



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Rialto Bioenergy Facility (RBF) 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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a bioenergy facility that will produce 13.38 megawatts of renewable energy from food waste, liquid waste, and municipal biosolids (Proposed Project). The Proposed Project would divert approximately 1,080 tons per day of waste from existing landfills. Based on a review of aerial photographs, the Proposed Project is bounded by industrial uses to the north, east, south, and west.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that regional operational NOx emissions are significant and unavoidable. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 1.45 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk¹. SCAQMD staff has concerns about the air quality and HRA analyses in the Draft EIR. The analysis utilized assumptions which have likely led to an under-estimation of the Proposed Project's health risks. Please see the attachment for more information.

Pursuant to the California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

¹ Draft EIR, Section 4.7.3 – Health Risk Assessment.

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 Ms. Lijin Sun, Program Supervisor, CEQA IGR Section, at (909) 396-3308 if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:JC
SBC171122-05
Control Number

ATTACHMENT

Air Quality Analysis

1. The Lead Agency found that the Proposed Project's regional operational emissions would exceed SCAQMD's regional air quality CEQA significance threshold for NO_x². However, the Lead Agency assumed that all of the Proposed Project's inbound collection trucks were not new trips because they would have traveled to another solid waste landfill even if the Proposed Project were not implemented³. The Lead Agency's finding was based on a displaced truck trip methodology that incorrectly assumed that the Proposed Project would reduce emissions by changing the distances that the collection trucks would travel. The Proposed Project would not eliminate collection truck trips that would otherwise haul materials to another waste facility. Further, there is no analysis that collection truck trips would be eliminated to support such an assumption. By excluding the emissions from collection truck trips caused directly by and attributed to the Proposed Project, the Draft EIR has likely underestimated the Proposed Project's operational emissions from collection trucks. Therefore, SCAQMD staff recommends that the Lead Agency include the emissions from collection truck trips in the Final EIR to ensure the Proposed Project's operational impacts on air quality are adequately analyzed and disclosed.
2. Section 3.5.1 – The reference to liquid waste should be clarified that the liquid waste is limited to expired food sauce packets or other similar waste food productions.
3. Section 3.5.1 – The process statement should clearly state if the biosolids which are received by the Proposed Project is already dewatered or if there is a dewatering system at the Proposed Project.
4. Section 3.5.1 – The process statement should clearly state that proposed facility includes its own waste water treatment system which processes the liquid food wastes, and the wet fraction from the biosolids. Additionally, the process statement should state that the waste water treatment system uses an anaerobic digestion process the liquid “food” wastes and “wet fraction.
5. Section 3.5.1 – The project description should state that all gases from the pyrolysis of the dried biosolids are burned in the dryers and treated by an air pollution control system.
6. Section 3.5.2 should be amended to address the clarifications recommended to Section 3.5.1 as discussed in Comment Nos. 2 through 5.
7. Table 4.2.A is missing the federal 1-hr NO₂ standard of 0.1 ppm.
8. Table 4.5.A, Aeration Basins /Waste Water, the Lead Agency should provide additional justification for the N/A designation for criterial pollutants (VOC, in particular).

² Draft EIR. Section 4.8 – Significant Impacts.

³ Draft EIR. Section 4.5.2 – Existing Baseline Emissions Methodology.

Health Risk Assessment (HRA)

9. The Lead Agency did not include emissions from the Aeration Basin/Waste Water operations. SCAQMD staff recommends including emissions from the operation of the Aeration Basin/Waste Water operations to accurately reflect a complete emission profile that is reasonably foreseeable for operation of the Proposed Project in the Air Quality Analysis and HRA.
10. The Lead Agency modeled exhaust emissions consistent with the methodology established by the San Joaquin Valley Air Pollution Control District⁴. In the SCAQMD staff's comment letter⁵ on the Proposed Project's Notice of Preparation/Initial Study (dated September 27, 2017), it was recommended that the Lead Agency use the SCAQMD's mobile source HRA Guidance when conducting a HRA for the Proposed Project. Since the Proposed Project is located within SCAQMD's jurisdiction, SCAQMD staff reiterates this recommendation that the Lead Agency review and use the SCAQMD's HRA Guidance for performing a mobile source HRA analysis for the Proposed Project⁶.
11. Truck travel was modeled as line sources. SCAQMD staff recommends that the Lead Agency revise the HRA using a line of volume sources that spans the entire truck travel area to ensure that impacts from are adequately analyzed.
12. Truck idling was modeled as a point source. SCAQMD staff recommends that the Lead Agency revise the HRA using a series of volume sources that spans the idling area to ensure that impacts are properly analyzed.
13. On-site idling is reasonably foreseeable. On-site idling emissions should include 15 minutes of idling to ensure that emissions from idling are properly analyzed and potential health impacts from idling are disclosed. The 15-minute idling is a more realistic representation of the idling activities and serves as a conservative estimate of impacts from idling. The 15-minute idling includes the emissions generated when entering the Proposed Project site while heading towards the dock area; idling at the dock; and the emissions generated when leaving the docks while departing from the Proposed Project.

Permits

14. Since permits from SCAQMD would be required for the Proposed Project, this makes SCAQMD Responsible Agency for the Proposed Project, and the Final EIR should identify SCAQMD as a Responsible Agency. Further, the Proposed Project will be required to submit complete and timely permit applications for the following equipment/systems:
 - a. Biosolids Dryer (2)

⁴ RBF HRA Model Inputs 101617 CEQA Final.

⁵ South Coast Air Quality Management District. September 27, 2017. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/nop-rialtobioenergy-092717.pdf>.

⁶ Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

- b. Pyrolysis System Burner
- c. RTO, Combustion
- d. Emergency Generator
- e. Flares (4)
- f. CHP Engine (4)
- g. Emergency Fire Pump
- h. Biogas Upgrader
- i. Receiving Units (3)
- j. Miscellaneous Foul Air Emissions Equipment (7)
- k. Biosolids Pellet/Char Loading (2)
- l. Cooling Towers
- m. Aeration Basins/Waste Water (4)

Should there be any questions on permits, please contact SCAQMD's Engineering and Permitting staff at (909) 396-2737. For more general information on permits, please visit the SCAQMD's webpage, at: <http://www.aqmd.gov/home/permits>.

Compliance with SCAQMD Rules and Regulations

15. The Final EIR should discuss how the Lead Agency will comply with other applicable SCAQMD rules and regulations, including, but are not limited to, the following:
- a. Rule 201: Permit to Construction
 - b. Rule 203: Permit to Operate
 - c. Rule 405: Solid Particulate Matter - Weight
 - d. Rule 407: Liquid and Gaseous Air Contaminants
 - e. Rule 409: Combustion Contaminants
 - f. Rule 431.1: Sulfur Content of Gaseous Fuels
 - g. Rule 1146: Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters
 - h. Rule 1147: NO_x Reductions from Miscellaneous Sources
 - i. Rule 1193 – Clean On-Road Residential and Commercial Refuse Collection Vehicles