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Site Plan Consultation for the
Ideal Electronics Lithium Battery Assembly Facility (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the CEQA document. Please send a copy of the CEQA document upon its completion and public release directly to South Coast AQMD as copies of the CEQA document submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

Based on the Site Plan materials, the Proposed Project would involve storage, technician testing, assembly, export logistics, and light manufacturing activities related to lithium-ion battery consumer products and electric vehicle (EV) components. The Proposed Project is located at 445 E. Menlo Avenue in the City of Hemet on Assessor Parcel Number (APN) 443-070-010, which consists of an approximately 0.50-acre Light Industrial parcel. Riverside County parcel mapping indicates that the Proposed Project site is located in close proximity to existing residential neighborhoods to the northeast and southeast, with additional residential uses located within approximately 1,000 feet to the west and northwest. Given the nature of lithium battery-related activities and the proximity of sensitive receptors, South Coast AQMD recommends that the Lead Agency ensure the CEQA document includes a detailed evaluation of potential air quality, health risk, and hazardous materials impacts.

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.

estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

Due to the Proposed Project's proximity to sensitive receptors in multiple directions and the potential for toxic air contaminant emissions associated with lithium battery materials and likely combustion-related sources (e.g., emergency generators, delivery trucks), South Coast AQMD recommends that the Lead Agency evaluate whether a project-level Health Risk Assessment, including mobile source contributions where applicable, is warranted to disclose potential cancer and noncancer health risks. In addition, if the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment[5].

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the CEQA document. Given the Proposed Project's lithium battery assembly and testing activities, the Lead Agency should quantify emissions from all operational sources, including any stationary combustion equipment, battery testing processes, material handling, solvent usage, and associated truck and worker vehicle trips. The assumptions in the air quality analysis in the CEQA document will be the basis for evaluating any required permit under CEQA and imposing permit

[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,[6] South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,[7] and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.[8]

Potential mitigation measures to reduce potential air quality and health risk impacts from the Proposed Project may include, but are not limited to, minimizing diesel truck activity near sensitive receptors, encouraging the use of zero-emission or near-zero emission delivery vehicles where feasible, restricting truck idling and queuing, and locating loading areas and hazardous materials storage as far from nearby residences as practicable. Given the Proposed Project's lithium battery assembly and export logistics components, operational emissions may be driven by both onsite processes and associated delivery vehicle activity; therefore, mitigation measures should address for both stationary and mobile source contributions.

Operational mitigation measures for mobile sources that the Lead Agency should consider, particularly if the Proposed Project generates substantial delivery activity or attracts heavy-duty diesel-fueled truck trips, to include:

- Encouraging the use of zero-emission (ZE) or near-zero emission (NZE) delivery and haul trucks, where feasible, consistent with CARB's Advanced Clean Trucks requirements[9] and other applicable clean truck regulations.
- Restricting truck idling and prohibiting truck queuing on public roadways near nearby sensitive receptors.
- Limiting the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Providing electric vehicle (EV) charging stations or make-ready electrical capacity for future ZE delivery fleets, where appropriate.

[6] South Coast AQMD's CEQA Air Quality Handbook, Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

[7] South Coast AQMD's 2022 Air Quality Management Plan can be found at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan (Chapter 4 - Control Strategy and Implementation).

[8] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

[9] CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.

Hazardous Materials and Fire Risk Associated with Lithium Battery Operations

Lithium-ion battery assembly, testing, and storage facilities may involve hazardous materials, including flammable electrolytes, solvents, and battery modules that pose fire and explosion risks under thermal runaway conditions. Fires involving lithium batteries may also generate toxic air contaminants and particulate emissions that could affect nearby sensitive receptors. Therefore, South Coast AQMD recommends that the Lead Agency include a Hazardous Materials and Safety Evaluation in the CEQA document that addresses hazardous materials handling, storage quantities, emergency response procedures, fire suppression systems, and potential off-site consequence impacts to surrounding residential communities. Disclosing the maximum quantity of lithium-ion batteries and hazardous materials stored onsite at any time is necessary to evaluate potential air quality and public safety impacts.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Jivar Afshar at jafshar@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:JA
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