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Initial Study and Mitigated Negative Declaration (IS/MND) for the Quick Crete Products Facility Project (PPT250012) (Proposed Project) (SCH No.: 2026041256)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context and assist the Lead Agency, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the IS/MND

Based on the IS/MND, the Proposed Project consists of establishing a concrete batch plant and manufacturing facility for concrete products, such as benches, containers, and tables, on a 19.01 acre site. The Proposed Project includes an 88,400-square-foot building with 83,700 square feet dedicated for manufacturing and warehouse purposes, 1,900 square feet for offices, and 2,800 square feet for employee support, 106 parking spaces, a water retention basin, an outdoor storage area (40,000 square feet), and a mold storage area (55,700 square feet).[1] Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., existing residential dwelling) is located approximately 40 feet west of the project site.[2] Construction of the Proposed Project is expected to begin in August 2025 and conclude in November 2026, lasting approximately 15 months.[3] The Proposed Project is located on the south side of 54th Avenue, east of Harrison Street, and west of Shady Lane in the unincorporated community of Thermal in Riverside County.[4]

South Coast AQMD Comments

Introduction

As explained in more detail in the following individual comments, the IS/MND appears to have several substantive deficiencies in the air quality and health risk analyses that relied on incorrect and/or unsupported assumptions which led to incorrect and/or unsupported conclusions that the Proposed Project would result in no significant or less than significant air quality and greenhouse

[1] IS/MND, p. 10.
[2] *Ibid,* p. 32.
[3] *Ibid,* p. 56.
[4] *Ibid,* p. 10.

gas impacts. Based on the review of the emissions calculations, the Proposed Project will result in potentially significant operational impacts which would require, at a minimum, feasible mitigation measures to eliminate or reduce the impacts to less than significant levels. If the air quality impacts cannot be mitigated to less than significant levels, an Environmental Impact Report (EIR), in lieu of the IS/MND, should be prepared instead.

South Coast AQMD Air Permits, Role as a Responsible Agency and Request for Formal CEQA Consultation

Implementation of the Proposed Project involves construction and operation of a new concrete batch plant and other processes which would require South Coast AQMD air permits for multiple, new stationary and portable sources, including but not limited to emergency generators, material handling systems, forklifts, concrete batching equipment, internal combustion engines, boilers, etc. but the IS/MND does not appear to have an analysis of these sources. As such, the CEQA document should be revised to include an analysis of any and all new stationary and portable equipment associated with the proposed manufacturing and concrete-related operations that would require South Coast AQMD air permits, including but not limited to concrete batching equipment, material handling systems, emergency generators, and any internal combustion engines or combustion sources supporting facility operations and trucking activities. The analysis should evaluate the air quality and greenhouse gas emissions associated with these sources.

In addition to identifying all stationary and portable equipment requiring South Coast AQMD permits in the CEQA document, a discussion about the rules that potentially apply to the Proposed Project should be included. For example, the potentially applicable South Coast AQMD rules may include Rule 201 – Permit to Construct,[5] Rule 203 – Permit to Operate,[6] Rule 401 – Visible Emissions,[7] Rule 402 – Nuisance,[8] Rule 403 – Fugitive Dust,[9] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[10] Rule 1113 – Architectural Coating,[11] Regulation XIII – New Source Review,[12] Rule 1401 – New Source Review of Toxic Air Contaminants,[13] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[14] Rule 1155 – Emissions of Particulate Matter from Concrete Batch Plants,[15] Rule 1157 – PM_{10} Emission Reductions from Aggregate and Related Operations,[16] and etc. For questions regarding what types of equipment would require air permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. More general information on permits is also available from South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Lastly, it is essential that the CEQA document includes an analysis of all construction and operational emissions associated with all sources, including those sources subject to South Coast

[5] South Coast AQMD. Rule 201 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[6] South Coast AQMD. Rule 203 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[7] South Coast AQMD. Rule 401 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[8] South Coast AQMD. Rule 402 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[9] South Coast AQMD. Rule 403 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[10] South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[11] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[12] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[13] South Coast AQMD. Rule 1401 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[14] South Coast AQMD. Rule 1470 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf
[15] South Coast AQMD. Rule 1155 available at: Rule 1155. Particulate Matter (PM) Control Devices
[16] South Coast AQMD. Rule 1157 available at: Rule 1157. Pm10 Emission Reductions From Aggregate And Related Operations

AQMD air permit requirements because this information will be relied upon in establishing permit conditions, emission limits, and compliance requirements for the applicable air permits. As Responsible Agency under CEQA, the South Coast AQMD will be required to independently evaluate the adequacy of the CEQA document before relying on it to issue discretionary approvals.

Thus, as set forth in CEQA Guidelines Sections 15096, South Coast AQMD should be identified in the CEQA document as a Responsible Agency for the Proposed Project. Given the certainty that discretionary air permits will be required, early consultation is necessary to ensure that the CEQA document is sufficient for South Coast AQMD's use as a Responsible Agency and to avoid future procedural or legal barriers to permit issuance. Accordingly, this comment letter shall serve as a formal request for CEQA consultation between the Lead Agency and South Coast AQMD regarding the scope, assumptions, and adequacy of the air quality and health risk analyses.

Improper Use of CEQA Baseline in the Air Quality Analysis

The IS/MND evaluates operational emissions using a "net new emissions" approach[17] which improperly subtracted emissions from an existing facility located approximately 100 miles away. Pursuant to CEQA Guidelines Section 15125(a), the environmental setting at the project site constitutes the baseline against which project impacts must be evaluated. Emissions from an off-site, geographically distinct facility do not represent existing environmental conditions at the Proposed Project site and therefore, do not constitute a legally supportable CEQA baseline. The use of this new net emissions approach in the IS/MND had the effect of artificially minimizing the actual operational emissions and understating/distorting the true environmental impacts from the Proposed Project.

Importantly, if the correct CEQA baseline is applied (e.g., by not subtracting the emissions from the other existing facility), the Proposed Project's operational air quality impacts of the new facility may be significant, particularly given the nature of concrete batch plant operations and the proximity of sensitive receptors. After applying the corrected baseline, mitigation measures for the operational phase would likely be required, and preparation of an EIR may be necessary to adequately evaluate and disclose the potentially significant adverse air quality impacts and identify feasible mitigation measures.

Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis to evaluate the proposed new facility as a standalone project using an appropriate CEQA baseline that does not take credit or reduce emissions based on a different facility located elsewhere. The revised baseline analysis should reflect existing ambient environmental conditions at the Proposed Project site and should not rely on emissions associated with the separate, off-site facility. The revised analysis should quantify all operational emission sources associated with the Proposed Project, including stationary equipment, mobile sources, truck activity, material handling operations, and concrete batching processes. Emissions associated with industrial operations should be quantified using appropriate and technically supported methodologies, including applicable emission factors from the United States Environmental Protection Agency (U.S. EPA) AP-42 Compilation of Air Pollutant Emission Factors, Section 11.12,[18] when project-specific

[17] Table 5: Summary of Peak Operational Emission, IS/MND
[18] Emission Factor Documentation for AP-42 Section 11.12 Concrete Batching: Emission Factor Documentation for AP-42 Section 11.12: Concrete Batching - Final edits March 2010

source testing data are not available. The revised analysis should ensure that project emissions are fully characterized and appropriately evaluated under CEQA, including consistency with applicable with the Federal and State Ambient Air Quality Standards (AAQS) and South Coast AQMD regional and localized significance thresholds.

Insufficient Dispersion Modeling and Receptor Coverage

The current analysis in the IS/MND appears to rely on South Coast AQMD's Localized Significance Threshold (LST) screening methodology, which is intended for conducting project-level assessments with defined site layouts, emission sources, and operational characteristics **for sites less than five acres**. Based on Table 3.2 of the South Coast AQMD LST Guidelines,[19] the Proposed Project does not qualify for use of the LST screening methodology because the Proposed Project includes large combustion sources to operate at the site, at 19.01 acres, which far exceeds five acres.

According to the IS/MND, the modeling analysis relied on AERMOD to evaluate onsite NOx, CO, PM10, and PM2.5 emissions during project operation. However, the modeling analysis in the IS/MND only included 48 receptors which is insufficient for identifying the maximum ground-level concentrations (GLCs)[20]. As such, the modeling analysis appears to have underestimated the localized air quality impacts from the Proposed Project.

Under South Coast AQMD's Air Quality Modeling Guidance[21], when AERMOD is used to assess criteria pollutant impacts:

- A uniform Cartesian receptor grid with spacing of 100 meters or less must be used for all distances within 1 kilometer of the source.
- Discrete receptors must be placed along the ambient air boundary (e.g., property or fenceline boundary) following maximum spacing requirements.
- Receptor placement must be sufficient to capture maximum concentration gradients and potential impacts to surrounding sensitive receptors.

In addition, the modeled GLCs must be combined with appropriate background concentrations and compare to the applicable Ambient Air Quality Standards (AAQS) to determine whether the project would exceed the AAQS.

Therefore, to ensure the analysis complies with South Coast AQMD modeling guidance and CEQA requirements, the CEQA document should be revised to:

- Follow the South Coast AQMD's Modeling Guidance for receptor placement and grid spacing.
- Expand and justify the receptor network to ensure the maximum GLCs are captured.

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[19] *Final Localized Significance Threshold Methodology

[20] Typically, a 20-acre site would include at least 400 receptors in an AAQS analysis to adequately capture the maximum ground-level concentration.

[21] South Coast AQMD Modeling Guidance for AERMOD: https://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor

- Incorporate background concentrations and compare total concentrations to the applicable AAQS.
- Present full dispersion results for all receptor locations.

Health Risk Assessment (HRA) during Project Operation

CEQA Guidelines Sections 15126.2 and 15126.4 require a description of the significant environmental effects, significant environmental effects that cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a "substantial, or potentially substantial, adverse change in the environment."

In addition to the air quality impacts from the criteria pollutants and greenhouse gases, the adverse health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources, including, but not limited to, expected future permitted stationary and portable sources, mobile sources, and other emission sources, during the operational phase must be appropriately evaluated using qualitative and/or quantitative approaches to determine whether potentially substantial adverse impacts may occur.

However, the IS/MND for the Proposed Project does not include a comprehensive assessment of the health risks associated with stationary, portable and mobile sources during the operational phase. As a result, the potential cancer risks associated with the Proposed Project remain unknown and undisclosed. This omission is particularly concerning because the operation of the Quick Crete Products Facility Project is expected to involve multiple diesel-powered stationary and portable sources and vehicles that emit diesel particulate matter (DPM), known as TAC and carcinogen. In addition, substantial fugitive dust is expected to be generated due to the nature of concrete batch plant operations which utilize aggregate handling and transfer operations, cement silos, material loading and unloading activities, conveyor systems, onsite vehicle circulation, and equipment such as diesel and/or propane-powered forklifts. Collectively, these emission sources can result in continuous and intermittent emissions of particulate matter (including PM10 and PM2.5) as well as TACs. For this reason, the CEQA document should be revised to include a detailed, source-specific evaluation rather than solely relying on aggregated operational emissions.

As mentioned earlier in this letter, the aerial maps indicate that the nearest off-site sensitive receptor, a residential area, is located adjacent to or within 40 feet west of the Proposed Project site. As such, the Lead Agency is recommended to conduct an operational phase HRA, which should include evaluating truck emissions (including the truck routes to and from the site, truck loading/unloading docks, and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the reasonably foreseeable operating conditions.

An operational HRA is necessary to determine the potential cancer, chronic, and acute health risk impacts associated with the Proposed Project on off-site sensitive receptors and workers. South Coast AQMD has developed and adopted Air Quality Significance Thresholds for TACs[22] to assist lead agencies in determining whether a project would result in potentially significant cancer, chronic, or acute health risk impacts under CEQA. The Proposed Project's health risk impacts and

[22] South Coast AQMD Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf

the conclusions regarding significance findings should be disclosed in the revised CEQA document.

Lack of Operational Truck Trip and Hauling Assumptions

According to the IS/MND, the Trip Generation Assessment for the proposed QCP Fabrication Facility estimates approximately 210 daily trips, including 15 AM peak-hour trips and nine PM peak-hour trips.[23] However, the analysis does not identify how many of these trips would consist of heavy-duty diesel truck trips associated with the operational phase of the manufacturing and warehouse facility, as opposed to standard passenger vehicle trips. Given the nature of concrete product manufacturing and warehousing operation, material deliveries and product shipments would reasonably be expected to involve heavy-duty diesel trucks. Without this information included in the CEQA document, the operational diesel emissions and potential localized exposure impacts to nearby sensitive receptors have not been adequately characterized.

In addition, both the IS/MND and the CalEEMod input files indicate zero hauling trips during construction. While this assumption may be acceptable depending on how construction materials are staged and delivered off-site, the IS/MND does not explain how construction material delivery, debris export, or transport of heavy-duty equipment would occur without any hauling activities being accounted for in the construction emissions modeling analysis.

Therefore, South Coast AQMD staff recommends that the Lead Agency distinguish and quantify operational diesel truck trips separately from total vehicle trips and reassess construction hauling assumptions. The revised analysis should evaluate whether a project-specific Health Risk Assessment (HRA), or HRA screening analysis, is warranted given the proximity of nearby residential uses to the project site.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final IS/MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the IS/MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record explaining why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment

[23] IS/MND, p. 26.

letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

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