that a maximum yearly average landfill gas flow rate increase of 230 cfm is expected by year 2040.² Therefore, the lead agency should either revise the emission calculations to include the maximum landfill gas flow rate or explain the gas flow rate used to calculate the proposed project's operational emissions.

Applicable SCAQMD Permits, Rules, and Regulations

The proposed landfill expansion, resulting in an increase of landfill gas being generated and collected, may require alterations to the existing landfill gas and condensate/leachate collection and storage systems. Prior to the installation of new equipment and/or the relocation or modification of existing equipment, a

¹ Negative Declaration, Page 31.

² Air Quality and Greenhouse Gas Technical Report, Page 130 & 133.

SCAQMD permit to construct and a permit to operate may be required. If a SCAQMD permit is required, the SCAQMD should be identified as a responsible agency in the final CEQA document. Additionally, if the proposed expansion requires any landfill excavation activities, a complete and timely Rule 1150 Landfill Excavation Plan shall be submitted to the SCAQMD. Other applicable rules and regulations most pertinent to the project may include, but are not limited to, the following:

- Rule 201
- Rule 203
- Rule 212
- Rule 401
- Rule 402
- Rule 403
- Rule 404
- Rule 1150.1
- Regulation 13
- Rule 1401
- Regulation 30 (Title V)
- 40 CFR 60 Subpart XXX

For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Permitting questions can be directed to SCAQMD Engineering and Permitting staff at (909) 396-3385.

Response to Comments

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. When responding to issues raised in the comments, response should provide sufficient details 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 or useful to decision makers and the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/AS/AM
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