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South Coast Air Quality Management District



**BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

In the Matter of

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

vs.

LAGUNA CORONA, LLC; ADGER FAMILY
TRUST dba CREEKSIDE MOBILE ESTATES;
JOHN ADGER; J & H ASSET PROPERTY
MGT., INC.
[Facility ID#189227]

Respondents.

Case No. 6272-1

**FIRST AMENDED PETITION FOR AN
ORDER FOR ABATEMENT**

District Rule 203

Hearing Date: September 23, 2025

Originally set for August 12, 2025

Time: 9:30 a.m.

Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

South Coast Air Quality Management District, (hereinafter referred to as "South Coast AQMD", "District", or "Petitioner") petitions the South Coast Air Quality Management District Hearing Board ("Hearing Board") for an Order for Abatement directed to Laguna Corona, LLC, Adger Family Trust dba Creekside Mobile Estates, John Adger, and J & H Asset Property MGT., Inc. (hereinafter referred to as "Respondents"), with regard to the operation of an unpermitted¹ wastewater treatment plant at a residential mobile home park, located at 21650 Temescal Canyon

¹ Unpermitted by South Coast AQMD. Facility has permits from California Regional Water Quality Control Board, Santa Ana Region ("Water Board").

1 Road, Corona, CA 92883. The District alleges as follows:

2 1. Petitioner is a body corporate and politic established and existing pursuant to Health
3 and Safety Code section 40000, et seq. and section 40400, et seq., and is the sole and exclusive local
4 agency with the responsibility for comprehensive air pollution control in the South Coast Air Basin.

5 2. Respondents own, operate, and manage a wastewater treatment plant facility that
6 processes the sewage from a 92-space mobile home park without a valid District Permit to Operate
7 within the District's jurisdiction and subject to the District's regulations.

8 3. On information and belief, the Adger Family Trust owns and operates the 92-space
9 mobile home park located at 21650 Temescal Canyon Road, Corona, CA 92883.

10 4. On information and belief, J & H Asset Property MGT., Inc., a California corporation,
11 manages the wastewater treatment plant facility within the mobile home park located at 21650
12 Temescal Canyon Road, Corona, CA 92883.

13 5. John Adger acted on behalf of the Adger Family Trust and Laguna Corona, LLC
14 during the relevant times alleged in this petition.

15 6. On information and belief, the Adger Family Trust transferred the mobile home park
16 property to Laguna Corona, LLC, a Wyoming incorporated limited liability company that is believed
17 to be owned and operated by the Adger Family Trust. Laguna Corona, LLC has not registered with
18 the California Secretary of State.

19 7. **District Rule 203(a)**, in relevant part, prohibits the operation of any equipment the
20 use of which may cause or control the issuance of air contaminants into the atmosphere without first
21 obtaining a written permit to operate from the District's Executive Officer.

22 8. Respondents are currently in violation of District Rule 203, in that Respondents do
23 not have a permit to operate equipment which causes or controls the issuance of air contaminants
24 into the atmosphere.

25 9. **District Rule 102** and **Health and Safety Code section 39013** define air
26 contaminants or air pollutants as "any discharge, release, or propagation," including "fumes, gases,
27 [and] odors."

28 10. Beginning on or about November 26, 2018, the District received the first of several

1 complaints alleging a strong sewage odor coming from within Creekside Mobile Estates, the mobile
2 home park located at 21650 Temescal Canyon Road, Corona, CA 92883.

3 11. On subsequent inspections of Creekside Mobile Estates, a District inspector learned
4 the mobile park has a wastewater treatment plant operated onsite.

5 12. The District inspector learned the following about the wastewater treatment plant:
6 sewage is treated through a biological process using the material and aeration; activated sludge is
7 treated with air; there are controls within the facility to adjust air as part of the operation; there is a
8 clarifier separating the sludge that is settled; there is a storage pond; and as a small plant, it lacks
9 backup power, such that when there are power outages of 10 or 12 hours, the raw sewage can back
10 up, and when power is restored, then sewage rushes in, and could potentially be a cause of odors.

11 13. On January 11, 2019, the District inspector was granted permission to enter the
12 community wastewater treatment plant. During the inspection the inspector observed or learned the
13 following:

- 14 • Water flows into a large tank and is treated with an aeration process.
- 15 • The last section of the tank acts as a primary clarifier.
- 16 • When water rushes in, all the sewage and rags are trapped in grit trap, which is
17 connected to an air compressor. The air compressor blows air aggressively
18 through the grit trap to rip the rags into fine pieces.
- 19 • The facility used Skunky Pump, a contractor, to transport thickened sludge and
20 rags.
- 21 • The contractor typically comes to the park every six months to remove sludge and
22 rags.
- 23 • The facility processes approximately 10,000 gal/day².
- 24 • After the primary clarifier area, the facility pumps water into percolation ponds,
25 alternating between two ponds.
- 26 • Allegedly the operator collects samples of wastewater daily to determine if

27
28 ² According to Order No. 98-31 from the Water Board, the wastewater plant is designed to treat an
average of 22,500 gallons per day.

1 additional air needs to be added to the system, and a certified laboratory picks up
2 a sample for analysis.

3 • Between 4:30-5:00 pm is peak time and the facility cannot control the water. The
4 water comes in high, and the flow loads the plant, which takes a while to process.

5 • The facility has an overflow basin.

6 14. On January 18, 2019, the District inspector issued a Notice to Comply to the on-site
7 manager, requesting the facility apply for valid South Coast AQMD permits for operation of a
8 wastewater plant. The notice was provided in an email with a link to South Coast AQMD Permit
9 Applications and a phone number for South Coast AQMD Permit Services.

10 15. The District continued to receive odor complaints.

11 16. On August 1, 2019, the District inspector spoke with Mr. John Adger via telephone
12 about the requested South Coast AQMD Permit.

13 17. After several months, no South Coast AQMD Permit was sought, and on April 17,
14 2020, the District issued Notice of Violation P72909 for violation of South Coast AQMD Rule
15 203(a). (A true and correct copy of Notice of Violation P72909 is attached hereto as Attachment 1.)

16 18. Despite there being an ongoing violation (operating without a permit), the facility
17 took no action to obtain a South Coast AQMD Permit.

18 19. On June 2, 2023, District inspectors arrived at the facility to attempt to conduct a
19 follow-up inspection. The clubhouse where the manager's office is located was empty, and the
20 inspectors were unable to contact the manager. A District inspector left a voice message on the phone
21 number listed at (951) 277-9095. Additionally, the inspector left a message on an emergency phone
22 number listed at (877) 569-8733. The inspector did not receive a callback from either phone number.

23 20. On August 30, 2023, a District inspector performed a search of South Coast AQMD
24 Clean Air Support System (CLASS) Compliance 32 and Permit Administration and Application
25 Tracking System (PAATS) and found there were still no permits or permit applications submitted
26 for wastewater treatment equipment for the facility.

27 21. On August 31, 2023, District inspectors performed a follow-up inspection. The
28 inspectors met with Mr. Adger at the wastewater treatment area to perform the inspection. While at

1 the facility, the inspector asked the onsite manager if she had access to all emails in the email inbox
2 for the facility and asked her to search for Notice of Violation P72909. They located the email on
3 the computer at the clubhouse and the inspector redirected the manager on where she can locate the
4 permit applications and provided a link and phone number for South Coast AQMD Permit Services.

5 22. On August 31, 2023, a District inspector issued Notice of Violation P72944 for
6 violation of South Coast AQMD Rule 203(a). The notice was personally served to the onsite manager
7 and John Adger. (A true and correct copy of Notice of Violation P72944 is attached hereto as
8 Attachment 2.)

9 23. On September 19, 2023, the Adger Family Trust submitted an application for a South
10 Coast AQMD permit (A/N 647235). The responsible official listed on the application was Manager,
11 Valerie Battest, who is believed to be an employee of Respondent, J & H Asset Property MGT., Inc.
12 (A true and correct copy of A/N 647235 is attached hereto as Attachment 3.)

13 24. On November 2, 2023, the South Coast AQMD engineer responsible for reviewing
14 the permit application notified the facility that A/N 647235 was being rejected, because it did not
15 contain sufficient information to be deemed complete, thus was rejected pursuant to Rule 210. She
16 provided this notice by email and letter. (A true and correct copy of the email and attached rejection
17 letter is attached hereto as Attachment 4.)

18 25. On December 6, 2023, a District inspector performed a follow-up inspection,
19 confirming the facility was still operating and had not resubmitted a permit application.

20 26. On December 6, 2023, the District issued Notice of Violation P75868 for violation
21 of South Coast AQMD Rule 203(a). (A true and correct copy of Notice of Violation P75868 is
22 attached hereto as Attachment 5.)

23 27. On or about March 15, 2024, the mobile home park was transferred from the Adger
24 Family Trust to Laguna Corona, LLC.

25 28. On information and belief, Laguna Corona, LLC is owned and operated by the Adger
26 Family Trust or individual Adger family members.

27 29. On May 22, 2024, the District issued Notice of Violation P72950 for violation of
28 South Coast AQMD Rule 203(a). (A true and correct copy of Notice of Violation P72950 is attached

1 hereto as Attachment 6.)

2 30. From May 28, 2024, to July 19, 2024, there were several emails and telephone calls
3 involving Mr. John Adger and District engineering and enforcement staff, providing guidance on
4 applying for the required permit. On at least two occasions, in email correspondence, Mr. Adger
5 claimed the facility was exempt under Rule 219(D)(16)(P) or Rule 1176, citing (c)(24), (i), and
6 (i)(5)(k), and District staff responded each time with why the facility was not exempt. The cited
7 exemptions are only relevant to industrial wastewater processes.

8 31. On July 19, 2024, the District issued Notice of Violation P73636 for violation of
9 South Coast AQMD Rule 203(a). (A true and correct copy of Notice of Violation P73636 is attached
10 hereto as Attachment 7.)

11 32. On August 9, 2024, the District issued Notice of Violation P73637 for violation of
12 South Coast AQMD Rule 203(a). (A true and correct copy of Notice of Violation P73637 is attached
13 hereto as Attachment 8.)

14 33. District staff have been patient with the Respondents, providing multiple
15 opportunities to voluntarily comply with South Coast AQMD's permitting requirements. The
16 District issued six Notices of Violations related to the facility continuing to violate Rule 203.

17 34. Despite not having a District Permit to Operate, Respondents continue to operate the
18 wastewater treatment plant facility in violation of District rules.

19 35. The District, by this petition, seeks an Order for Abatement to require Respondents
20 to cease violating District rules by operating wastewater treatment plant facility without a valid
21 District Permit to Operate.

22 36. It is not unreasonable to require Respondents to comply with District rules and
23 regulations.

24 37. The issuance of an Order for Abatement upon a fully noticed hearing would not
25 constitute a taking of property without due process of law.

26 38. This Order for Abatement is not intended to be nor does it act as a variance.

27 39. The issuance of the prayed for Order for Abatement is not expected to result in the
28 closing or elimination of an otherwise lawful business, such closing or elimination would not be

1 without a corresponding benefit in reducing air contaminants.

2 40. It is the District's intention to file a proposed Findings and Decision a few days in
3 advance of the hearing

4 WHEREFORE, the District prays for an Order for Abatement as follows:

5 1. That this Hearing Board issue an Order for Abatement requiring Respondents to cease
6 and desist from operating its wastewater treatment plant facility in a manner which violates District
7 Rule 203(a), or, in the alternative, to comply with increments of progress and conditions as the
8 Hearing Board deems appropriate.

9 2. For such other and further relief that this Board deems just and proper.

10 Dated: July 31, 2025,

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT



NICHOLAS P. DWYER
Senior Deputy District Counsel
Attorney for Petitioner

ATTACHMENT 1



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 72909

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	31	2019

Facility Name: Creekside mobile Estates		Facility ID#: 189227	Sector: EO
Location Address: 21650 Temescal canyon Rd.		City: CORONA	Zip: 92883
Mailing Address: 21650 Temescal canyon Rd.		City: CORONA	Zip: 92883

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	203 (a)			Failure to obtain South coast AQMD Permits to operate (P/O) for waste water treatment equipment.
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Karen Owen/ John Adger	Phone: 951-277-9095	Served By: Alisha Lewis	Date Served: 07-17-20
Title: Manager/ owner	Email: creekside@jandhmgmt.com johnadg1000@gmail.com	Phone No: <input checked="" type="checkbox"/> 909-396-2171 <input type="checkbox"/> 310-233-	Email: a.lewis@aqmd.gov

*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations	Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail
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ORIGINAL

ATTACHMENT 2



South Coast Air Quality Management District
21565 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 72944

DATE OF VIOLATION		
Month	Day	Year
07	31	2019

Facility Name	CREEKSIDE MOBILE ESTATES			Facility ID#	189227	County	EO
Location Address	21650 Temescal canyon Rd.		City	CORONA	Zip	92883	
Mailing Address	21650 Temescal canyon Rd.		City	CORONA	Zip	92883	

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	203(a)			FAILURE to obtain south coast AQMD permits to operate (P/O) for waste water treatment equipment
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To	John Adger / Vainie Batteest	Phone	951-277-9095	Served By	Alisha Lewis	Date Notice Served	08-31-23
Title	owner/ manager	Email	Creekside@jandhngt.com johnadger@jandhngt.com	Phone No.	<input checked="" type="checkbox"/> 909-396-2171 <input type="checkbox"/> 310-233-	Email	alewis@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail

ORIGINAL

ATTACHMENT 3



South Coast Air Quality Management District

Form 400-A**Application Form for Permit or Plan Approval**

List only one piece of equipment or process per form.

Mail To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944Tel: (909) 396-3385
www.aqmd.gov**Section A - Operator Information**

1. Facility Name (Business Name of Operator to Appear on the Permit):

Creekside Estates

2. Valid AQMD Facility ID (Available On
Permit Or Invoice Issued By AQMD):

189227

3. Owner's Business Name (If different from Business Name of Operator):

Adger Family Trust

Section B - Equipment Location Address4. Equipment Location Is: ☒ Fixed Location ☐ Various Location
(For equipment operated at various locations, provide address of initial site.)

21650 Temescal Cyn. Rd.

Street Address

Corona

, CA 92883

City

Zip

John/ Valerie

Manager /operator

Contact Name

Title

(714) 928-1000

Phone #

Ext.

Fax #

E-Mail: johnhaywood1000@yahoo.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:

☒ Check here if same as equipment location address

21650 Temescal Cyn. Rd.

Address

Corona

, CA 92883

City

State

Zip

John/ Valerie

Manager /operator

Contact Name

Title

(714) 928-1000

Phone #

Ext.

Fax #

E-Mail: johnhaywood1000@yahoo.com

Section D - Application Type

6. The Facility Is:

☒ Not In RECLAIM or Title V☐ In RECLAIM☐ In Title V☐ In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application:

- ☐ New Construction (Permit to Construct)
☐ Equipment On-Site But Not Constructed or Operational
☐ Equipment Operating Without A Permit *
☐ Compliance Plan
☐ Registration/Certification
☐ Streamlined Standard Permit

7c. Equipment or Process with an Existing/Previous Application or Permit:

- ☒ Administrative Change
☐ Alteration/Modification
☐ Alteration/Modification without Prior Approval *
☐ Change of Condition
☐ Change of Condition without Prior Approval *
☐ Change of Location
☐ Change of Location without Prior Approval *
☐ Equipment Operating with an Expired/Inactive Permit *

Existing or Previous
Permit/ApplicationIf you checked any of the items in
7c., you MUST provide an existing
Permit or Application Number:

189227

7b. Facility Permits:

- ☐ Title V Application or Amendment (Refer to Title V Matrix)
☐ RECLAIM Facility Permit Amendment

* A Higher Permit Processing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(i)).

8a. Estimated Start Date of Construction (mm/dd/yyyy):

8b. Estimated End Date of Construction (mm/dd/yyyy):

8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):

10. For identical equipment, how many additional
applications are being submitted with this application?
(Form 400-A required for each equipment / process)

0

11. Are you a Small Business as per AQMD's Rule 102 definition?
(10 employees or less and total gross receipts are
\$500,000 or less OR a not-for-profit training center)☐ No ☒ Yes12. Has a Notice of Violation (NOV) or a Notice to
Comply (NC) been issued for this equipment?
If Yes, provide NOV/NC#:☐ No ☐ Yes**Section E - Facility Business Information**

13. What type of business is being conducted at this equipment location?

Water treatment

14. What is your business primary NAICS Code?
(North American Industrial Classification System)15. Are there other facilities in the SCAQMD
jurisdiction operated by the same operator?☒ No ☐ Yes16. Are there any schools (K-12) within
1000 feet of the facility property line?☒ No ☐ Yes**Section F - Authorization/Signature**

I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official:

Valerie Battest

18. Title of Responsible Official:

Manager

19. I wish to review the permit prior to issuance.
(This may cause a delay in the
application process.)☐ No
☐ Yes

20. Print Name:

Valerie Battest

21. Date:

09/10/2023

22. Do you claim confidentiality of
data? (If Yes, see instructions.)☐ No ☐ Yes

23. Check List:

☒ Authorized Signature/Date☒ Form 400-CEQA☒ Supplemental Form(s) (ie., Form 400-E-xx)☒ Fees EnclosedAQMD
USE ONLYAPPLICATION TRACKING #
64723CHECK #
1190AMOUNT RECEIVED
\$ 2298.52PAYMENT TRACKING #
16577VALIDATION
9/15/23

DATE

APP
REJ

DATE

APP
REJ

CLASS

I III

BASIC
CONTROL

EQUIPMENT CATEGORY CODE

TEAM

ENGINEER

REASON/ACTION TAKEN



South Coast Air Quality Management District
Form 400-CEQA
California Environmental Quality Act (CEQA) Applicability

Mail To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944

Tel: (909) 396-3385
www.aqmd.gov

The SCAQMD is required by state law, the California Environmental Quality Act (CEQA), to review discretionary permit project applications for potential air quality and other environmental impacts. This form is a screening tool to assist the SCAQMD in clarifying whether or not the project ¹ has the potential to generate significant adverse environmental impacts that might require preparation of a CEQA document [CEQA Guidelines § 15060(a)]. Form 400-CEQA and the instructions for guidance on completing this form are available at <http://www.aqmd.gov/home/regulations/ceqa/ceqa-permit-forms> or <http://www.aqmd.gov/home/permits/permit-application-forms>. For each Form 400-A application, also complete and submit one Form 400-CEQA. If submitting multiple Form 400-A applications for the same project at the same time, only one Form 400-CEQA is necessary for the entire project. If you need assistance completing this form, contact Permit Services at (909) 396-3385.

Section A – Facility Information

1. Facility Name (Business Name of Operator to Appear on the Permit):

Creekside Estates

2. SCAQMD Facility ID:

189227

3. Project Description:

Water Treatment

Section B – Review For Exemption From Further CEQA Action

Check "Yes" or "No" as applicable. If "Yes" is checked for any question in Section B, skip Section C and proceed to page 2 and complete Section D - Signatures.

	Yes	No	Is this application for:
1.	<input checked="" type="radio"/>	<input type="radio"/>	A request for a change of operator only (without equipment or process change modifications)?
2.	<input type="radio"/>	<input checked="" type="radio"/>	A functionally identical permit unit replacement with no increase in equipment unit rating or emissions?
3.	<input type="radio"/>	<input checked="" type="radio"/>	A change of daily VOC permit limit to a monthly VOC permit limit?
4.	<input type="radio"/>	<input checked="" type="radio"/>	Equipment damaged as a result of a disaster during state of emergency?
5.	<input type="radio"/>	<input checked="" type="radio"/>	A Title V (e.g., SCAQMD Regulation XXX) permit renewal without equipment or process change modifications?
6.	<input type="radio"/>	<input checked="" type="radio"/>	A Title V administrative permit revision?
7.	<input type="radio"/>	<input checked="" type="radio"/>	The conversion of an existing permit into an initial Title V permit?

Section C – Review of Impacts Which May Trigger Further CEQA Review

Check "Yes" or "No" as applicable. To avoid delays in processing your application(s), explain all "Yes" responses on a separate sheet and attach it to this form.

	Yes	No	
1.	<input type="radio"/>	<input checked="" type="radio"/>	Is this project specifically evaluated in a previously certified or adopted CEQA document? If "Yes" is checked, attach a copy of the signed Notice of Determination to this form.
2.	<input type="radio"/>	<input checked="" type="radio"/>	Is this project specifically exempted from CEQA by another entity (e.g., city or agency)? If "Yes" is checked, attach a copy of the signed Notice of Exemption or other documentation from the entity to this form.
3.	<input type="radio"/>	<input checked="" type="radio"/>	Is this project part of a larger project? If "Yes" is checked, attach a separate sheet to briefly describe the larger project.
4.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project increase the QUANTITY of hazardous materials stored aboveground onsite or transported by mobile vehicle to or from the site by greater than or equal to the amounts associated with each compound listed on Form 400-CEQA, Table 1 - Regulated Substances List and Threshold Quantities for Accidental Release Prevention [http://www.aqmd.gov/home/regulations/ceqa/ceqa-permit-forms]? If "Yes" is checked, attach a separate sheet to identify each hazardous material and corresponding quantity to be transported, stored, or used.
5.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project emit any air toxic listed on Form 400-CEQA, Table 2 - Other Air Toxics and Their Screening Levels [http://www.aqmd.gov/home/regulations/ceqa/ceqa-permit-forms]? If "Yes" is checked, attach a separate sheet to identify each air toxic and corresponding quantity to be emitted.
6.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project require any demolition, excavation, and/or grading construction activities that encompass an area exceeding 20,000 square feet?

¹ A "project" means the whole of an action which has a potential for resulting in physical change to the environment, including construction activities, clearing or grading of land, improvements to existing structures, and activities or equipment involving the issuance of a permit. For example, a project might include installation of a new, or modification of an existing internal combustion engine, dry cleaning facility, boiler, gas turbine, spray coating booth, solvent cleaning tank, etc.

² Form 400-CEQA, Table 2 - Other Air Toxics and Their Screening Levels, contains a list of air toxics that either do not have a cancer potency (CP) or reference exposure level (REL) approved by the Office of Environmental Health Hazards Assessment (OEHA) or have a combination of OEHA-approved and non-approved CPs or RELs.

Section C – Review of Impacts Which May Trigger Further CEQA (concluded)

	Yes	No	
7.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project utilize a boiler, engine, or other combustion equipment that uses fuel (e.g., gasoline, diesel, natural gas, liquefied petroleum gas (LPG), or landfill gas)? If "Yes" is checked, then the applicant will need to calculate the amount of GHGs from fuel use via on the Greenhouse Gas (GHG) online estimator (http://www.aqmd.gov/home/regulations/ceqa/ceqa-permit-forms), and attaching the printout or by conducting hand calculations and providing the documentation. Refer to the Instructions for Form 400-CEQA for guidance.
8.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project utilize other types of equipment not addressed in Question 7 that require the use of, or will generate, any chemicals listed on Form 400-CEQA, Table 3 - Greenhouse Gases (http://www.aqmd.gov/home/regulations/ceqa/ceqa-permit-forms)? If "Yes" is checked, attach a separate sheet to identify each equipment unit, the chemical name(s), and the quantity of each chemical identified.
9.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project include the open outdoor storage of dry bulk solid materials that could generate dust? If "Yes" is checked, include a plot plan with the application package.
10.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project result in or make worse noticeable off-site odors from activities that may not be subject to SCAQMD permit requirements? For example, landfills, materials recovery/recycling facilities (MRF), and compost materials or other types of greenwaste (e.g., lawn clippings, tree trimmings, etc.) have the potential to generate odor complaints subject to SCAQMD Rule 402 – Nuisance.
11.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project cause an increase of emissions from marine vessels, trains and/or airplanes?
12.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project increase demand for potable water at the facility by more than 262,820 gallons per day? The following examples identify some, but not all, types of projects that may result in a "Yes" answer to this question: 1) a project that generates steam; 2) a project that uses water as part of operating air pollution control equipment; 3) a project that requires water as part of the production process; 4) a project that requires a new, or the expansion of an existing, sewage treatment facility, new water lines, sewage lines, sewage hook-ups etc.; 5) a project where the water demand exceeds the capacity of the local water purveyor to supply sufficient water for the project; 6) a project that requires new or the expansion of existing, water supply and conveyance facilities; and, 7) a project that requires water to hydrotest pipelines, storage tanks etc. for structural integrity.
13.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project create an increase in the mass inflow of effluents to a public wastewater treatment facility that would require a new, or revision to an existing, National Pollutant Discharge Elimination System (NPDES) or other related permit at the facility?
14.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project result in the need for more than 350 new employees?
15.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project result in an increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round-trips per day?
16.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project result in an increase in customer traffic by more than 700 visits per day?
17.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project result in temporary or permanent noise or vibration in excess of what is allowed by the applicable local noise ordinance?
18.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project create a permanent need for new or additional solid waste disposal? Check "No" if the projected potential amount of solid waste to be generated by the project is less than five tons per day.
19.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project create a permanent need for new or additional hazardous waste disposal? Check "No" if the projected potential amount of hazardous wastes to be generated by the project is less than 42 cubic yards per day (or equivalent in pounds).
20.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project include equipment that after installation or modification will <u>change</u> the visual character of the site and its surroundings or block views?
21.	<input type="radio"/>	<input checked="" type="radio"/>	Will the project have equipment that will create a new source of external lighting that will be visible at the property line?

Section D – SIGNATURES

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT THIS FORM IS A SCREENING TOOL AND THAT THE SCAQMD RESERVES THE RIGHT TO CONSIDER OTHER PERTINENT INFORMATION IN DETERMINING CEQA APPLICABILITY.

1. Signature of Responsible Official of Firm:

Valerie Battest

2. Title of Responsible Official of Firm:

Manager

3. Print Name of Responsible Official of Firm: Valerie Battest

4. Date Signed: 9/9/2023

5. Phone # of Responsible Official of Firm:

714 928 1000

6. Fax # of Responsible Official of Firm:

7. Email of Responsible Official of Firm:

johnhaywood1000@yahoo.com

8. Signature of Preparer, (If prepared by person other than responsible official of firm):

9. Title of Preparer:

10. Print Name of Preparer:

11. Date Signed:

9/9/2023

12. Phone # of Preparer:

13. Fax # of Preparer:

14. Email of Preparer:

THIS CONCLUDES FORM 400-CEQA. INCLUDE THIS FORM AND ANY ATTACHMENTS WITH FORM 400-A.

ATTACHMENT 4



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

11/2/2023

CREEKSIDE MOBILE ESTATES
21650 TEMESCAL CANYON RD
CORONA, CA 92883

RE: Application Tracking Number(s) :647235

Facility ID: 189227

Thank you for filing your permit application with the South Coast Air Quality Management District. Your application is being returned for the reason indicated below. If you submitted a fee for this application, it will be refunded separately within 60 days. Please re-submit this application with the requested information and the processing fee of \$5,299.26 to the address listed below:

**AQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944**

If you have any questions or need additional information, please contact the engineer listed below.

Engineer: Duoduo Bao

Telephone: (909) 396 - 2112

Reasons for Returning Application(s) submitted on 9/15/2023

Other Reasons:

The application did not contain sufficient information to be deemed complete and is therefore being rejected pursuant to Rule 210. Please see the attached email sent on November 2, 2023.

Duoduo Bao

From: Duoduo Bao
Sent: Thursday, November 2, 2023 4:40 PM
To: johnhaywood1000@yahoo.com
Cc: Nicole Idiart
Subject: AN 647235 Facility ID 189227 CREEKSIDE MOBILE ESTATES -Application Rejection Letter

Dear John and Valerie,

We hope all is well with you. My name is Duoduo Bao and I am the assigned engineer processing your application (Application No. 647235), submitted for Creekside Mobile Estates (Facility ID 189227), for an air Permit to Operate for a wastewater treatment system. After reviewing the submittal, it has been determined that the application does not contain sufficient information to be deemed complete pursuant to South Coast Air Quality Management District (AQMD) Rule 210. Therefore this application is being rejected at this time. The facility may resubmit a complete application package which contains all information required of applicant seeking a permit from the South Coast AQMD, as identified in Regulation II.

As identified in Regulation II the application information including but not limited to:

1. Form 400-A with information of description of equipment. Please confirm the type of application (e.g., new equipment, modification of existing equipment, existing equipment not previously permitted, change of ownership).
2. Form 400-CEQA, Form 400-PS, Form 400-EG-I.
3. A description of the history and background of this facility.
4. A description of the wastewater treating system process, including Operating schedule (Numbers of hours/day, days/week, weeks/year), the capacity of the wastewater treating system (in gallons per day), etc.
5. The layout and process flow of the wastewater treating system.
6. Information associated with each piece of basic (existing, modified, and proposed) equipment used for the wastewater treating system.
 - a. Equipment identification number.
 - b. Materials entering and leaving the equipment.
 - c. Energy consumption (e.g., Btu/hr, KW/hr).
 - d. Operating parameters (e.g. powerhouse, temperature, pressure, flow rate).
 - e. Specification sheet from the equipment manufacturer.
7. The application fee based on the capacity of the waste water treating system that can be found on Rule 301. Please note when equipment is operated without the owner/operator first obtaining a required Permit to Construct or Permit to Operate, the permit processing fee shall be 150 percent (150%) of the amount. If the facility is a Small Business as defined in Rule 102 and the application fees assessed shall be fifty percent (50%) of the total amount. You can visit the SCAQMD Permit Processing Fees Portal to calculate the estimated application fees.

Please let me know if you have any questions. We are happy to arrange a meeting or a phone call to go over the application process with you.

Best regards,

Duoduo



Duoduo Bao (She/Her) | Air Quality Engineer

South Coast Air Quality Management District | www.aqmd.gov

21865 Copley Drive | Diamond Bar, CA 91765

Phone: 909.396.2112 | dbao@aqmd.gov

South Coast AQMD hours are from Tuesday to Friday, 7:00 am -5:30 am.

ATTACHMENT 5



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 75868

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
07	31	2019

Facility Name: CREEKSIDE MOBILE ESTATES		Facility ID: 189227	Sector: EO
Location Address: 21650 TEMESCAL CANYON RD		City: CORONA	Zip: 92883
Mailing Address: 21650 TEMESCAL CANYON RD		City: CORONA	Zip: 92883

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	203(a)			Failure to obtain South Coast AQMD Permit(s) to Operate (P/O) for waste water treatment equipment. A/N 647235 was rejected due to insufficient information provided to South Coast AQMD.
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: JOHN ADGER / VALERIE BATTEST	Phone: (951) 277-9095	Served By: JACQUELYNE DRAINVILLE	Date Notice Served: 12/06/2023
Title: OWNER / MANAGER	Email: creekside@jahdmgt.com johnhaywood1000@yahds.com	Phone No.: <input checked="" type="checkbox"/> 909-396-3539 <input type="checkbox"/> 310-233-	Email: jd@aqmd.gov
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CCR - California Code of Regulations		Method of Service: <input checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail	

ORIGINAL

ATTACHMENT 6



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 72950

DATE OF VIOLATION

Month: 07 Day: 31 Year: 2019

Facility Name Creekside mobile Estates		Facility ID# 189227	Service EO
Location Address 21650 Temescal Canyon Rd.	City Corona	Zip 92883	
Mailing Address 21650 Temescal Canyon Rd.	City Corona	Zip 92883	

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	203(a)			Failure to obtain South coast AQMD permits to operate (P/O) for waste water treatment equipment
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To John Adger/ Valerie Battest	Phone 951-277-9095	Served By Alisha Lewis	Date Notice Served 05-22-24
Title owner/ manager	Email creekside@jandhmgmt.com johnhays@jandhmgmt.com	Phone No <input checked="" type="checkbox"/> 909-396-2171 <input type="checkbox"/> 310-233-	Email alewis@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL

ATTACHMENT 7



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 73636

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
07	31	2019

Facility Name CREEKside mobile Estates		Facility ID# 189227	Sector ED
Location Address 21650 Temescal Canyon Rd.		City CORUNDA	Zip 92883
Mailing Address 21650 Temescal Canyon Rd.		City CORUNDA	Zip 92883

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	203(a)			Failure to ap obtain south coast AQMD permits to operate (P/O) for waste water treatment equipment.
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: John Adger/Valene Bullert	Phone: 951-277-9095	Served By: Alisha Lewis	Date Notice Served: 07-19-24
Title: owner/ manager	Email: creekside@jandhmgmt.com johnhayward1000@yahoo.com	Phone No: <input checked="" type="checkbox"/> 909-396-2171 <input type="checkbox"/> 310-233-	Email: alewis @aqmd.gov

*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations	Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail
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ORIGINAL

ATTACHMENT 8



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 73637

DATE OF VIOLATION		
Month	Day	Year
07	31	2019

Facility Name Creekside mobile Estates		Facility ID# 189227	Sector EO
Location Address 21650 Temescal canyon Rd.		City CORONA	Zip 92883
Mailing Address 21650 Temescal canyon Rd.		City CORONA	Zip 92883

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	203(a)			Failure to obtain South coast AQMD permits to operate (P/O) for waste water treatment equipment.
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: John Adger Valerie Baatist	Phone 951-277-9095	Served By: Alisha Lewis	Date Notice Served: 08-09-24
Title owner/manager.	Email creekside@jandhgmt.com johnmaywood1000@yahoo.com	Phone No. <input checked="" type="checkbox"/> 909-396-2171 <input type="checkbox"/> 310-233-	Email alewis @ aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL