8.1 A

SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

FROM: Riverside County Waste Management Department

SUBMITTAL DATE: January 28, 2010

SUBJECT: Edom Hill Transfer Station (EHTS) Solid Waste Facility Permit (SWFP) Revision Project

RECOMMENDED MOTION:

1. **Adoption** of Mitigated Negative Declaration for Environmental Assessment (EA) No. EHTS 2009-02, based upon the findings in the Initial Study and the consistency finding herein, and the conclusion that although the project could have a significant effect on the environment, there will not be a significant effect on the environment, because the mitigation measures described in the EA have been incorporated into the project.
2. **Adoption** of the Mitigation Monitoring Program (MMP) for E.A. No. EHTS 2009-02 with the requirement that the facility operator submit to the Riverside County Waste Management Department (RCWMD) an annual report detailing compliance with the MMP, no later than 45 days after the beginning of the calendar year.
3. **Approval** of the SWFP Revision Project for the EHTS.

BACKGROUND: In August 2002, the Board of Supervisors (BOS) approved the development and operation of the EHTS. The EHTS is located on approximately 21.9 acres, primarily situated within the property limits of the closed Edom Hill Landfill, which is located at 70-100A Edom Hill Road, immediately east of Cathedral City limits in an unincorporated area of eastern Riverside County. Burrtec Recovery & Transfer, LLC (Burrtec) owns and operates the EHTS through a lease agreement with the RCWMD. (continued)

Hans W. Kernkamp, General Manager-Chief Engineer

FINANCIAL DATA				
	Current F.Y. Total Cost:	$ 0	In Current Year Budget:	N/A
	Current F.Y. Net County Cost:	$ 0	Budget Adjustment:	N/A
	Annual Net County Cost:	$ 0	For Fiscal Year:	

SOURCE OF FUNDS:

Positions To Be Deleted Per A-30 ☐

Requires 4/5 Vote ☐

C.E.O. RECOMMENDATION:

APPROVE

BY: Alex Gann

County Executive Office Signature Alex Gann

FORM APPROVED COUNTY COUNSEL
BY: TARISA R-MCKENNA DATE

Departmental Concurrence

Dep't Recomm.:	Per Exec. Ofc.:
☒ Policy	☒ Policy
☐ Consent	☐ Consent

Prev. Agn. Ref.: 10.1 (8/13/02); 12.2 (11/5/02); 12.1 (8/24/04)

District: 4

Agenda Number: 12.1

A SWFP (33-AA-0296) was issued in 2003 which allowed the EHTS facility to receive and process up to 2,600 tons per day of municipal solid waste (MSW). The SWFP was amended in 2004 to allow for the use of end-dump trailer trucks, in 2007, when Burrtec took over operation of the facility from Waste Management of the Desert, and again in 2008, to permit manual floor sorting of recyclables.

In 2007, a LEA Notification Permit was issued for the chipping and grinding of up to 200 tons per day of green and untreated wood wastes. Currently, green and woody waste is received and processed on-site to produce biomass fuel, wood mulch, landfill alternative daily cover material, and soil amendments.

PROJECT DESCRIPTION: The proposed project will revise the SWFP to introduce the following administrative and operational changes:

- Increase permitted maximum daily tonnage from 2,600 tons per day to 3,500 tons per day.
- Increase the permitted area of the SWFP from 8.4 acres to 21.9 acres, to include the entire lease area.
- Permit for the production of compost by means of windrow composting of greenwaste at a capacity of up to 200 tpd.
- Permit the chipping and grinding of 300 tpd of green and woody waste for the production of mulch, biofuel, soil amendments, and greenwaste ADC.
- Permit the storage of construction/demolition wastes in the C&D Storage Area at a capacity of up to 300 tpd.
- Change the hours of operation for the acceptance of incoming material to 6:00 a.m. to 6:00 p.m. Monday through Saturday.

ENVIRONMENTAL ANALYSIS: EA No. EHTS 2009-02 was prepared by the RCWMD to evaluate the potential environmental impacts resulting from the proposed project and to identify appropriate mitigation measures to reduce or eliminate these impacts. The EA was prepared in conformance with the California Environmental Quality Act (CEQA) and *CEQA Guidelines* (California Code of Regulations Section 15000 et. seq.).

While the EA has identified that the proposed project has the potential to impact or be impacted by water quality, air quality, seismicity, public health and safety, noise, public services, cultural/paleontological resources, and climate change from greenhouse gas emissions, each of these potential impacts can be fully mitigated to below a level of significance with implementation of the mitigation measures identified in the EA. As an extra measure, the RCWMD drafted two additional mitigation measures addressing air quality:

AQ-11 Within 48 hours of completion of a composting cycle (21, 45, or 90 days), the finished material shall be moved offsite, unless the EHTS is closed for a holiday, at which time the material will be removed on the next business day.

AQ-12 Within 45 days of project approval from the Riverside County Board of Supervisors, the transfer station operator shall comply with Rule 1133 and 1133.1 of the South Coast Air Quality Management District (SCAQMD) for the chipping and grinding of green and woody waste for the production of mulch, biofuel, soil amendments, compost, and greenwaste alternative daily landfill cover (ADC), include all registration, monitoring, and reporting requirements.

A MMP, containing the mitigation measures identified in the EA, as well as the two additional measures, is included herein for Board adoption. As a result, the RCWMD has prepared a Mitigated Negative Declaration for adoption by the Board, pursuant to Section 15070 of the CEQA Guidelines.

After consulting with the Riverside County Flood Control and Water Conservation District (Flood Control), it was determined that the EA incorrectly identified Flood Control as a responsible agency for the review and approval the Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP.) The EA and MMP reflect the change (deletion of Flood Control) and continue to identify the Regional Water Quality Control Board (RWQCB) as the responsible agency for review and approval of any updates to the SWPPP and WQMP, in compliance with the General Industrial Permit, as issued by the RWQCB.

In accordance with CEQA, the Notice of Intent to Adopt a Mitigated Negative Declaration and EA were posted with the State Clearinghouse and the County Clerk and were transmitted to responsible agencies and interested parties (see attached Transmittal List) for a 30-day comment period that began on November 23, 2009, and ended on December 22, 2009. Public notices advertising the public comment period for the Notice of Intent and EA were also published in two regional newspapers (see attached): *The Press-Enterprise* and *The Desert Sun*. The EA could also be viewed on the RCWMD's website at www.rivcom.org. Lastly, copies of the EA were made available to the public at the RCWMD, the Riverside County Clerk, the City of Riverside Main Library, the Cathedral City Public Library, the Desert Hot Springs Public Library, and the Palm Desert Public Library.

During the comment period, the RCWMD received a total of three (3) letters (see attached): 1) South Coast Air Quality Management District; 2) Department of Toxic Substances Control; and, 3) Riverside County Fire Department (no comment).

The RCWMD has reviewed the comments on the proposed Mitigated Negative Declaration to determine if the comments would result in a substantial revision of the Mitigated Negative Declaration, as defined in State *CEQA Guidelines* Section 15073.5. While *CEQA Guidelines* do not require the Lead Agency to prepare written responses of comment on the Negative Declaration, the RCWMD has prepared responses to all comments about the project (see attached Responses to Comments). In staff's consideration, the comments do not warrant any revision of the Mitigated Negative Declaration. Staff is recommending that the Board of Supervisors adopt the Mitigated Negative Declaration on the basis that potential project impacts, as identified in the EA, can be avoided or fully mitigated as previously noted.

Consistency Finding with Riverside County General Plan, Zoning, Countywide Integrated Waste Management Plan (CIWMP) and Other Applicable Environmental Plans or Policies

According to the Riverside County General Plan, the project site is designated as "PF" (Public Facilities) on the Western Coachella Valley Area Plan – Land Use Map. The operation of the EHTS, which is a waste transfer, recycling, and composting facility, and which offers essential solid waste services to all cities and unincorporated communities in the western Coachella Valley, is consistent with this land use designation and the County General Plan. Lastly, any proposed use of adjoining lands located in Cathedral City by the RCWMD to carry out the project, including the Organics/C&D Processing/Storage Area, will not conflict with any applicable land use plan, policy, or ordinance of the City.

The proposed SWFP revision project is deemed a "public project" under the provisions of Section 18.2.a.b(1) of Riverside County Ordinance 348, which states in part that "no federal, state, county or city governmental project shall be subject to provisions of this ordinance." The proposed project is, therefore, not subject to County zoning requirements. It can be noted, however, that the landfill site is zoned W-2-20 (Controlled Development - 20 acre minimum lot size), which identifies "Disposal Service Operations" as being conditionally permitted within this zone. Furthermore, while the Organics/C&D Processing/Storage Area is located within the City of Cathedral City (City) limits, the RCWMD and the City entered into the EHTS City Mitigation Agreement, dated November 5, 2002, and amended April 21, 2009, that states future expansion/enhancements of the EHTS within City limits is subject to COUNTY standards and plan review. Therefore, the proposed project would not conflict with General Plan and zoning.

The EHTS is consistent with the goals and policies of the Countywide Integrated Waste Management Plan (CIWMP) by providing both waste transfer and recycling services under the current SWFP. The proposed recycling of greenwaste through composting is consistent with the California Integrated Waste Management Board's Strategic Directive SD-6.1, which sets the goal of reducing the amount of organics in the disposal waste stream by 50% by 2020.

The project is already incorporated into the Riverside County Non-Disposal Facility Element (NDFE), which identifies and describes existing, proposed, and/or any proposed expansion of existing non-disposal facilities that will be utilized to implement the CIWMP's Source Reduction and Recycling Element. The proposal will further the EHTS's recycling goals via composting. Upon Project approval, a NDFE amendment shall be processed to incorporate the proposed changes to EHTS SWFP operating hours, maximum tonnage, and composting.

Lastly, while the closed Edom Hill Landfill site is surrounded by the Edom Hill Conservation Area, the site, including the entire EHTS facility, is not located within a conservation area, as identified in the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). The EHTS is an existing facility, not directly adjacent to, or within a conservation area. No new buildings or structures are proposed with the Project, and the proposed project will not result in disturbance of undisturbed lands. Therefore, the proposed project would not conflict with the goals and policies of the CVMSHCP.

Mitigation Monitoring Program for
Edom Hill Transfer Station Facility
Solid Waste Facility Permit (SWFP) Revision

(Environmental Assessment No. EHTS 2009-02)

Mitigation Monitoring Program

For
Edom Hill Transfer Station Facility
Solid Waste Facility Permit (SWFP) Revision

(Environmental Assessment No. EHTS 2009-02)

Riverside County Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

Prepared January 2010

Timing: Indicates the time frame in which the mitigation measure should be performed or completed.

Reporting: The owner/operator of the EHTS shall report to the Riverside County Waste Management Department (RCWMD), acting on behalf of the Lead Agency, on the implementation status of **all** mitigation measures, which should include, but not limited to, the following topics, where applicable:

- Time schedules for the mitigation measures implemented or completed
- Results of the mitigation measures implemented or completed
- Effectiveness of the mitigation measures
- Technical problems or special circumstances encountered during implementation and the solution(s) implemented to resolve the problems
- Public complaints about environmental nuisances that are supposed to be mitigated
- Citations by monitoring agencies for violations of mitigation requirements or environmental standards

An annual report shall be prepared and submitted by Burrtec to the RCWMD no later than 45 days after the beginning of the calendar year

Monitoring: Designates the agency responsible for overseeing and/or monitoring the implementation of the mitigation measure(s) included in the MMP. In the case of this project, monitoring responsibilities are shared with various local, state, and federal agencies, including the RCWMD, as the land owner and lessor of the lease agreement for the establishment and operation of the EHTS. These agencies have oversight capability to ensure compliance by Burrtec.

The following abbreviations and acronyms are used in this MMP:

B&S:	Riverside County Building and Safety Department
BMP:	Best Management Practices
BPS:	Best Performance Standards
CAL/OSHA:	California Occupational Safety and Health Administration
CDRRR:	California Department of Resources Recycling and Recovery
LEA:	Local Enforcement Agency of the Environmental Health Department
NPDES:	National Pollutant Discharge Elimination System
RCFD:	Riverside County Fire Department
RCHRSD	Riverside County Human Resources, Safety Division
RCWMD:	Riverside County Waste Management Department
RWQCB:	Colorado River Basin Regional Water Quality Control Board
SCAQMD:	South Coast Air Quality Management District
SWPPP:	Stormwater Pollution Prevention Plan
SWRCB:	State Water Resources Control Board
WQMP:	Water Quality Management Plan

WATER

Mitigation Measures:

W-1 Drainage and stormwater control facilities shall be constructed and maintained in full compliance with drainage/stormwater control plans and conditions, as approved by the Regional Water Quality Control Board.

W-2 Prior to any modification to facility activities including future compost activities, the Storm Water Pollution Prevention Plan and/or Water Quality Management Plan for the EHTS shall be reviewed by the Regional Water Quality Control Board, as appropriate, and revised to ensure that modified operations continue to comply with the structural and nonstructural Best Management Practices that satisfy the State Water Resources Control Board and that comply with the requirements of the National Pollutant Discharge Elimination System to protect receiving waters from degradation.

W-3 All municipal solid waste will be processed indoors or contained in bins to prevent exposure to surface water flows or rain water.

W-4 Any washing activities are required to be conducted in areas that are designed to catch and drain all water from those areas. Existing containment and treatment systems will continue to be maintained throughout the facility and upgraded, if warranted, to address increased operations.

W-5 Exterior surfaces will be cleaned using a street sweeper or other mechanical means, as required, to reduce on-site accumulation of oil and fluids.

W-6 All truck and equipment maintenance will be conducted over impermeable surfaces, with curb if deemed necessary.

W-7 Future compost activities shall comply with all requirements of the Regional Water Quality Control Board, including the submittal of a Report of Waste Discharge, if required.

W-8 The hazardous waste storage area will be maintained in a manner that contains any spills within a confined area.

W-9 The operator shall update and implement the facility's Storm Water Pollution Prevention Plan and Water Quality Management Plan, as necessary, to reflect expanded operations.

Agency/Individual Responsible for Implementation: Burrtec Waste Industries, Inc.

Timing: Ongoing process during the active operating life of the EHTS and the greenwaste compost and soil amendment productions.

AIR QUALITY

Mitigation Measures:

AQ-1 Where greenwaste is composted in static piles and where soil amendment production requires static piles formation for greater than 14 days, the material static piles shall be constructed with a layer of finished compost covering the entire surface area of the piles.

AQ-2 At a minimum, eleven transfer trucks that meet the US EPA 2007 heavy-duty truck emission standards shall be included in the facility's vehicle fleet prior to daily refuse received at the facility reaching 3,500 tons per day. These transfer trucks shall be phased into the facility's fleet according to the following schedule:

Operators of EHTS shall acquire and operate seven (7) transfer trucks that meet US EPA 2007 heavy-duty truck emission standards once daily tonnage consistently[1] exceeds 3,000 tpd, not to exceed 3,100 tpd. For each additional 100 tpd consistently received, operators of EHTS shall acquire and operate one (1) additional truck that meets US EPA 2007 heavy-duty truck emission standards.

Tonnage	Trucks Required	Fleet Total
3,000	7	7
3,100	1	8
3,200	1	9
3,300	1	10
3,400	1	11
Total	**11**	**11**

AQ-3 The operator of the transfer station shall comply with Rule 403 and Rule 403.1 of the South Coast Air Quality Management District for fugitive dust.

AQ-4 The operator of the transfer station shall provide protective devices, such as dust masks, as needed, to employees handling waste.

AQ-5 Residual MSW will be transferred on a daily basis. Waste that has not been transferred at the end of the day will be loaded into a transfer trailer(s), covered, and parked outside the transfer building. Additional capacity is available on the tipping floor. Residual waste will not remain at the facility unless the receiving disposal site is closed for a holiday at which time the waste will be transferred on the next business day.

AQ-6 The transfer station and project site will be cleaned daily to remove loose material and litter. The site and tipping areas will be swept regularly. Boxes, bins, and containers will be cleaned on a regular basis.

1 'Consistently' is defined as daily tonnage averaged over a consecutive three (3) week period.

PUBLIC HEALTH AND SAFETY

Mitigation Measures:

PH-1 The facility operator shall maintain the following permits: 1) a small quantity hazardous waste generator permit (EPA Identification Number) from the Department of Toxic Substances Control, California Environmental Protection Agency; and, 2) Permit by Rule from the Department of Toxic Substances Control, California Environmental Protection Agency.

PH-2 The facility operator shall maintain its load check program to screen or salvage hazardous waste from the waste stream before it is transferred and disposed, which shall, at a minimum, include: a) visual load inspections at the scale house and on the tipping floor of the transfer station; b) hazardous waste handling, accumulation, labeling, storage and disposal, and licensing; c) employee training and certification; d) emergency response scenarios; and, e) the development of contingency plans (i.e., spill contingency plan and fire prevention plan), in compliance with local ordinances and state and federal regulations.

PH-3 Hazardous waste collected at the transfer station will be consolidated, stored in structurally sound, leak-proof containers, with proper containment and ventilation, and disposed in accordance with time frames and procedures established by the Permit by Rule from the Department of Toxic Substances Control. The hazardous waste storage box will be locked during non-operational hours.

PH-4 Fire suppression equipment (i.e., fire extinguishers, etc.) and other emergency safety and spill equipment, shall be maintained as required by the Riverside County Fire Department, the Riverside County Department of Environmental Health, or other regulatory agencies.

PH-5 The facility operator shall comply with and update the EHTS Business Emergency Plan, which includes: a) basic health and safety training, addressing site hazards, proper work techniques, and emergency and evacuation procedures; 2) the use and provision for personal protective equipment (i.e., earplugs, hard hats, dust masks, etc.); 3) heavy equipment hazards and site traffic hazards, 4) prevention, preparedness, and response measure for fire, spills, and other accidents; and 5) first aid and cardiopulmonary resuscitation.

PH-6 The project site and structures will be cleaned (i.e., pickup of loose litter, etc.) on a regular schedule to maintain a neat and clean appearance and to prevent track-out of waste materials.

PH-7 The operator will be required to pickup any illegally or indiscriminately dumped material attributable to the operation of the Edom Hill Transfer Station along the primary delivery routes of Date Palm Drive/Palm Drive to Varner Road to Edom Hill Road at least twice weekly.

NOISE

Mitigation Measures:

N-1 All equipment used in the operation of the EHTS Facility, fixed or mobile, shall be equipped with properly operating and maintained mufflers to the satisfaction of the Riverside County – Human Resources Safety Division, and California Occupational Safety and Health Administration.

N-2 Equipment operators and other facility personnel subject to excessive noise levels will be provided with hearing protection (i.e., ear plugs, etc.).

Agency/Individual Responsible for Implementation: Burrtec Waste Industries, Inc.

Timing: Ongoing process during the active operating life of the EHTS and the greenwaste compost and soil amendment productions.

Reporting: Annual report on implementation of N-1 thru N-2 to the RCWMD.

Monitoring: RCWMD, RCHRSD, CAL/OSHA, and LEA.

CULTURAL/PALEONTOLOGICAL RESOURCES

Mitigation Measures:

PALEO-1 Minor grading or paving activities incidental with the proposed SWFP revision shall be monitored by the contractor and EHTS staff. If any sign or information were to indicate that the site may in fact contain paleontological resources, a paleontologist may be hired immediately to monitor site grading activities, with the authority to halt grading to collect uncovered paleontological resources, curate any resources collected with an appropriate repository, and file a report with the Planning Department documenting any paleontological resources that are found during the course of site grading.

PALEO-2 In the event that suspected cultural resources are encountered during the course of incidental grading or paving activities, all work in the immediate vicinity of the find shall cease and a qualified archaeologist shall be consulted before work is resumed, as well as, the Bureau of Indian Affairs Area archaeologist and the State Historic Preservation Officer (SHPO), if required.

PALEO-3 In the event that human remains are encountered during the course of grading or paving activities, all work in the immediate vicinity of the find shall cease until the County Coroner can inspect the remains and make a determination as to the nature of death and age of remains. If the remains are determined by the Coroner to be of prehistoric Native American or other historic association, and not of legal jurisdiction of the Coroner's Office, the Native American Heritage Commission (NAHC) and the designated local tribal representative(s), and any other appropriate representative(s) shall be contacted for consultation on the culturally appropriate treatment/mitigation for the remains. The agreed upon treatment shall be implemented within a reasonable time period, allowing for any negotiated analysis to occur.

Agency/Individual Responsible for Implementation: Burrtec Waste Industries, Inc.

Timing: Ongoing process during the active operating life of the EHTS and the greenwaste compost and soil amendment productions.

Reporting: Annual report on implementation of PALEO-1 thru PALEO 3 to the RCWMD.

Monitoring: RCWMD, LEA.

Edom Hill Transfer Station – SWFP Revision Project
Transmittal List

EDOM HILL TRANSFER STATION– SWFP REVISION PROJECT
TRANSMITTAL LIST
November 2009

Federal Agencies

U.S. Fish and Wildlife Service
Ecological Services – Carlsbad Field Office
6010 Hidden Valley Road
Carlsbad, CA 92009

State Agencies

State Clearinghouse **(FedEx 15 copies)**
Office of Planning & Research (OPR)
1400 Tenth Street, Room 121
Sacramento, CA 95814

California Air Resources Board **(via SCH)**
1001 "I" Street
P. O. Box No. 2815
Sacramento, CA 95812

California Integrated Waste Management Board **(FedEx 1 copy)**
Environmental Review Section
P. O. Box 4025
Sacramento, CA 95812-4025

California Department of Fish and Game
Environmental Services Division **(via SCH)**
330 Golden Shore, Suite 50
Long Beach, CA 90802

Regional Water Quality Control Board **(via SCH)**
Colorado River Basin Region No. 7
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

California Department of Water Resources **(via SCH)**
1416 9th Street, MS 24-01
Sacramento, CA 95814

South Coast Air Quality Management District **(send directly)**
Office of Planning and Rules
21865 East Copley Drive
Diamond Bar, CA 91765

Department of Transportation **(via SCH)**
CALTRANS District #8 - Planning
464 W. Fourth Street
San Bernardino, CA 92402

Department of Toxic Substances Control **(via SCH)**
8800 Cal Center Drive
Sacramento, CA 95826-3200

California State Water Resources Control Board **(via SCH)**
901 "P" Street
P. O. Box #100
Sacramento, CA 95802-0100

California Native American Commission **(via SCH)**
915 Capital Mall, Room 364
Sacramento, CA 95814

City of Palm Springs
3200 E. Tahquitz-Canyon Way
P.O. Box 2783
Palm Springs, Ca 92263

City of La Quinta
Community Development
P. O. Box 1504
La Quinta, CA 92253

City of Indian Wells
Planning Department
44-950 El Dorado Drive
Indian Wells, CA 92210

City of San Jacinto
Planning Department
248 East Main Street
San Jacinto, CA 92583

Indian Tribes

Agua Caliente Tribal Council
5401 Dinah Shore Dr.
Palm Springs, CA 92264

Libraries

City of Riverside
Central Public Library
Mission Inn Boulevard
Riverside, CA 92501

Desert Hot Springs Public Library
11691 West Drive
Desert Hot Springs, CA 92240-3697

Palm Desert Public Library
73-300 Fred Waring Drive
Palm Desert, CA 92260-2870

Cathedral City Public Library
33-520 Date Palm Drive
Cathedral City, CA 92234-4725

Fire Department - Stations

Cathedral City Fire Station
27610 Landau Blvd.
Cathedral City, CA 92234

North Palm Springs Fire Station
PO Box 580002.
North Palm Springs, CA 92258-0002

Thousand Palms Fire Station
72695 La Canada Way
Thousand Palms, CA 92276

School Districts

Palm Springs Unified School District
980 E Tahquitz Canyon Way
Palm Springs, CA 92262

Local Task Force (Notice Only)

Lee Anderson
59-777 Calhoun Street
Thermal, CA 92274

Ed Campos
CR&R
1706 Goetz Road
Perris, CA 92570

Robert Magee
32400 Beechwood Lane
Lake Elsinore, CA 92530

Russell Keenan
Kleinfelder, Inc.
1220 Research Drive, Ste. B
Redlands, CA 92374

Paul Ryan
P.F. Ryan & Associates
P.O. Box 344
Norco, CA 92860

Malcolm Miller
City of Norco
2870 Clark Avenue
Norco, CA 92860

Siobhan Foster
City of Riverside
Public Works Department
3900 Main Street
Riverside, CA 92522

John Skerbelis
Environmental Health Dept.
(Mail Stop #2611)

Ben Wilcox
Southern California Recycling
29-250 Rio Del Sol Road
Thousand Palms, CA 92276

Katie Barrows
53298 Montezuma
La Quinta, CA 92253

Simon Housman
69730 Highway 111, Suite 207
Rancho Mirage, CA 92270

Chuck Tobin
Burrtec
9890 Cherry Avenue
Fontana, CA 92334

Bruce Scott
18051 Gilman Springs Road
P.O. Box 369
San Jacinto, CA 92581

Robert Moran
Economic Development Agency
(Mail Stop #1330)

Terry Wold
8516 Conway Drive
Riverside, CA 92504

Ella Zanowic
Mayor Pro Tem
City of Calimesa
908 Park Avenue
Calimesa, CA 92320

Bruce Williams
City of Rancho Mirage
69825 Highway 111
Rancho Mirage, CA 92270

Frankie Riddle
City of Palm Desert
73-510 Fred Waring Drive
Palm Desert, CA 92260

Surrounding Property Owners
(Notice Only)

Friends of the Desert Mountains
c/o James A. Grassman
45480 Portola
Palm Desert, CA 92260
APN: 659-130-009; 659-130-010; 659-180-012

Sandra Dawson
705 Central Avenue
St. Michaels, MN 55376
APN: 659-130-011, 659-130-008

M. Astleford
705 Central Avenue
St. Michaels, MN 55376
659-130-013

Loren O'Connor
31878 Del Obispo Street No. 118
San Juan Capistrano, CA 92675
APN: 659-180-013

Adams Steel of Inland Empire
200 E. Frontera Road
Anaheim, CA 92806
APN: 659-180-014

Desert Solutions, Inc.
69115 Ramon Road, No. 508
Cathedral City, CA 92234
APN: 659-180-015; 659-180-016; 659-180-017

City of Cathedral City
68700 Avenida Lalo Guerrero
Cathedral City, CA 92234
APN: 659-190-012; 659-180-020; 659-180-025;
659-190-011; 659-180-001; 659-190-008

State of California
c/o Coachella Valley Mountains
Conservancy
73710 Fred Warring Drive Suite. #205
Palm Desert, CA 92260
APN: 659-180-022

County of Riverside County
C/O Real Estate Division
3133 Mission Inn Blvd.
Riverside, CA 92507
APN: 659-180-024; 659-180-027; 659-190-014;
659-190-016

Coachella Valley Mountains Conservancy
73710 Fred Waring Drive, Ste. #205
Palm Desert, CA 92260
APN: 659-200-001

USA 659
U.S. Department of the Interior
Washington, D.C. 21401
APN: 659-200-002; 659-210-002; 659-260-027;
659-150-006

Ben F. Gosser
2137 W. 183rd Street
Torrance, CA 90504
APN: 659-260-003; 659-260-004

Agustin Latosquin
2710 Cypress Road
Palm Springs, CA 92262
APN: 659-260-005

Ernest R. Lindberg
264 Roycroft Avenue
Long Beach, CA 90803
APN: 659-260-006

Albert J. Bodgin
307 Chanticleer
Cherry Hill, NJ 08003
APN: 659-260-007

Violeta Punzalan
6930 De Celis Pl, No. 40
Van Nuys, CA 91406
APN: 659-260-008

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

December 24, 2009

Ryan Ross
Riverside County Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

Subject: Edom Hill Transfer Station Solid Waste Facility Permit (SWFP) Revision Project
SCH#: 2009111082

Dear Ryan Ross:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 22, 2009, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2009111082
Project Title Edom Hill Transfer Station Solid Waste Facility Permit (SWFP) Revision Project
Lead Agency Riverside County

Type **MND** Mitigated Negative Declaration

Description The Project is a proposal to revise the Edom Hill Transfer Station SWFP to: 1) Increase permitted maximum daily tonnage to 3,500 tons per day; 2) Increase the area of thw SWFP to 21.9 acres to include the entire lease area; 3) Permit for the production of compost by means of windrow compostion of greenwaste at a capacity up to 200 tpd; 4) Permit the chipping and grinding of green and woody waste for the production of mulch, biofuel, soil amendments, and greenwaste ADC at a capacity up to 300 tpd; 5) Permit the storage of construction/demolition wastes at a capacity of up to 300 tpd; and 6) Increase the hours of operation for the acceptance of incoming material to 6:00 a.m. to 6:00 p.m. Monday through Saturday.

Lead Agency Contact

Name Ryan Ross
Agency Riverside County Waste Management Department
Phone 951-486-3200 **Fax**
email
Address 14310 Frederick Street
City Moreno Valley **State** CA **Zip** 92553

Project Location

County Riverside
City Cathedral City
Region
Lat / Long 33° 52' 47.3" N / 116° 26' 3.77" W
Cross Streets Edom Hill Rd & Varner Rd
Parcel No. 659-200-002, -180-027
Township 3S **Range** 5E **Section** 26 **Base** SBB&M

Proximity to:

Highways I-10
Airports
Railways
Waterways
Schools
Land Use Public Facility (PF), Industrial (I)/W-2-20 (Controlled Development, 20 acre minimum), EH-LI (Edom Hill Light Industrial)/PF,I

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 6; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Integrated Waste Management Board; Regional Water Quality Control Board, Region 7; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 11/23/2009 **Start of Review** 11/23/2009 **End of Review** 12/22/2009

Note: Blanks in data fields result from insufficient information provided by lead agency.

Public Notices Advertising the Public Comment Period
For the Notice of Intent and
Environmental Assessment No. EHTS 2009-02

THE PRESS-ENTERPRISE

3450 Fourteenth Street
Riverside CA 92501-3878
951-684-1200
951-368-9018 FAX

PROOF OF PUBLICATION
(2010, 2015.5 C.C.P.)

Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc.: Environmental Ass. No. EHTS 2009-02

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper of general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673 and under date of August 25, 1995, Case Number 267864; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

11-23-09

I Certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: Nov. 23, 2009
At: Riverside, California

WASTE MANAGEMENT

14310 FREDERICK ST
COUNTY OF RIVERSIDE
MORENO VALLEY CA 92553

Ad #: 10075150

PO #:

Agency #: _____

Ad Copy:

Notice of Intent to Adopt a Mitigated Negative Declaration For the Edom Hill Transfer Station Solid Waste Facility Permit Revision Project Environmental Assessment No. EHTS 2009-02

The Riverside County Waste Management Department, on behalf of Riverside County as Lead Agency, has determined that the proposed Solid Waste Facility Permit Revision for the Edom Hill Transfer Station, located at 70-100 Edom Hill Road, Cathedral City, CA, will not have a significant effect on the environment with the implementation of mitigation measures and recommends that a Mitigated Negative Declaration (MND) for Environmental Assessment (EA) No. EHTS 2009-02 be adopted.

The Project is a proposal to revise the Edom Hill Transfer Station SWFP to: 1) Increase permitted maximum daily tonnage to 3,500 tons per day; 2) Increase the area of the SWFP to 21.9 acres to include the entire lease area; 3) Permit for the production of compost by means of windrow composting of greenwaste at a capacity up to 200 tpd; 4) Permit the chipping and grinding of green and woody waste for the production of mulch, biofuel, soil amendments, and greenwaste ADC at a capacity up to 300 tpd; 5) Permit the storage of construction/demolition wastes at a capacity of up to 300 tpd; and 6) Increase the hours of operation for the acceptance of incoming material to 6:00 a.m. to 6:00 p.m. Monday through Saturday.

The MND and EA No. EHTS 2009-02 are available for public review at the following locations: Riverside County Waste Management Department website at www.rivcowm.org or at 14310 Frederick Street in Moreno Valley and Riverside County Clerk at 2724 Gateway Drive in Riverside from 7:30 AM to 4:30 PM, Monday through Friday. The documents have also been sent to the following libraries, but these libraries should be called directly for hours and availability of documents: Cathedral City Public Library, 33-520 Date Palm Drive in Cathedral City (760.328.4262); Desert Hot Springs Public Library, 11691 West Drive in Desert Hot Springs (760.329.5926); Palm Desert Public Library, 73-300 Fred Waring Drive in Palm Desert (760.346.6552); and City of Riverside Main Library, 3581 Mission Inn Ave. in Riverside (951.826.5201).

Any comments on the proposed project, the determination to adopt a MND, or requests for more information should be directed to:

Riverside County Waste Management Department
14310 Frederick Street Moreno Valley, California 92553
Attention: Ryan Ross, Planner IV
Telephone: (951) 486-3200 Fax: (951) 486-3205
Email: rmross@co.riverside.ca.us

Written comments must be received at the above address by noon on December 22, 2009. Any written comments received will be forwarded to the Riverside County Board of Supervisors and will be considered, along with the EA and any oral testimony, before any action is taken on the project. The Board of Supervisors may consider this project on or after January 12, 2010. Any decision made by this body will be mailed to anyone requesting such notification. 11/23

Comments Letters received on
Draft Mitigated Negative Declaration for the Proposed
Edom Hill Transfer Station Solid Waste Facility
Permit Revision Project
Environmental Assessment No. EHTS 2009-02

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: DECEMBER 22, 2009 December 22, 2009

Mr. Ryan Ross, Planner IV
Riverside County Waste Management Department
14310 Fredrick Street
Moreno Valley, CA 92553

rmross@co.riverside.ca.us

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Edom Hill Transfer Station Solid Waste Facility Permit Revision Project Environmental Assessment No. EHTS 2009-02

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration (Final MND).

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SN:EE:CT:JK:JHL:GM

RVC091125-04
Control Number

from the composting operations be controlled by a covered and aerated collection system that is vented to a device, such as a biofilter. Additional mitigation measures can be found at the CIWMB website: (http://www.ciwmb.ca.gov/Organics/Processors/Systems/default.htm).

Linda S Adams
Secretary for
Environmental Protection

Department of Toxic Substances Control

Maziar Movassaghi, Acting Director
5796 Corporate Avenue
Cypress, California 90630

Arnold Schwarzenegger
Governor

December 17, 2009

Mr. Ryan Ross
Riverside County Waste Management Department
14310 Fredrick Street
Moreno Valley, California 92553
rmross@co.riverside.ca.us

DRAFT MITIGATED NEGATIVE DECLARATION (ND) FOR EDOM HILL TRANSFER STATION SOLID WASTE FACILITY PERMIT (SWFP) REVISION (SCH# 2009111082)

Dear Mr. Ross:

The Department of Toxic Substances Control (DTSC) has received your submitted document for the above-mentioned project. As stated in your document: "The Project is a proposal to revise the Edom Hill Transfer Station to: 1) Increase permitted maximum daily tonnage to 3,500 tons per day; 2) Increase the area of the SWFP to 21.9 acres to include the entire lease area; 3) Permit for the production of compost by means of window composing of greenwaste at a capacity up to 200 tpd; 4) Permit the chipping and grinding of green and woody waste for the production of mulch, biofuel, soil amendments, and greenwaste ADC at a capacity up to 300 tpd; 5) Permit the storage of construction/demolition wastes at a capacity of up to 300 tpd; and 6) Increase the hours of operation for the acceptance of incoming material to 6:00 a.m. to 6:00 p.m. Monday through Saturday".

Based on the review of the submitted document DTSC has the following comments:

1) The ND should identify and determine whether current or historic uses at the project area may have resulted in any release of hazardous wastes/substances.

2) The document states that the ND would identify any known or potentially contaminated sites within the proposed project area. For all identified sites, the ND should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

4) The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions (LDRs) may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination.

5) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site overseen by the appropriate government agency might have to be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

6) If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the ND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

7) If weed abatement occurred, onsite soils may contain herbicide residue. If so, proper investigation and remedial actions, if necessary, should be conducted at the site prior to construction of the project.

8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

9) DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see

RIVERSIDE COUNTY
FIRE DEPARTMENT
In cooperation with the
California Department of Forestry and Fire Protection

210 West San Jacinto Avenue • Perris, California 92570 • (951) 940-6900 • Fax (951) 940-6910

John R. Hawkins
Fire Chief

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Board of Supervisors

Bob Buster,
District 1

John Tavaglione,
District 2

Jeff Stone,
District 3

Roy Wilson,
District 4

December 16, 2009

Riverside County Waste Management Dept.
Mr. Ryan Ross, Planner IV
14310 Frederick St.
Moreno Valley, CA 92553

Re: Notice of Intent to Adopt a Mitigated Negative Declaration for the Edom Hill Transfer Station Solid Waste Facility Permit Revision Project, Environmental Assessment No. EHTS 2009-2

Dear Mr. Ross,

Thank you for providing the Riverside County Fire Department the opportunity to review the Edom Hill Transfer Station project located in the unincorporated area of Thousand Palms.

With respect to the referenced project, the Riverside County Fire Department has no further comments. All of the impacts have been adequately addressed.

The California Fire Code outlines fire protection standards for the safety, health, and welfare of the public. These standards will be enforced by the Fire Chief.

If I can be of further assistance, please feel free to contact me at (951) 940-6349 or e-mail at jason.neumann@fire.ca.gov.

Sincerely,

Jason Neuman

Fire Captain

Strategic Planning Bureau

Response to Comments/Questions received on Draft Mitigated Negative Declaration for the Proposed Edom Hill Transfer Station Solid Waste Facility Permit Revision Project Environmental Assessment No. EHTS 2009-02

RESPONSES TO COMMENTS/QUESTIONS FROM DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC)

Comment #1

The ND should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances.

Response

While the EHTS is located within the closed Edom Hill Landfill property, the 21.9-acre lease area does not include any portion of the landfill disposal footprint. The Edom Hill Landfill was a Class III Solid Waste Landfill, owned and operated by the County of Riverside. Landfill closure construction was completed in February 2008, in accordance with the requirements of Title 27. No hazardous materials were identified during closure and monitoring activities.

While the EHTS does not accept hazardous wastes, small amounts of hazardous materials and household hazardous waste (HHW) are occasionally present in recyclable materials and the municipal solid waste stream. The operator implements a load checking program to prevent these materials from being transported for disposal in the receiving landfill. The facility's Hazardous Waste Screening and Exclusion Program details onsite procedures in the event that hazardous or infectious waste is discovered in the recyclables or solid waste tipping areas. Hazardous material is separated from incoming materials on the tipping floors by facility personnel. All facility personnel are provided with training for the identification and handling of hazardous materials. Any hazardous materials found in the waste loads are placed in the hazardous waste temporary storage area. This area is secured and provided with secondary containment. At least once every 90 days, hazardous materials are removed by a licensed hazardous waste contractor and transported to a permitted disposal or recycling facility. To date, there has been no reported release of hazardous wastes/substances.

Comment #2

The document states that the ND would identify any known or potentially contaminated sites within the proposed project area. For all identified sites, the ND should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the pertinent regulatory agencies…

Response

The EHTS does not contain any known contaminated sites. See response to Comment 1 for description of the hazardous waste temporary storage area. The EA thoroughly examined potential impacts as a result of the Project and determined that with the mitigation measures stated in the EA, the Project will not have a significant effect on human health or the environment.

Comment #3

The ND should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out

Response

See response to Comment 5. The EA thoroughly examined potential impacts as a result of the Project and determined that with the mitigation measures stated in the EA, the Project will not have a significant effect on groundwater.

Comment #7

If weed abatement occurred, onsite soils may contain herbicide residue. If so, proper investigation and remedial actions, if necessary, should be conducted at the site prior to construction of the project.

Response

Comment acknowledged.

Comment #8

If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

Response

Comment acknowledged. To account for hazardous materials found within the incoming waste stream, the EHTS has been issued: 1) Hazardous Waste Generator Permit; 2) Hazardous Waste Handler Permit; and 3) EPA Generator Number.

Comment #9

DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see: www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

Response

Comment acknowledged.

re-calculated emission factor of 1.54 pounds/ton of greenwaste for the full lifecycle emissions calculation. This action by the SJVAPCD has nullified the technical and scientific validity of the re-calculated emission factor (1.54 pounds/ton of greenwaste) from the investigative study for use in calculating lifecycle emissions of VOC.

As pointed out in the CIWMB response letter, both the NorCal facility site and Site X testing results and calculated emission factors were likely skewed high due to: i) high average wind speed; ii) likely inclusion of food waste in the feedstock; iii) inclusion of anaerobic materials; and iv) low sample counts. In addition, the Site X results were possibly skewed high, as a result of using small windrows, which are thought to have a smaller "biofilter effect," compared to larger windrows, on fugitive VOC emissions. Above all, in both the NorCal and Site X studies, tipping piles made up around half of the emissions, thereby tainting the calculated emission factors due to the presence of excessive anaerobic emissions. Based on these considerations, the emissions factors derived from the NorCal site and Site X testing results were rejected.

The Modesto Study results were used in the VOC emissions calculations for the project because they are scientific, legitimate, and valid, in light of the following characteristics of the study:

- **i)** A full-scale field investigation to determine life-cycle emissions instead of a "snap shot in time" type of emissions investigation that characterizes the other field test studies considered. As explained in the Modesto Study report, *life-cycle characterization of the emission profile is important in order to estimate the total impact to the environment of the VOC emissions.*
- **ii)** A total of 109 samples were collected in the study, of which 9 were media blanks for quality control, 36 from the greenwaste windrow. These sampling counts were the highest compared to the other field test studies considered. For example, the 36 emissions samples from the greenwaste windrow were already more than the emissions samples collected and used in the NorCal and Site X studies combined. Therefore, the empirical emissions evaluated are statistically more reliable for the calculations of life-cycle emission factors for the composting process than their counterparts in the other studies.
- **iii)** Considerations were given to the timing of sampling, so that emissions characteristics closely before and after a feedstock turning event were accounted for and yet overall emissions sampling data was not skewed.
- **iv)** Considerations were given to spatial location of sample points in order to characterize the variable emission fluxes of the "chimney-breathing" pattern caused by the temperature profile within the composting windrows. In other words, samples were collected at both venting and non-venting locations of the windrow's ridge-top. In order to determine the appropriate sampling locations, an initial screening of the ridge-top was conducted with a portable gas analyzer (TVA-1000) prior to each sampling event to determine venting and non-venting locations. This deliberate procedure ensured a high degree of integrity and uniformity of the sample data that was needed for its purpose.
- **v)** The study consisted of an empirical evaluation of the efficacy of two best management practices (BMP) alternatives to reduce VOC emissions, and thus it provided specific mitigation efficiency data that can be used to determine a project's VOC emissions impact significance after mitigation.
- **vi)** The study's testing protocol was developed in consultation with the SJVAPCD and in anticipation of its future efforts to regulate VOC emissions from greenwaste composting.

Response

We believe it is unnecessary, as the proposed mitigation measure of using a pseudo-biofilter is shown to be sufficient to reduce VOC emissions to below the significance threshold. However, it is the intent of the greenwaste operator that such a full-scale greenwaste composting system will be employed when the greenwaste composting operation is expanded in the future. At that time, a new environmental assessment will be performed.

LINDA S. ADAMS
SECRETARY FOR ENVIRONMENTAL PROTECTION

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

ARNOLD SCHWARZENEGGER
GOVERNOR

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812-4025
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August 1, 2008

Koshoua C.X. Thao
San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD)
1990 E. Gettysburg Avenue
Fresno, California 93726

Dear Koshoua:

Thank you for the opportunity to comment on Chuck Schmidt's "Air Emissions Data Review." We appreciate your holding the public workshop to collect verbal testimony from stakeholders and the public on this subject.

In general, we appreciate the district's efforts to examine this subject. The report highlights the fact that the greenwaste management industry is diverse, and that emissions rates estimated at those facilities which have been tested range widely. We continue to have concerns about how a default emissions factor would be applied industry wide. Estimates of the potential inventory and throughput of compost have decreased by roughly 6 million tons but the overall VOC emission reductions for composting in the 2007 Ozone plan have not changed, even though the Plan is based on a much higher original inventory estimate, We are concerned what this means in terms of expected emissions reductions from organic materials recyclers as a whole.

Our specific concerns about Chuck's report are detailed below.

Page 1, bottom paragraph: "The data are averaged for reference only with no implication that the average is representative of green waste compost emissions for the SJVUAPCD jurisdiction." Comment: If the average is not "representative of green waste compost emissions", then it should not be displayed. CIWMB staff calculated a weighted average of the three studies based on the number of samples in each study. The weighted average comes out to 4.05 lbs/ton if we use the recalculated Modesto results, or 3.59 lbs/ton with the original Modesto emissions factors. These potential factors are a better starting point for negotiations, particularly because we believe both the Norcal and "site X" data pools are skewed high, for reasons we will explain in this document.

Page 2, just below table: "The data are even more diverse than this table may indicate." Comment: This statement needs greater explanation. A reasonable interpretation of this comment and the one above is that there is too little data, and it is too wide ranging, to draw reasonable conclusions or formulate an emissions factor applicable to the wide range of compost facilities and facility conditions found in the San Joaquin Valley.

Page 2, continued: "The Norcal profile particularly shows a unique characteristic initial cycle VOC spike." Comment: A spike that is both unique and characteristic of other profiles seems to be a contradiction. The spike may actually be an outlier since it is based on one flux sample taken on Day 3. A total of 4 flux samples taken on days 6 and

INTEGRATED WASTE MANAGEMENT BOARD

More importantly, if one increases the density of the material without substantially changing the surface area or changing the flux measurements, then one would expect the emissions factor to go down, not up, because the same emissions would be attributed to a greater tonnage of material. Please explain how an increase in density could lead to an increase in the emissions factor when flux and surface area remain equal (we agree that the 6-square-foot increase in the surface area is not significant).

Regarding the recalculation of the ridge, middle and bottom sector: as with the density, the original calculations of the surface areas of the pile sectors were based on measurement in the field, not calculation. That is why they differ from Figure 2, which was presented in the Modesto Study as an approximation, and was never intended to be taken literally. Compost piles vary in size and shape. They rarely appear perfectly formed as in Figures 1 or 2.

Bottom of page: This page ends abruptly and without a period. It is not clear if the narrative is completed or whether verbiage has been accidentally deleted.

Appendix C: Cover letter.

Top of page: "These results are not final yet, but we are not expecting any dramatic changes. However, do not make important decisions regarding these results until they are finalized." Have these results been finalized?

Bottom of page; What is Site Z and why is that data blacked out?

Table 3: What is the basis for the daily throughput number? If this number is correct, then the annual throughput of this facility is some 200,000 tons per year less than anticipated. This would represent another significant reduction in the district's inventory. Please investigate whether this figure is correct. Also, this table indicates the feedstock pile average age is 45 days. Because this operator typically runs a small bulldozer to squeeze air out of the feedstock pile (thereby reducing the risk of spontaneous combustion) this pile is almost certainly anaerobic. If anaerobic materials are used to create windrows, initial emissions may be expected to be higher.

Page 7: last bullet item. The meaning of this paragraph is unclear.

To summarize, we believe the Site X emissions factor is skewed high for the following reasons:

- High average wind speed
- Low sample count
- Likely inclusion of food waste in feedstocks
- Use of anaerobic materials from 45-day-old stockpile
- Possible impact of small windrows with smaller "biofilter effect."

Furthermore, we believe the NorCal data is skewed high for many of the same reasons, with the noted exception of the last.

Again, thank you for the opportunity to comment, and for all your hard work to understand the role of responsible greenwaste management in a more sustainable future for all Valley residents.

Sincerely,

Robert Horowitz
Senior Integrated Waste Management Specialist
916-341-6523

LINDA S. ADAMS
SECRETARY FOR ENVIRONMENTAL PROTECTION

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

ARNOLD SCHWARZENEGGER
GOVERNOR

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(916) 341-6016

Dec. 15, 2009

Sungkey Ma, Planner IV
Riverside County Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

Dear Mr. Ma:

Thank you for the opportunity to clarify the CIWMB's position on the Modesto Emissions Study. I am the technical senior staff responsible for the area of compost emissions, and I and my management stand by the work, the methodology, the quality controls, and the outcomes of this study. The Modesto study is still the most complete study of its kind, with by far the largest amount of samples.

That being said, we recognize that compost pile emissions are highly variable, and that other scientifically valid studies have results with much higher putative emissions factors. However, it is because compost piles are so variable that the sheer number of samples is important. The Jepson Prairie study, for instance, has only 12 distinct samples. The results in that study are heavily driven by the Day 3 emissions, which appear to be an outlier. We do not know enough about the confidential data in the second study, Site X, to make an informed judgment, but the report written for the SJVUAPCD states there were 20 distinct samples. In contrast, the Modesto study had 100 samples, of which 36 were on the plain greenwaste windrow.

The Modesto study only looks at windrows, and no other aspects of an organic materials handling operation. The early SCAQMD studies, as well as both the Jepson Prairie and Site X studies, attempt to discern an emission factor based on the unique aspects of the facility in question. In all of those studies, tipping pile and grind pile emissions factored heavily into total facility emissions. The Modesto study also did not quantify curing-stage emissions beyond 60 days; however, emissions at that stage of the compost process are known to be orders of magnitude lower than the active phase.

If your proposed facility is expected to have extensive tipping piles or mountains of freshly ground materials, then an adjustment to the Modesto factors would be in order. To the extent that you can move materials rapidly into a windrow, and move them off the property once composting is done, the Modesto emissions factors are a reasonable standard for your use. If not, then a higher emission factor may be appropriate to model the characteristics of your facility.

We hope that this helps clarify our position.

Sincerely,

Robert Horowitz
Senior Integrated Waste Management Specialist
Statewide Technical and Analytical Resources Division
California Integrated Waste Management Board

Notice of Determination

COUNTY OF RIVERSIDE
WASTE MANAGEMENT DEPARTMENT

NOTICE OF DETERMINATION

TO:

_X_ Office of Planning and Research (OPR)
1400 Tenth Street
Room 121
Sacramento, CA 95814

_X_ County Clerk
County of Riverside

FROM:
Riverside County
Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

For County Clerk's Use Only:

SUBJECT: Filing of Notice of Determination in Compliance with Section 15075 of the California Environmental Quality Act, *CEQA Guidelines* (California Code of Regulations, Title 14, Chapter 3)

Project Title: Edom Hill Transfer Station Solid Waste Facility Permit Revision Project; Mitigated Negative Declaration and Environmental Assessment (EA) No. EHTS 2009-02

State Clearinghouse No.: 2009111082 **Contact Person:** Ryan Ross, Planner IV **Area Code/No. Ext.:** 951/486-3200

Project Applicant/Property Owner & Address: Riverside County Waste Management Department
14310 Frederick Street, Moreno Valley, CA 92553

Project Location: The Edom Hill Transfer Station is located in the mid Riverside County region at 70-100 Edom Hill Road, Cathedral City, CA, east of the City of Cathedral City and north of Interstate-10 (Section 26, T3S, R5E of SBBM/Portion of Riverside County APNs 659-200-002, 659-180-027).

Project Description: The Project is a proposal to revise the Edom Hill Transfer Station SWFP to: 1) Increase permitted maximum daily tonnage to 3,500 tons per day; 2) Increase the area of the SWFP to 21.9 acres to include the entire lease area; 3) Permit for the production of compost by means of windrow composting of greenwaste at a capacity up to 200 tpd; 4) Permit the chipping and grinding of green and woody waste for the production of mulch, biofuel, soil amendments, and greenwaste ADC at a capacity up to 300 tpd; 5) Permit the storage of construction/demolition wastes at a capacity of up to 300 tpd; and 6) Increase the hours of operation for the acceptance of incoming material to 6:00 a.m. to 6:00 p.m. Monday through Saturday.

Notice of Intent to Adopt a Mitigated Negative Declaration and Environmental Assessment No. EHTS 2009-02

Riverside County
Waste Management Department

Hans W. Kernkamp, General Manager-Chief Engineer

FILED
RIVERSIDE COUNTY
NOV 23 2009
LARRY W. WARD, CLERK
By [illegible] Deputy

Notice of Intent to Adopt a Mitigated Negative Declaration
For the Edom Hill Transfer Station Solid Waste Facility Permit Revision Project
Environmental Assessment No. EHTS 2009-02

Date:	November 23, 2009
To:	Agencies and All Interested Persons
Project Name:	Edom Hill Transfer Station Solid Waste Facility Permit Revision Project
Project Location:	70-100 Edom Hill Road, Cathedral City, CA, east of the City of Cathedral City and north of Interstate-10.

The Riverside County Waste Management Department, on behalf of Riverside County as Lead Agency, has determined that the proposed Edom Hill Transfer Station Solid Waste Facility Permit Revision Project will not have a significant effect on the environment with the implementation of mitigation measures and recommends that a Mitigated Negative Declaration (MND) for Environmental Assessment (EA) No. EHTS 2009-02 be adopted.

The Project is a proposal to revise the Edom Hill Transfer Station SWFP to: 1) Increase permitted maximum daily tonnage to 3,500 tons per day; 2) Increase the area of the SWFP to 21.9 acres to include the entire lease area; 3) Permit for the production of compost by means of windrow composting of greenwaste at a capacity up to 200 tpd; 4) Permit the chipping and grinding of green and woody waste for the production of mulch, biofuel, soil amendments, and greenwaste ADC at a capacity up to 300 tpd; 5) Permit the storage of construction/demolition wastes at a capacity of up to 300 tpd; and 6) Increase the hours of operation for the acceptance of incoming material to 6:00 a.m. to 6:00 p.m. Monday through Saturday.

The MND and EA No. EHTS 2009-02 are available for public review at the following locations: Riverside County Waste Management Department website at www.rivcowm.org or at 14310 Frederick Street in Moreno Valley and Riverside County Clerk at 2724 Gateway Drive in Riverside from 7:30 AM to 4:30 PM, Monday through Friday. The documents have also been sent to the following libraries, but these libraries should be called directly for hours and availability of documents: Cathedral City Public Library, 33-520 Date Palm Drive in Cathedral City (760.328.4262); Desert Hot Springs Public Library, 11691 West Drive in Desert Hot Springs (760.329.5926); Palm Desert Public Library, 73-300 Fred Waring Drive in Palm Desert (760.346.6552); and City of Riverside Main Library, 3581 Mission Inn Ave. in Riverside (951.826.5201).

COUNTY CLERK
Neg Declaration/Ntc Determination
Filed per P.R.C. 21152
Posted

Any comments on the proposed project, the determination to adopt a MND, or requests for more information should be directed to:

Riverside County Waste Management Department
14310 Fredrick Street, Moreno Valley, California 92553
Attention: Ryan Ross, Planner IV
Telephone: (951) 486-3200 Fax: (951) 486-3205
Email: rmross@co.riverside.ca.us

NOV 23 2009
Removed: 12.24.09
By: [illegible] Dept.
County of Riverside, State of California

Written comments must be received at the above address by noon on December 22, 2009. Any written comments received will be forwarded to the Riverside County Board of Supervisors and will be considered, along with the EA and any oral testimony, before any action is taken on the project. The Board of Supervisors may consider this project on or after January 12, 2010. Any decision made by this body will be mailed to anyone requesting such notification.

RIVERSIDE COUNTY WASTE MANAGEMENT DEPARTMENT
Hans Kernkamp, General Manager – Chief Engineer

Ryan Ross, Urban/Regional Planner IV

14310 Frederick Street • Moreno Valley, CA 92553 • (951) 486-3200 • Fax (951) 486-3205 • Fax (951) 486-3230
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Solid Waste Facility Permit Revision
For
Edom Hill Transfer Station

Environmental Assessment EHTS 2009-02

November 2009

Riverside County Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

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1. INTRODUCTION

1.1. PURPOSE AND USE

1. The purpose of Environmental Assessment ("EA") EHTS-2009-02 is to describe the proposed project, identify potential environmental impacts, and present feasible mitigation measures that would cause adverse environmental effects caused by the proposed project to be reduced below a level of significance. The "project" addressed in this EA involves a proposed revision to the Solid Waste Facility Permit (SWFP) for the Edom Hill Transfer Station (EHTS), an existing facility located in western Coachella Valley of unincorporated Riverside County, California, immediately north and west of the City of Cathedral City.

2. The County of Riverside, as Lead Agency, and other responsible and regulatory agencies with approval authority over the project, will use EA EHTS-2009-02 to make informed decisions concerning the intended use and operation of the EHTS.

1.2. COMPLIANCE WITH CEQA

1. EA No. EHTS 2009-02 has been prepared in accordance with the California Environmental Quality Act ("CEQA") Guidelines (Section 15000 et seq.) and will be used to satisfy the requirements of CEQA Guidelines Section 15063, "Initial Study."

2. Riverside County Waste Management Department (RCWMD), on behalf of the County of Riverside as Lead Agency, has determined that, with implementation of the mitigation measures described herein, the project will not have a significant effect on the environment and recommends that a Mitigated Negative Declaration (MND) be adopted.

3. EA EHTS-2009-02 is subject to a 30-day public review period by responsible and trustee agencies and interested public. All responses and comments received during this time period will be presented to the County of Riverside Board of Supervisors at the time this body considers the project.

4. Additional environmental information regarding the project and the current facility operation is contained in the following environmental documents that are available at the Riverside County Waste Management Department located at 14310 Fredrick Street, Moreno Valley, CA and incorporated herein by reference.

    - Environmental Impact Report ("EIR") for Edom Hill Landfill Expansion, January 1997, State Clearinghouse (SCH) No. 95102064.

    - Revised EA No. 38595, SCH No. 2002051067, for the Edom Hill Transfer Station, which evaluated the potential environmental impacts associated with the development of the current transfer station with a total permitted capacity of 2,600 tons per day, for which a Mitigated Negative Declaration was adopted by the BOS on August 13, 2002.

    - Addendum to Mitigated Negative Declaration for Revised EA No. 38595 for the Edom Hill Transfer Station approved by the BOS on August 24, 2004.

2. PROJECT DESCRIPTION

2.1. PROJECT LOCATION

1. The EHTS is located on approximately 21.9 acres, primarily situated within the property limits of the closed Edom Hill Landfill, which is located at 70-100A Edom Hill Road, immediately east of Cathedral City limits in an unincorporated area of eastern Riverside County (refer to Exhibit 1, Regional Location Map).

2. The project site is accessed from Interstate 10 via Date Palm Drive, north to Varner Road, northwest to Edom Hill Road, and east to Edom Hill Landfill (refer to Exhibit 2, Project Vicinity Map).

3. The project site is located in the northwest quarter of Section 26, Township 3 South, Range 5 East of the San Bernardino Base and Meridian and can also be described as a portion of Riverside County Assessor's Parcel Numbers (APNs) 659-200-002 and 659-180-027. Facility coordinates are 33° 53' 07" N, -116° 26' 24" W. Its address is 70-100A Edom Hill Road, Cathedral City, CA.

2.2. ZONING/LAND USE

1. The majority of the project site is located within unincorporated area of Riverside County and is zoned W-2-20 (Controlled Development, 20-Acre Minimum). According to the North City Specific Plan (NCSP), adopted by the City of Cathedral City (City) in July 2009, RCWMD owned land within the boundaries of the City is zoned Edom Hill-Light Industrial (EH-LI).

2. The project site is a relatively flat pad, located just south of the entrance to the closed Edom Hill Landfill. A second pad has been constructed immediately west of the transfer station for the processing of Organics and storage of Construction & Demolition (C&D) wastes. This pad is approximately five feet lower than the transfer station pad.

3. The predominant land use surrounding the project site is the closed Edom Hill landfill and vacant open space. The Desert Solutions, Inc. (DSI) composting site is located northwest of the project site. It is the site of the former Whitefeather Farms Compost Facility. DSI has received approval from the City of Cathedral City to develop an in-vessel composting operation at the site, but has not yet begun operation. Wind turbines are located on the north side of Edom Hill Road west of the facility. All other surrounding properties are vacant.

2.3. PROJECT BACKGROUND

1. The Edom Hill Landfill, which had been in operation since 1967, ceased operation at the end of 2004.

2. The closed Edom Hill Landfill property encompasses approximately 435 acres, of which 420 acres are located within the unincorporated limits of Riverside County and 15 acres are located within the corporate limits of Cathedral City. Approximately 317 acres of the landfill site has been disturbed by previous landfill activities.

3. The existing EHTS is located on approximately 21.9 acres of disturbed land south of the landfill entrance. The EHTS does not include any portion of the 148-acre landfill disposal footprint.

Existing Maximum Daily Tonnage Breakdown		Proposed Tonnage
MSW	2,300	2,650
Greenwaste	200	500
C&D	90	300
Recycling	10	50
Total	**2,600**	**3,500**

- Increase the permitted area of the SWFP from 8.4 acres to 21.9 acres, to include the entire lease area including the Organics/C&D Processing/Storage Area.

- Permit for the production of compost by means of windrow composting of greenwaste at a capacity up to 200 tpd, in accordance with the requirements and standards incorporated in a Report of Compost Information (RCI), an added component of the facility's TPR.

- Permit the chipping and grinding of 300 tpd of green and woody waste for the production of mulch, biofuel, soil amendments, and greenwaste ADC in accordance with Rule 1133.1 of the South Coast Air Quality Management District (SCAQMD); therefore, maximum permitted greenwaste processing capacity is 500 tpd.

- Revise the format of the TPR to conform to the format of Title 14 of the California Code of Regulation (CCR).

- Permit the storage of construction/demolition wastes in the C&D Storage Area at a capacity of up to 300 tpd.

- Change the hours of operation for the acceptance of incoming material to 6:00 a.m. to 6:00 p.m. Monday through Saturday.

2.4.1. TRANSFER AND RECYCLING FACILITY

1. The EHTS is a transfer and recycling facility that consists of a prefabricated metal structure with a square footage of approximately 40,000 square feet and approximately 30 feet in height. It includes an enclosed tipping floor, a load-out area, storage areas for recovered materials and recyclables, four (4) access doors for ingress and egress of vehicles delivering MSW to the facility, and a below-grade two-bay load out tunnel.

2. The transfer facility tipping floor has a design capacity of 3,200 tons based upon available temporary floor storage within the structure.

2.4.2. ORGANICS & C&DWASTE PROCESSING/STORAGE AREA

1. The existing Organics & Construction/Demolition Processing/Storage Area is approximately 3.6 acres in size located immediately west of the transfer station building (refer to Exhibit 4, Organics & Construction/Demolition Processing/Storage Area). It includes an approximate 2.7 acre paved pad for organics tipping and processing, as well as the production of compost and soil amendments. All composting/soil amendment activities, as well as storage of compost/soil amendments, will take place on protected surfaces. The remaining approximate 40,000 square foot area is covered in gravel. Approximately 8,000 square feet will be used

along an elevated sort line to remove any contaminants. The cleaned material is placed in a horizontal grinder and ground to a consistent size. All incoming green waste is processed within 48 hours of receipt.

8. Organics entering the site through landscape contractors or the general public (self-haul) are inspected on the tipping pad to remove any contaminants and loaded into a horizontal grinder for processing.

9. "Fines" may be used in the production of soil amendments and/or compost. Larger woody materials may be used as mulch or sent to energy plants for use as fuel.

10. Up to 300 tpd of the green and woody waste feedstock will be chipped and ground to produce mulch, biofuel, soil amendments, and greenwaste ADC. On-site storage of the chipped and ground greenwaste will be conducted in accordance with the time limits established in Rule 1133.1 of the South Coast Air Quality Management District (SCAQMD).

11. Up to 200 tpd of processed green and woody waste feedstock will be composted in open windrows within the existing soil amendment production area under the revised SWFP. The facility will process up to 50 tpd as full compost (60-90 day cycle) and 150 tpd as an intermediate compost product (soil amendments at 21-45 day cycle). No food waste will be used in the compost feedstock.

12. Soil amendments will be produced by creating static piles of processed organic materials and mixing it with soil or other products to create specific end products. The production process involves blending processed green and woody waste with various earth materials, including, but not limited to, clean soil and gypsum, and then curing of the mixed feedstock materials in static piles for a time period from 15 to 45 days. Once cured, the soil amendment is transferred to secondary users or retail markets. Soil amendments are tested for pathogens and heavy metals in compliance with CCR 14, Chapter 3.1, Article 7.

13. The greenwaste composting feedstock will be prepared to achieve a carbon to nitrogen (C/N) ratio that can facilitate low emissions of volatile organic compounds (VOC), a proper initial moisture content, a necessary air-filled pore space or density by mixing with the appropriate bulking agents. The prepared feedstock is then constructed to form windrows, each measuring approximately 90' to 100' in length, 30' in width, and 8' to 10' in height. Periodic turning of the composting windrows will be performed to ensure aerobic decomposition of the organic matters.

14. The greenwaste compost that has gone through the active composting phase will be moved to an adjacent area for curing to form finished compost. Periodic turning of the curing compost will be performed, as necessary.

15. The estimated daily maximum intake capacity at full operation of the organic processing facility is 500 tons per day.

16. Greenwaste composting operation will be permitted and performed in accordance with the composting operations regulatory requirements of Title 14, Division 7, Chapter 3.1.

17. Personnel for handling greenwaste composting will be trained, in accordance with the requirements set forth in CCR, Title 14, Section 17867.5

- Two (2) 75-foot, electronically operated scales
- Material recovery equipment and systems
- Spare parts storage
- Office facility
- Fuel facilities for fueling EHTS equipment and vehicles
- Parking for transfer trucks, visitors, and employees
- Incidental storage areas
- A 100,000 gallon water tank for fire suppression

2.5. PROJECT OPERATIONS

1. The EHTS is open Monday through Saturday from 6:00 a.m. to 6:00 p.m. for incoming waste, and on Sunday for self-haulers from 1:00 p.m. to 5:00 p.m. Hours for outbound waste are 4:30 a.m. to 11:00 p.m. The facility will be closed to observe the following holidays: Memorial Day, Independence Day, Labor Day, Easter, Thanksgiving, Christmas, and New Year's Day.

2. Waste for disposal will be transferred to either the Lamb Canyon Landfill or the Badlands Landfill Monday through Saturday during each landfill's operating hours. Residual waste from the facility may also be transported to the El Sobrante Landfill, owned and operated by Waste Management, Inc., subject to RCWMD approval.

3. The transfer station and organics processing facility have adequate supervision and a sufficient number of qualified personnel onsite as needed for maintenance, equipment repair, cleaning, or other requirements to ensure proper operation, in compliance with applicable laws, regulations, and permit conditions.

4. All commercial collection trucks and self-haul vehicles stop at the scale house at the main entrance. The scale house attendant visually inspects loads for unacceptable wastes (i.e., hazardous waste) and visually inspects to ensure that all incoming loads are tarped or otherwise covered. Uncovered loads are charged an additional fee.

5. Vehicles delivering wastes and recyclables to the facility are weighed at the scalehouse using a State-certified scale. Each commercial collection truck are tracked through a computerized identification system that registers the date, time, company name, vehicle identification number, vehicle weight, waste material weight, and the origin/source of waste.

6. To promote efficiency and safety, commercial collection vehicles are segregated from self-haul vehicles when entering the transfer station. Commercial collection vehicles and self-haul customers use different access doors and have separate unloading areas on the tipping floor. All vehicles delivering greenwaste or C&D wastes are diverted around the south end of the transfer station to designated tipping areas on the organics/C&D tipping pad where the different vehicle types have separate unloading areas.

a neat and clean appearance. The entrance/exit areas are cleaned as necessary to prevent tracking or off-site migration of waste materials. Special emphasis is placed on the collection of external litter. Any illegally or indiscriminately dumped material attributable to the operation of the EHTS along the primary delivery routes of Date Palm Drive/Palm Drive to Varner Road to Edom Hill Road is retrieved at least twice weekly.

2.6. PROJECT OBJECTIVES

1. The EHTS is intended to meet the following objectives:

   - Provide a convenient, environmentally acceptable, and cost-effective facility to provide solid waste disposal and processing in western Coachella Valley.

   - Assist in meeting the landfill diversion goals in AB 939 (Assembly Bill 939 *et seq.*, California Integrated Waste Management Act of 1989) and the Riverside Countywide Integrated Waste Management Plan to preserve landfill capacity by recovering a portion of recyclable material from the waste stream for transport to either recycling facilities or markets and accepting green waste, woody wastes, and construction/demolition wastes for onsite processing and recovery.

   - Assist in carrying out the goals identified in the Source Reduction Recycling Elements and Household Hazardous Waste Elements for the jurisdictions using the EHTS.

   - Contribute to the CIWMB's effort to divert 50% of the state's organic wastestream from landfill disposal, as specified in Strategic Directive 6.1.

   - Promote public awareness of the benefits of recycling of solid waste.

   - Identify and encourage the development of markets for recycled products.

   - Provide a safe and convenient method for collecting ABOP-type HHW.

   - Intercept hazardous waste in the waste stream prior to landfill disposal.

   - Produce marketable organic products for sale and/or reuse.

   - Provide additional diversion options for greenwaste.

2.7. PERMITS AND APPROVALS

1. The proposed project will be required to obtain the following permits and/or approvals from the agency identified:

   - Initial Study/Mitigated Negative Declaration ***(County of Riverside)***

   - Waste Discharge Requirements, if required ***(Regional Water Quality Control Board)***

   - Non-Disposal Facility Element Amendment, ***(Riverside County Waste Management Department, Riverside County Solid Waste Advisory/Local Task Force, and California Integrated Waste Management Board (CIWMB))***

3. ENVIRONMENTAL ISSUES ASSESSMENT

3.1. EA CHECKLIST

1. The environmental issues associated with the proposed SWFP revision for the EHTS, were determined by responding to the EA Checklist.

2. The EA Checklist is composed of questions to assess the project's level of impact, or significance of impact, and to determine whether a Negative Declaration ("ND"), a Mitigated Negative Declaration ("MND"), or an Environmental Impact Report ("EIR") is required for the proposed project.

3. For each question in the EA Checklist, there are four (4) possible responses:

   - **Potentially Unavoidable Significant Impact**, which means that a potentially significant impact may not be avoided through the implementation of mitigation measures, and an EIR may be required;

   - **Less Than Significant Impact After Mitigation**, which means that an impact, while potentially significant, can be reduced to below a level of significance with the implementation of mitigation measures, as established by the County of Riverside or other regulatory agency through General Plan, ordinances, or adopted regulations or policies;

   - **Less than Significant Impact**, which means that a potential impact is below a level of significance, without the implementation of mitigation measures; and,

   - **No Impact**, which means that the project will not result in any impact to the environment.

4. Each environmental issue identified in the EA Checklist is further discussed and assessed in Section 3.2 (Environmental Impact Assessment). The results of the Environmental Impact Assessment, which include mandatory findings of significance and an environmental impact determination, are identified in Section 3.3 (Conclusions).

		Potentially Unavoidable Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
g)	Expansive soils?				√
h)	Unique geologic or physical features?				√
4. WATER. Would the project result in:					
a)	Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?			√	
b)	Exposure of people or property to water related hazards such as flooding?		√		
c)	Discharge into surface waters or other alteration of surface water quality (e.g., temperature, dissolved oxygen, or turbidity)?		√		
d)	Changes in the amount of surface water in any water body?				√
e)	Changes in the course or direction of water movements?				√
f)	Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?			√	
g)	Altered direction or rate of flow of groundwater?				√
h)	Impacts to groundwater quality?		√		
i)	Substantial reduction in the amount of groundwater otherwise available for public water supplies?			√	
5. TRANSPORTATION/CIRCULATION. Would the project:					
a)	Result in increased vehicle trips or traffic congestion?			√	
b)	Result in hazards to safety from design features or incompatible uses?				√
c)	Result in inadequate emergency access or access to nearby uses?				√
d)	Result in insufficient parking capacity on-site or off-site?				√
e)	Result in hazards or barriers for pedestrians or bicyclists?			√	
f)	Conflicts with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				√

		Potentially Unavoidable Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
d)	Would the project expose people or property to hazards from proposed, existing, or abandoned quarries or mines?				√
9.	**PUBLIC HEALTH AND SAFETY** - Would the project involve:				
a)	A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?		√		
b)	Possible interference with an emergency response plan or emergency evacuation plan?		√		
c)	The creation of any health nuisances or potential health hazards, such as litter & vector problems?		√		
d)	Increased fire hazard in areas with flammable brush, grass, or trees?				√
10.	**NOISE** - Would the project result in:				
a)	Increased noise levels?			√	
b)	Exposure of people to severe noise levels?		√		
11.	**PUBLIC SERVICES** - Would the project have an effect upon or result in a need for new or altered governmental services in any of the following areas:				
a)	Fire protection?		√		
b)	Police protection?				√
c)	Schools?				√
d)	Maintenance of public facilities, including roads?			√	
e)	Health services?				√
12.	**UTILITIES AND SERVICE SYSTEMS** - Would the project result in a need for new systems or supplies or substantial alterations to the following utilities:				
a)	Power or natural gas?				√
b)	Communications systems?				√

3.2. ENVIRONMENTAL IMPACT ASSESSMENT

Each of the environmental issues identified in Section 3.1 (EA Checklist) are further assessed in this section. Existing conditions, potential impacts, and mitigation measures, if required, are identified and discussed.

3.2.1. LAND USE AND PLANNING

a) Would the project conflict with the General Plan and zoning?

According to the Riverside County General Plan (adopted by the Riverside County Board of Supervisors on October 7, 2003), the project site is designated as "PF" (Public Facilities) on the Western Coachella Valley Area Plan – Land Use Map. The EHTS offers essential solid waste services to the County and its cities, which is consistent with this land use designation and the General Plan.

The Riverside County Waste Management Department is a public agency and the project proponent. As such, the proposed project is deemed a "public project" under the provisions of Section 18.2.a.b.(1) of the Riverside County Land Use Ordinance No. 348, which states, in part, that "no federal, state, county or city governmental project shall be subject to the provisions of this ordinance." The project is, therefore, not subject to the zoning requirements. It can be noted, however, that the majority of the project site is zoned W-2-20 (Controlled Development Areas – 20 acre minimum lot size), which identifies "Disposal Service Operations" as being conditionally permitted within this zone. The project is not in conflict with the Riverside County Land Use Ordinance.

While the Organics & Construction/Demolition Processing Area is located within the City of Cathedral City (City) limits, the RCWMD and the City entered into the EHTS City Mitigation Agreement, dated November 5, 2002, and amended April 21, 2009, that states future expansion/enhancements of the EHTS within City limits is subject to COUNTY standards and plan review. Therefore, the proposed project would not conflict with General Plan and zoning.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

b) Would the project conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project?

Riverside Countywide Integrated Waste Management Plan ("CIWMP"):

The EHTS is consistent with the goals and policies of the CIWMP. By offering a buy-back/drop-off center for recyclable commodities, the facility promotes the benefits of recycling. The transfer station also accepts some source-separated recyclables and will provide for some separation and sorting of easy-to-segregate and/or valuable recoverable materials from the MSW delivered to the EHTS. The processing and recovery of greenwaste, woody wastes and C&D wastes also promote recycling efforts and reduce the volume of wastes that must be transferred to regional landfill for disposal. These efforts serve to preserve landfill capacity and assist the jurisdictions it serves in meeting mandated diversion goals (Assembly Bill 939 et seq.). The EHTS provides a convenient, environmentally acceptable, and cost-effective facility for solid waste disposal and processing in the western Coachella Valley area, significantly reducing the number of vehicle miles that would be traveled to a regional landfill, significantly reducing the air

d) Would the project be affected by a city sphere of influence or located adjacent to a city or County boundary?

The EHTS is located in unincorporated Riverside County, immediately adjacent to the eastern boundary of Cathedral City corporate limits. The proposed Organics/C&D Processing/Storage Area is located within the City of Cathedral City on property owned by Riverside County. Although a portion of the site is located within the City of Cathedral City, the facility is owned by Riverside County and not subject to City ordinances/regulations. Furthermore, the County and City entered into a mitigation agreement following the approval of the EHTS, dated November 5, 2002, and amended April 21, 2009, that identified County standards and County plan review would be applied for future expansion or enhancements at EHTS for development within City limits.

FINDING: Less Than Significant Impact

e) Would the project affect agricultural resources or operations?

The project site is not designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. In addition, no properties surrounding the site are so designated. Therefore, the proposed project will not affect agricultural resources or operations.

FINDING: No Impact Is Identified, and No Mitigation Will Be Needed

f) Would the project disrupt or divide the physical arrangement of an established community, including a low income or minority community?

The closest residential community is located approximately one mile north of the site. The EHTS is accessed using the established circulation networks traditionally used for accessing the Edom Hill Landfill. Expansion of the project activities will not create infrastructure or structures that will disrupt or divide the physical arrangement of an established community.

FINDING: No Impact Is Identified, and No Mitigation Will Be Needed

3.2.2. POPULATION AND HOUSING

a) Would the project cumulatively exceed official regional or local population projections?

The EHTS expansion will not cumulatively induce growth, causing any impact to population projections. The slight increase in employment, approximately ten additional employees, will not result in a significant increase in population.

FINDING: No Impact Is Identified, and No Mitigation Will Be Needed

b) Would the project induce substantial growth in an area either directly or indirectly, that is, induce growth in an undeveloped area or extension of major infrastructure?

The proposed project is an expansion of internal operations at an existing facility. The increase in permitted tonnage allows the site to provide a waste transfer and recycling facility capable of meeting the future needs of the Coachella Valley. The addition of organics and construction/demolition waste processing and recovery assists the local jurisdictions in meeting

Organics/C&D Processing/Storage Area is a paved pad with no new buildings that would require seismic compliance.

According to the Riverside County General Plan, the project site is not located within an area of potential liquefaction. In addition, the risk of liquefaction is highly unlikely, because the depth to groundwater on the Edom Hill Landfill property ranges from 250 feet to more than 1,000 feet.

MITIGATION MEASURES:

S-1 Following a seismic event, the operator of the transfer station shall examine the building and ancillary structures for structural damage. Any structural damage that affects the integrity of the structure(s) or the safety of the public either working or using the facility shall be repaired to conform to the applicable local, state, and federal building and safety codes and regulations. The operator shall also inspect the Organics/C&D Processing/Storage Area to check for cracks and other damage and repair as necessary.

S-2 The operator of the transfer station shall be required to update any contingency plans to account for new contingency measures necessary for the new operations proposed in the event of risk of upset for approval by the appropriate regulatory agencies.

S-3 Following a seismic event, the operator shall examine the hazardous waste storage containers and boxes to determine if spillage has occurred. In the event of a spill, cleanup of the area must be performed expeditiously, in accordance with procedures set forth in an approved hazardous waste spill contingency plan.

FINDING: Less Than Significant Impact After Mitigation

c) Would the project result in or expose people to potential impacts involving seiche, tsunami, or volcanic hazard?

The project site is not subject to seiche, tsunami, or volcanic hazard.

FINDING: No Impact Is Identified, and No Mitigation Will Be Needed

d) Would the project result in or expose people to potential impacts involving landslides, mudflows, or rockfall?

The EHTS is located on the closed Edom Hill Landfill site. Slope stability issues associated with the closure of the Edom Hill landfill have been properly addressed in both the post closure grading plan and the final design and construction of the transfer station. There are no known landslides at the project site.

FINDING: Less Than Significant Impact

to the desert washes after heavy storms. Ponding of water is also extremely rare due to the pervious nature of the area's sandy soils.

Changes to absorption rates, drainage patterns, and the rate and amount of surface runoff are not expected because no new buildings will be constructed under the project. The Organics/C&D Processing/Storage Area is paved to prevent or minimize water infiltration, this is not expected to cause significant changes to ground absorption rates or the amount and rate of surface runoff for the following two reasons. (a) The paved surface was constructed to drain into treatment systems using Best Management Practices for removal of physical pollutants before discharging into the public storm drain system as controlled surface runoff. (b) The reduced absorption rate from surface paving is expected to be offset by absorption of precipitation by the greenwaste feedstock, soil amendment materials, and compost being stockpiled within the paved area.

Furthermore, a detention basin has been designed and constructed to collect any flow from the organics tipping pad and reduce the offsite discharge to that of the pre-development condition. Therefore, impacts to absorption rates, drainage patterns, or the rate or amount of surface runoff are considered insignificant.

FINDING: ***Less Than Significant Impact***

b) Would the project result in exposure of people or property to water-related hazards such as flooding?

According to the Riverside County Comprehensive General Plan, the project is not located within a 100-year flood plain or in a dam inundation area, which would expose people or property to water-related hazards, such as flooding. The project site is also protected from surface water from the adjacent landfill by a network of drainage structures that include interceptor ditches, downdrains and perimeter channels that conduct run-on and run-off to outlet points in either the sedimentation basin to the northeast of the existing scale house or in the existing sedimentation basin at the toe of the west landfill slope. Run-on to the landfill from the south is intercepted by perimeter channels and directed to release points downstream of the landfill. In addition, the project's drainage/stormwater control facilities have been designed and constructed to comply with Riverside County Flood Control standards, in order to protect the integrity of roads and structures, to protect public health, and to prevent safety hazards and interference with transfer station operations.

A detention basin has been designed and constructed at the release point for stormwater from the organics tipping pad. The basin is designed to detain increased runoff resulting from the construction of the paved tipping pad to allow for the release of stormwater into the accepting watercourse at a rate similar to that prior to construction of the pad.

MITIGATION MEASURE:

W-1 Drainage and stormwater control facilities shall be constructed and maintained in full compliance with drainage/stormwater control plans and conditions, as approved by the Riverside County Flood Control and Water Conservation District and the Regional Water Quality Control Board.

FINDING: ***Less Than Significant Impact After Mitigation***

W-5 Exterior surfaces will be cleaned using a street sweeper or other mechanical means, as required, to reduce on-site accumulation of oil and fluids.

W-6 All truck and equipment maintenance will be conducted over impermeable surfaces, with curb if deemed necessary.

W-7 Future compost activities shall comply with all requirements of the Regional Water Quality Control Board, including the submittal of a Report of Waste Discharge, if required.

W-8 The hazardous waste storage area will be maintained in a manner that contains any spills within a confined area.

FINDING: ***Less Than Significant Impact After Mitigation***

d) Would the project result in changes in the amount of surface water in any water body?

On-site drainage has been designed to prevent an increase in surface water runoff. In addition, there are no water bodies in proximity of the proposed project.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

e) Would the project result in changes in the course or direction of water movements?

The project's drainage facilities have been designed and constructed to conform to the existing drainage patterns. The project will not result in a change to the course or direction of water movements.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

f) Would the project result in changes in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?

The EHTS uses water from a County-owned well (located northwest of the site, near the Willow Hole Area) that is connected to the property via a water line. A 100,000-gallon water tank has been installed onsite to meet fire flow requirements. Bottled water is provided, as needed, for drinking. The existing operation uses approximately 2,000 gallons of water daily for dust control. It is estimated that the proposed project will use approximately 8,000 gallons a day for dust control and organics processing, resulting in a net increase of 6,000 gallons/day. In 2008, a total of 395,207 acre-feet (af) was used in the Coachella Valley[1]. The proposed project would only account for 0.002%[2] when compared to water usage for the Coachella Valley in 2008. Therefore, water usage at EHTS is inconsequential given the total water used throughout the Coachella Valley. The proposed project will not result in cuts or excavations into an aquifer.

[1] *2008-09 Annual Review & Water Quality Report*, Coachella Valley Water District

[2] 6,000 gal/day x 358 operating days= 2,148,000 gal/yr. 2,148,000 gal = 6.6 af. (1 af = 325,851gal). (6.6af/395,207af x 100)= 0.00167%

3.2.5. TRANSPORTATION/CIRCULATION

In order to analyze and assess traffic impacts from the proposed project, a Traffic Impact Analysis (TIA) was prepared by Kunzman Associates, dated September 29, 2009. The TIA contains documentation of existing traffic conditions, traffic generated by the project, distribution of the project traffic, and an analysis of future traffic conditions. The findings and conclusions within the TIA were used to address the Project's potential impacts on transportation/circulation.

a) Would the project result in increased vehicle trips or traffic congestion?

The proposed project will increase the amount of tonnage received at the EHTS from 2,600 tpd to 3,500 tpd. This increase in daily tonnage will generate additional vehicle trips. As shown in Table T-1, the project will result in an increase of 277 vehicles per day.

Table T-1
Summary of Project Vehicle Trips by Vehicle Type

EHTS	Vehicle Types					
	Small Self-Haul[1]	Large Self-Haul[2]	Collection Truck[3]	Transfer Truck[4]	Employees	Total Vehicles
Existing Project	313	102	282	109	14	820
Proposed Project	413	136	379	146	23	1097
Difference	100	34	97	37	9	277

1. Small self-haul vehicles- pick up truck, van, car, with or without trailer
2. Large self haul vehicles- landscaping/commercial vehicles, usually with trailer
3. Collection vehicles- waste collection trucks 'packer trucks'
4. Transfer Trucks- typically 23 ton capacity. Transfer trucks haul away outbound waste.

As shown in Table T-2, the existing operation is projected to generate approximately 3,186 daily vehicle trips in Passenger Car Equivalents (PCE's), for which 296 PCE's will occur during the morning peak hour and 264 PCE's will occur during the evening peak hour. The traffic volumes for the 2,600 tons per day permitted operation is a projection based upon empirical tonnage and traffic data for the existing operation.

The proposed project is projected to generate approximately 4,268 daily vehicle trips in PCE's, 399 PCE's of which will occur during the morning peak hour and 357 PCE's of which will occur during the evening peak hour. The proposed development compared to the existing operation is projected to generate approximately 1,082 more daily vehicle trips in PCE's, 103 more PCE's of which will occur during the morning peak hour and 93 more PCE's of which will occur during the evening peak hour.

These intersections were selected based on the traffic pattern that correlates to the geographical distribution of the origin of the waste stream. These intersections were approved for study as part of the Scoping Agreement with the Riverside County Transportation Department[3].

While the Lamb Canyon landfill receives the majority outbound MSW from EHTS, because the proposed project would not result in an increase of 50 additional peak hour trips to the Lamb Canyon landfill, intersections near the Landfill did not require analysis.

LOS Analysis

Some of the assumptions used in the LOS analysis included the following:

- The TIA assumed that the primary access to the project site for project-related traffic would be the I-10/Date Palm Drive intersection, traveling north to Varner Road and then northwesterly to Edom Hill Road.
- PCE's were computed with a factor of 1.5 for small self haul vehicles, 2 for vehicles with up to 3 axles, and 3 for vehicles with 4 or more axles
- The TIA study assumed a more conservative approach, assuming that the transfer station would reach 3,500 tpd by the year 2014.

Analysis

To determine the traffic distributions for the proposed project, peak hour traffic counts of the existing directional distributions of traffic for existing areas in the vicinity of the site, and other additional information on future development and traffic impacts in the area were reviewed. The MSW transfer trucks travel to one of three regional landfills: Lamb Canyon, Badlands, or El Sobrante. The recyclable transfer trucks travel to the Palm Desert facility. All other vehicles are anticipated to travel to/from the local area.

To assess **Existing Plus Ambient Growth Plus Project Plus Cumulative** traffic conditions, project traffic is combined with existing traffic, other development, and areawide growth. The proposed buildout capacity of 3,500 tons per day is proposed to be reached by year 2014. To account for areawide growth on roadways, traffic volumes have been calculated based on a "conservative" 2.0 percent annual growth rate of existing traffic volumes over a five (5) year period (year 2009 to year 2014).

As shown on Table T-3, the study area intersections are projected to operate at acceptable Levels of Service during the peak hours for **Existing Plus Ambient Growth Plus Project Plus Cumulative** traffic conditions, with improvements.

[3] Scoping Agreement for the preparation of the Traffic Impact Study was approved by the Riverside County Transportation Department on July 17, 2009.

b) Would the project result in hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The additional traffic from the proposed project will use existing roads and routes. The current condition of the access road to the EHTS is considered safe and adequate to accommodate project traffic. The proposed improvements in both the City Mitigation Agreement and NCSP will continue to improve safety along the Edom Hill Road.

Internal circulation on the EHTS site is designed to reduce cross traffic, thus reducing the potential for accidents. Incoming transfer trucks have exclusive access to the load-out tunnel of EHTS, which allows the trucks to enter and leave in one direction. This circulation design prevents transfer truck traffic from crossing paths with the general refuse-hauling traffic that is approaching or departing from the tipping floor.

Vehicles delivering organic or C&D materials are directed to the Organics/C&D Processing/Storage Area located west of the existing transfer station building. Facility traffic control operators direct the dumping activities. Therefore, the potential for hazards to safety from project design features is considered insignificant.

FINDING: Less Than Significant Impact

c) Would the project result in inadequate emergency access or access to nearby uses?

The EHTS is easily accessed from Edom Hill Road. The nearest land use along the road is an inactive composting facility, located adjacent to the landfill. The transfer station is situated inside the landfill property, and thus it will not result in blockage of emergency access to the landfill property or nearby uses..

FINDING: No Impact Is Identified, and No Mitigation Will Be Needed

d) Would the project result in insufficient parking capacity on-site or off-site?

There is ample employee, visitor, and handicapped parking provided on-site. The project site also provides on-site parking for transfer trucks. No overnight parking of commercial collection trucks is anticipated. No off-site parking is anticipated.

FINDING: No Impact Is Identified, and No Mitigation Will Be Needed

e) Would the project result in hazards or barriers for pedestrian or bicyclists?

The project site is located in a very remote area; no residences are located along Edom Hill Road. Therefore, the project will not result in hazards or barriers for pedestrians. According to the Riverside County General Plan, a Class I bike lane is designated along Varner Road. The General Plan identifies a Class I bike lane as a completely separated right-of-way for the exclusive use of bicycles. The additional traffic generated from the proposed project would not be significant enough to affect the bike lane. In addition to the lack of project generated traffic, Varner Road has been improved and/or is scheduled for improvements (asphalt overlays, turn pockets, and signalization) per the City Mitigation Agreement. The proposed improvements will continue to improve the design safety along Varner Road, thereby improving safety for all users, including bicyclists. Therefore, the project will not result in significant impacts to the safety of bicyclists.

Pollution Sources

Mobile source contributions dominate almost every pollution category. Mobile sources, primarily on-road vehicular emissions, produce a high percentage of nitrogen oxides (NO_X), which are the precursors to the high photochemical smog levels found in the summer in the desert communities of the basin. They also produce 98 percent of the carbon monoxide (CO) leading to high CO exposure (mainly in coastal environments) in the winter. Respirable particulates of 10 microns or less in diameter (fugitive dust/PM_{10}) derive mainly from agricultural tilling, re-suspension of roadway dust by passing vehicles, tire wear and abrasion, travel on unpaved surfaces, and from soil disturbance at construction projects. In the project region of Coachella Valley, blowsand is the major source of fugitive dust/PM_{10}. Although the project site is within the SSAB, most of the area's pollution problems are due to emissions from mobile sources transported from the South Coast Air Basin ("SCAB"). As a result, pollution emission patterns within the SCAB largely control the air quality environment in the Coachella Valley, with the exception of fugitive dust/PM_{10}.

Existing Air Quality within the Project Vicinity

The U.S. EPA has designated the Riverside County portion of SSAB as serious non-attainment for ozone, and PM_{10}. The basin has been designated by the State as non-attainment for ozone, and PM_{10}. The Riverside County portion of the SSAB is designated as in attainment of the Federal National Ambient Air Quality Standards (NAAQS) for $PM_{2.5}$, CO, NO_2, SO_2 and lead, as well as the California Ambient Air Quality Standards (CAAQS) for $PM_{2.5}$, CO, NO_2, SO_2, lead, hydrogen sulfide, and vinyl chloride.

Standards of Significance

This air quality analysis has been conducted in accordance with the 1993 California Environmental Quality Act (CEQA) Handbook prepared by the South Coast Air Quality Management District. The Handbook states that projects in the Coachella Valley that exceed the following emission standards should be considered as having an individually and cumulatively significant air quality impact.

Pollutant	**Threshold (lbs/day)**
Carbon Monoxide (CO)	550
Volatile Organic Compounds (VOC)	55
Nitrogen Oxides (NO_X)	55
Particular Matters (PM_{10})	150
Particular Matters (PM_5)	55
Sulphur Oxides (SO_X)	150

Beyond emissions magnitude, the SCAQMD also recommends that any relevant secondary evaluation criteria be applied to a proposed project. These additional indicators are as follows:

- Project could interfere with the attainment of the federal or state ambient air quality standards by either violating or contributing to an existing or projected air quality violation.

- Project could result in population increases within the regional statistical area which would be in excess of that projected in the AQMP.

traffic. Further, the EHTS is projected to generate less than 1,000 diesel truck trips, less than one tenth of the number that could cause a PM hot-spot

The project is not anticipated to cause or significantly contribute to any CO or particulate matter concentrations exceeding the AAQS along roadways serving the project. Therefore, the Project will not result in a significant local air quality impact along roadways serving the project

Short-Term Air Quality Impacts

The EHTS is an established land use and the proposed project will not require any construction or major grading; therefore, the project will not result in any short-term air quality impacts.

Long-Term Air Quality Impacts (Operation)

Operation of the project will include four distinct air pollutant sources, (1) vehicles traveling to and from the site (on-road vehicle emissions), (2) equipment used on the site for processing materials (on-site equipment emissions), (3) VOC emissions from the composting operations, and (4) Fugitive Dust.

On-Road Vehicle Emissions:

The trips were divided by vehicle type: collection truck, transfer truck, small self-haul, and large self-haul and by waste type: MSW, greenwaste, recyclables, and C&D waste. Trip lengths were estimated for each combination of vehicle type and waste type. The trip generation rates, trip length, and vehicle miles traveled for the existing conditions and with the proposed project conditions are presented in Table A-1 in the Appendix.

On-Site Equipment Emissions:

Table AQ-1 shows the existing and proposed equipment type and hours to be utilized in daily operations. Special equipment, such as a sweeper, may occasionally be brought to the facility to perform special jobs. However, they are not considered a part of the permanent equipment fleet.

Table AQ-1
Transfer Station Equipment Use

Location	Type	No.	Model	HP	Total Daily Hours	
					Exist	Proposed
Transfer Station	Wheeled Loader	2	Cat 966	262	20	22
Transfer Station	Skid Steer Loader	1	Cat 252B	71	9	11
Transfer Station	Skid Steer Loader	1	Bobcat S300	81	9	11
Greenwaste	Wheeled Loader	2	Volvo L120	241	6	8
Greenwaste	Horizontal Grinder - Diesel	1	-	1000	5	7
Greenwaste	Trommel Screen – Diesel	1	-	120	5	7

Greenwaste Composting Emissions

The project proposes increasing the organics processing to up to 500 tons per day. Currently the facility is permitted to process up to 200 tons of organics per day as a chipping and grinding operation. Composting is not currently permitted. Presently, the greenwaste materials remain on site for short periods consistent with SCAQMD Rule 1133.1. This rule limits the time the materials can remain on-site to prevent the inadvertent decomposition of the materials and

concern[7]. Therefore, this EA does not consider ammonia emissions from the Project an air quality issue

Fugitive Dust/ PM_{10}:

Since the operation of the transfer station will not involve earth-moving activity, sources of dust emissions will primarily be from the trash unloading, sorting, and re-loading activities, as well as greenwaste processing. These activities, however, have a very limited dust-generation capacity. Trash unloading, sorting, and re-loading activities will occur within the transfer building and are essentially not subject to the effect of the desert winds. While greenwaste processing occurs outside of the transfer building, moisture content is strictly controlled during greenwaste processing/composting. Established BMPs for greenwaste processing/composting ensure that piles are adequately maintained at appropriate moisture levels; therefore, the transfer station is not expected to generate fugitive dust/PM_{10} that would exceed the SCAQMD threshold for significance. Transfer station workers will be provided with protective devices to prevent breathing in the dust or PM_{10} emitted during the processing of trash and green waste. The EHTS is also equipped with a misting/ventilation system to control dust and odor. Furthermore, the operator of the EHTS shall continue to comply with Rule 403 and Rule 403.1 of the South Coast Air Quality Management District for fugitive dust.

Net Increase In Emissions Due to Project

The impact of the proposed project is measured against the net increase in emissions that would result due to the implementation of the proposed project. The total emissions from EHTS in 2014, the "opening year" of the project when the facility is expected to reach the maximum capacity of 3,500 tpd, was calculated with the facility operating as currently permitted and with the facility operating with the proposed permit revisions. Table AQ-2 displays the net emissions due to the project.

Table AQ-2
Net Increase in Emissions Due to Project

	Net Increase in Daily Emissions (lbs/day)					
Emissions Source	**CO**	**VOC**	**NO_x**	**PM_{10}**	**$PM_{2.5}$**	**SO_x**
Vehicles[1]	50.1	6.2	73.3	4.5	3.9	0.3
On-Site Equipment[2]	4.6	1.4	14.3	0.5	0.5	0.0
Greenwaste Composting[3]	0.0	154.1	0.0	0.0	0.0	0.0
Total Net Increase Due to Project	**54.7**	**161.7**	**87.6**	**5.0**	**4.4**	**0.3**
Significance Threshold	*550*	*55*	*55*	*150*	*55*	*150*
Exceed Threshold?	No	***Yes***	***Yes***	No	No	No

1. EMFAC2007 was used to calculate the emissions from on-road vehicles- see Table A-1 in Appendix.
2. The URBEMIS2007 program (version 9.4.2) was used to calculate the emissions from the materials processing equipment.
3. Table A-2 in the appendix presents the projected greenwaste processing and estimates of VOC emissions.

[7] CIWMB and SCAQMD, "Technical Summary Report, Best Management Practices for Greenwaste Composting Operations: Air Emissions Tests Vs. Feedstock Control and Aeration Techniques," July 2003.

2,600 tpd, as described in mitigation measure AQ-2. This will result in a decrease in NOX emissions of approximately 32.9 pounds/day.

Table AQ-3 presents the net increase in air pollutant emissions due to the project with the implementation of the two mitigation measures described above. With the mitigation measures described above, all significant impacts will be reduced to a level of insignificance and the project will not result in any unavoidable significant impacts.

Table AQ-3
Net Increase in Emissions Due to Project With Mitigation

	Net Increase in Daily Emissions (lbs/day)					
Emissions Source	**CO**	**VOC**	**NO_x**	**PM_{10}**	**$PM_{2.5}$**	**SO_x**
Vehicles[8]	41.7	3.9	40.4	2.6	2.2	0.3
On-Site Equipment	4.6	1.4	14.3	0.5	0.5	0.0
Greenwaste Composting	0.0	38.6	0.0	0.0	0.0	0.0
Total Net Increase Due to Project	**46.3**	**43.9**	**54.7**	**3.1**	**2.7**	**0.3**
Significance Threshold	*550*	*55*	*55*	*150*	*55*	*150*
Exceed Threshold?	No	No	No	No	No	No

MITIGATION MEASURES:

AQ-1 Where greenwaste is composted in static piles and where soil amendment production requires static piles formation for greater than 14 days, the material static piles shall be constructed with a layer of finished compost covering the entire surface area of the piles.

AQ-2 At a minimum, eleven transfer trucks that meet the US EPA 2007 heavy-duty truck emission standards shall be included in the facility's vehicle fleet prior to daily refuse received at the facility reaching 3,500 tons per day. These transfer trucks shall be phased into the facility's fleet according to the following schedule:

Operators of EHTS shall acquire and operate seven (7) transfer trucks that meet US EPA 2007 heavy-duty truck emission standards once daily tonnage consistently[9] exceeds 3,000 tpd, not to exceed 3,100 tpd. For each additional 100 tpd consistently received, operators of EHTS shall acquire and operate one (1) additional truck that meets US EPA 2007 heavy-duty truck emission standards.

[8] Of the 10,900 Transfer Truck Daily VMT, assumes eleven (11) US EPA 2007 rated transfer trucks traveling each 224 miles per day (approx. 3 round trips each to Lamb Canyon Landfill)
[9] 'Consistently' is defined as daily tonnage averaged over a consecutive three (3) week period.

and holidays. The absence of any SCAQMD citations for odor nuisance from existing operations indicates that the existing operational protocols are effective at curtailing odors. Therefore, odor-generating potential of the stored trash from the proposed project is expected to be limited.

Greenwaste Processing/Composting

The facility has developed an Odor Impact Minimization Plan (OIMP) for the existing greenwaste processing in compliance with Section 17863.4 of Title 14 California Code of Regulations. This plan will need to be updated to include the composting operations but the specific policies and procedures can remain largely unchanged. Composting can be a significant source of odors if the composting is allowed to occur under anaerobic conditions. Composting at EHTS will occur under aerobic conditions, which produces little odor. The existing OIMP discusses the need to monitor soil amendment piles and turn them for aeration to ensure aerobic composting of the materials.

The OIMP contains an Odor Monitoring Protocol and Complaint Response Protocol to detect and eliminate odors. These protocols allow managers to leave the site to determine the extent of odor migration if odors are detected on site. If off site odors are detected the source of the odor will be identified and corrective actions will be made. Corrective actions include, curtailing the activity causing the odor, processing unprocessed greenwaste that is causing the odor, or removing the material from the site and disposing it.

By continuing the odor minimization procedures currently implemented for the chipping and grinding operation and expanding the monitoring and regular turning of the compost piles, the potential for the composting operation to produce objectionable odors will be minimal. If odors are inadvertently generated, the Odor Monitoring and Complaint Response Protocols will ensure that any odor issues are dealt with in a timely and effective manner. Therefore, the greenwaste/composting operation is not projected to result in a significant odor impact.

MITIGATION MEASURES:

AQ-5 Residual MSW will be transferred on a daily basis. Waste that has not been transferred at the end of the day will be loaded into a transfer trailer(s), covered, and parked outside the transfer building. Additional capacity is available on the tipping floor. Residual waste will not remain at the facility unless the receiving disposal site is closed for a holiday at which time the waste will be transferred on the next business day.

AQ-6 The transfer station and project site will be cleaned daily to remove loose material and litter. The site and tipping areas will be swept regularly. Boxes, bins, and containers will be cleaned on a regular basis.

AQ-7 The operator of the transfer station shall comply with Rule 402 (Nuisance) of the South Coast Air Quality Management District to control nuisances, such as odor.

would be otherwise, if solid waste is directly taken to a landfill by the waste generators. This is translated into an indirect air quality benefit.

FINDING: ***No Impact Is Identified, and No Mitigation Measure Will Be Needed***

3.2.7. BIOLOGICAL RESOURCES

a) Would the project result in impacts to endangered, threatened, or rare species or their habitats (including, but not limited to, plants, fish, insects, animals, and birds)?

The project site is located on 21.9 acres within the disturbed Edom Hill Landfill property. The EHTS has been in operation since 2002 and due to historical activities and disturbance, no threatened or endangered species have been identified or are expected to occur on the project site. The project site is not located within or directly adjacent to a Conservation Area of the CVMSHCP, and no new buildings or structures are proposed. The Organics & Construction/Demolition Processing Area, located immediately west of the transfer station building, includes an existing 2.7 acre paved pad for organics tipping and processing, as well as the production of soil amendments. The proposed project will not result in disturbance of undisturbed lands. Therefore, the project will not result in impacts to endangered, threatened, or rare species or their habitats.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

b) Would the project result in impacts to wetlands and/or sensitive habitats (e.g., marsh, riparian, or vernal pool)?

There are no wetlands or other sensitive habitats located on the project site.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

c) Would the project result in impacts to wildlife dispersal or migration corridors?

Since the EHTS is an existing facility in operation since 2002 and the proposed project will not result in any new buildings or fencing, barriers, etc, the proposed project will not disrupt wildlife movements or migratory patterns.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

3.2.8. MINERAL RESOURCES

a) Would the project result in the loss of availability of a known mineral resource in an area classified or designated by the State that would be of value to the region or the residents of the State?

The State Mining and Geology Board (SMGB) in 1982 established Mineral Resources Zones (MRZ) to designate lands that contain mineral deposits. The State of California has also designated Aggregate Mineral Resource areas within the County. The Riverside County General Plan – Mineral Resources map identifies the project site (closed Edom Hill landfill property) and surrounding region with a classification of MRZ-3a, and describes it as an area where the available geologic information indicates that mineral deposits are likely to exist, and the

To minimize any potential risk of harm to public health and safety and any potential risk of an adverse effect on the environment, the project must to comply with all local, state, and federal ordinances and regulations that pertain to the handling, storage, and disposal of waste materials, including hazardous materials and fuel tanks. The transfer station operator is required to implement a hazardous waste screening and exclusion program, which includes load checking procedures, emergency response contingency plans, and employee training. The emergency response contingency plan contains procedures on how to handle hot or burning materials that may enter the site. A "hot load", if detected when delivered to the facility, is not accepted. In the event that it is inadvertently received, the "hot load" is spread out on the tipping floor to minimize further combustibility and extinguished. The load is left on the tipping floor to cool, then loaded into a transfer vehicle with other residual waste for disposal. In addition, the EHTS has been designed to house certain emergency equipment (i.e., fire extinguishers, eye wash, medical supplies, etc.) and protective devices. The current facility hazardous waste screening process and fire control plan will apply to the Organics/C&D Processing/Storage Area.

MITIGATION MEASURES:

PH-1 The facility operator shall maintain the following permits: 1) a small quantity hazardous waste generator permit (EPA Identification Number) from the Department of Toxic Substances Control, California Environmental Protection Agency; and, 2) Permit by Rule from the Department of Toxic Substances Control, California Environmental Protection Agency.

PH-2 The facility operator shall maintain its load check program to screen or salvage hazardous waste from the waste stream before it is transferred and disposed, which shall, at a minimum, include: a) visual load inspections at the scale house and on the tipping floor of the transfer station; b) hazardous waste handling, accumulation, labeling, storage and disposal, and licensing; c) employee training and certification; d) emergency response scenarios; and, e) the development of contingency plans (i.e., spill contingency plan and fire prevention plan), in compliance with local ordinances and state and federal regulations.

PH-3 Hazardous waste collected at the transfer station will be consolidated, stored in structurally sound, leak-proof containers, with proper containment and ventilation, and disposed in accordance with time frames and procedures established by the Permit by Rule from the Department of Toxic Substances Control. The hazardous waste storage box will be locked during non-operational hours.

PH-4 Fire suppression equipment (i.e., fire extinguishers, etc.) and other emergency safety and spill equipment, shall be maintained as required by the Riverside County Fire Department, the Riverside County Department of Environmental Health, or other regulatory agencies.

FINDING: Less Than Significant Impact After Mitigation

PH-7 The operator will be required to pickup any illegally or indiscriminately dumped material attributable to the operation of the Edom Hill Transfer Station along the primary delivery routes of Date Palm Drive/Palm Drive to Varner Road to Edom Hill Road at least twice weekly.

PH-8 The operator shall maintain litter fences along the perimeter of the project site to catch blown litter. Litter fences will be cleaned of blown litter on a regular schedule to maintain a neat and clean appearance.

PH-9 All boxes, bins, pits or other types of containers will be cleaned as needed.

PH-10 All vehicles delivering waste to the transfer station, and transfer vehicles leaving the facility are required to have covered loads.

PH-11 The facility operator shall be required to update its vector control plan, as approved by the Riverside County Environmental Health Department, to incorporate the Organics & Construction/Demolition Processing Area.

FINDING: ***Less Than Significant Impact After Mitigation***

d) Would the project involve fire hazard in areas with flammable brush, grass, or trees?

The project site is not located within a designated Fire Hazard Area, and the project site lacks vegetation that would be flammable.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

3.2.10. NOISE

a) Would the project result in increased noise levels?

The EHTS has replaced the Edom Hill Landfill that is located adjacent to the facility. The landfill had been in operation since 1967 and was considered part of the existing noise environment at the time the EHTS was constructed. The facility is open from the hours of 6:00 am to 6:00 pm for incoming waste, and 4:30 am to 11:00 pm for outbound waste. The majority of the noise generated occurs within the enclosed transfer building. This includes the backing and unloading of trucks and the use of heavy equipment to move materials on the tipping floor.

Activities associated with the Organics/C&D Processing/Storage Area occur outside. Noise generators in the area include vehicles delivering wastes, as well as onsite loaders, screens and grinders. However, there are no sensitive noise receptors in the general vicinity of the site. The closest sensitive receptor is rural residential development approximately one mile northwest of the facility. The closest receptor is the Desert Solutions, Inc. (DSI) composting operation, which will generate similar noise levels from its operations. Since DSI will generate similar noise levels to the EHTS Organics/C&D Processing/Storage Area, it will not be impacted by the proposed project and is considered a compatible land use. As a consequence, the noise associated with the proposed project is considered less than significant.

MITIGATION MEASURE:

PS-1 The facility operator shall maintain the onsite fire suppression system including fire extinguishers and the onsite water tank, and fire sprinkler system.

PS-2 The facility operator shall periodically update and maintain the Fire Response Plan for the facility.

FINDING: ***Less Than Significant Impact After Mitigation***

b) Would the project have an effect upon, or result in, a need for new or altered government services in police protection?

The proposed project should not significantly increase demand for police protection. The entire facility is enclosed in a 6-foot high chain link fence with gates.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

c) Would the project have an effect upon, or result in, a need for new or altered government services in schools?

The proposed project does not induce growth and will not result in a need for new or altered schools.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

d) Would the project have an effect upon, or result in, a need for new or altered government services in maintenance of public facilities, including roads?

The RCWMD and City entered into the EHTS City Mitigation Agreement, dated November 5, 2002, and amended April 21, 2009, that identified a series of road improvements to be completed by the City as a result of the construction of the EHTS. These improvements include the creation of turn pocket lanes on Varner Road, asphalt overlays, signalization of intersections, and constructing a climbing lane along Edom Hill Road. The additional vehicles resulting from the proposed project would not result in the need for new or altered government services in maintenance of roads above the improvements discussed in the Agreement.

FINDING: ***Less Than Significant Impact***

e) Would the project have an effect upon, or result in, a need for new or altered government services in health services?

The transfer station will employ up to 45 employees. Therefore, it is not expected that the project will create a burden on health services. In addition, there are sufficient safeguards (refer to Section 3.2.9, PUBLIC HEALTH AND SAFETY) required of the operation that will serve to reduce the risk of accidents and the need for health services.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

g) Would the project result in a need for new systems, or substantial alterations to local or regional water supply systems?

Water for the existing facility is provided by a County-owned well, transmission pipeline, and onsite water tank. Potable water is currently provided by bottled drinking water. No additional improvements or alterations to the existing water system will be required for the expansion.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

3.2.13. AESTHETICS

a) Would the project affect a scenic vista or scenic highway?

There are no scenic views that will be obstructed by the project. The EHTS is located in a remote location and is not easily visible from I-10 because of topography (Edom Hill).

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

b) Would the project have a demonstrable negative aesthetic effect?

The project is compatible with surrounding land uses, which include the closed Edom Hill Landfill and adjacent DSI Compost facility. The unloading and transferring of waste inside the building and design features, which include building orientation, fencing, and topography, will obscure MSW transfer operations. The outside Organics/C&D Processing/Storage Area is screened from view by topography, fencing, the closed landfill, and transfer building.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

c) Would the project create night lighting or glare?

The facility typically operates only during daylight hours except during the shorter days of winter. Outside lighting provides for basic safety and security during nighttime hours and has been installed to avoid glare to adjacent properties or into the night sky. The Mount Palomar Observatory, located in the San Diego County, requires darkness so that the night sky can be viewed clearly. The presence of the observatory necessitates unique nighttime lighting standards in several areas of Riverside County. Specific light pollution standards and policies issued by the General Plan apply to several areas within Riverside County. The proposed project is located within Zone B of the Mt. Palomar Nighttime Lighting Policy Area Map of the General Plan, however, because the operation at the EHTS will occur mostly during daylight hours, and outside lighting is shielded downward to reduce glare to adjacent properties or into the night sky, the project will not obstruct or hinder the view. Therefore, the expanded operation will not result in impacts associated with night lighting or glare.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

prehistoric Native American or other historic association, and not of legal jurisdiction of the Coroner's Office, the Native American Heritage Commission (NAHC) and the designated local tribal representative(s), and any other appropriate representative(s) shall be contacted for consultation on the culturally appropriate treatment/mitigation for the remains. The agreed upon treatment shall be implemented within a reasonable time period, allowing for any negotiated analysis to occur.

FINDING: ***Less Than Significant Impact After Mitigation***

c) Would the project affect historical resources?

According to the Historical Resources map of the General Plan, the site does not contain historical resources. The cultural resource survey and archival search conducted by RECON in 1995 found no evidence of historical resources on the site. The 15-acre site located within the City of Cathedral is highly disturbed, consisting of a sedimentation basin, organics tipping pad, and storage areas for C&D waste, as well as roll-off bins. The proposed project should not require significant grading activities. Therefore, proposed project will not affect historical resources on the site.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

d) Would the project have the potential to cause a physical change, which would affect unique cultural values?

The project will not create impacts to unique cultural values.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

e) Would the project restrict existing religious or sacred uses within the potential impact area?

The project will not have any impact on these types of resources.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

3.2.15. RECREATION

a) Would the project increase the demand for neighborhood or regional parks or other recreational facilities?

The proposed project is designed to accommodate future demand for waste and recycling services resulting from new development throughout the west half of the Coachella Valley. It will not have a growth inducing effect. Therefore, it will not increase the demand for neighborhood or regional parks or other recreational facilities.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

Therefore, any GHG emissions as a result of composting are biogenic in nature. Notwithstanding the biogenic nature of the GHG emissions from the Project's greenwaste composting operation, this EA quantifies emissions and focuses on best management practices (BMP) for the composting operation as the Project's standard operating procedures for minimizing GHG emissions and the associated climate change effects.

Second, standard GHG emission rates (i.e., lbs/hour or lbs/day) from composting in open windrows are difficult to quantify due to varying accompanying parameters (i.e., windrow dimensions, particle size consistency of the greenwaste feedstock, carbon-nitrogen ratio, bulking agent proportions, moisture content, ambient temperature, etc.). In fact, some of these parameters could vary from windrow to windrow. Therefore, emission factors that are calculated as the mass ratio of gas emitted to initial fresh matter mass (FM), that is, pound/ton FM or kilogram/metric ton FM, are used to estimate GHG emissions from greenwaste composting in open windrows. This EA uses a GHG emission factor derived from the data generated by the aforementioned European field testing study.

GHG emissions are typically quantified on an annual basis and expressed in million metric tons (MMT) of carbon dioxide equivalent (CO2-EQ), which accounts for the combined global warming potential of the various GHG specimens emitted. The most common GHG specimens associated with greenwaste composting in open windrow are CO2, CH4, and N2O. To calculate the Project's aggregate composting GHG emissions on an annual basis, the maximum yearly throughput amounts of the greenwaste feedstock for production of soil amendment (21-day cycle) and finished compost (90-day cycle) are first estimated and then input as the initial fresh matter quantities for the emission calculations. As shown in the Appendix, Table A-2, production of soil amendment (21-day cycle) and finished compost (90-day cycle) are estimated to occur at 75 tpd and 125 tpd[11], respectively.

An emission factor of 40 kg CO2-EQ/MT treated materials is used in this EA for the calculation of the Project's aggregate composting GHG emissions. This emission factor is derived from a range value of 20-65 kg CO2-EQ/MT treated materials estimated in the study by Florian Amlinger, et al. in Europe for the entire composting process for biowaste or greenwaste.[12] As the European researchers explain in their paper published about the study, this emission factor range represents a properly managed composting system. Values in excess of this range probably indicate some kind of system mismanagement, such as low C/N ratio, excessive moisture, etc. Values below this range are hardly achievable and would suggest incorrect measurements or calculations or atypical conditions being the cause. A mid value of 40 kg CO2-EQ/MT treated materials is used for the calculations here to represent an average or somewhat standard windrow composting conditions.

The calculations in Appendix Table A-3 show that the Project would generate approximately 0.002643 MMT of CO2-EQ a year from greenwaste composting. This is the biogenic portion of the Project's total GHG emissions. It should be noted that this emission level is likely an over-estimation, because the portion of the Project's greenwaste for production of soil amendments undergoes a partial composting cycle of 21 and 45 days instead of a full composting cycle, on

[11] For the purpose of estimating GHG emissions, the 75 tpd of soil amendment undergoing a 45-day production cycle has been analyzed at the 90-day cycle.

[12] The cited European field testing study considers CH_4 and N_2O and excludes CO_2 in the estimation of GHG emissions from composting, treating the CO_2 emission as non-GHG or biogenic in nature. As a result, the study's calculated emission factor is based only on the total emissions of CH_4 and N_2O from the entire composting process (i.e., kg CO_2-EQ/MT greenwaste = kg CH_4/MT greenwaste x 21 + kg N_2O/MT greenwaste x 310).

Although CEQA does not require a lead agency to establish significance thresholds for GHG, the absence of an adopted threshold does not relieve the agency from the obligation to address project GHG emissions and determine impact significance. Existing CEQA Guidelines § 15064(b) states: "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved. This judgment must, however, be based on scientific information and other factual data to the extent possible." Moreover, in the recent proposed amendments to the CEQA Guidelines by the Governor's Office of Planning & Research (OPR) and California Resources Agency, pursuant to SB 97 of 2007, Section 15064.4(b)(1) is added, which states that when assessing the significance of impacts from GHG emissions on the environment, a lead agency may consider the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting. In this light, the Riverside County Waste Management Department as the lead agency has determined that the Project will not have a significant direct effect on global warming/climate change on the basis of the following facts and considerations:

1. The Project's anthropogenic GHG emissions amount to a very insignificant 0.001% of the State-wide net GHG emissions in 2004[14].

2. Although the production end of the proposed composting operation will generate anthropogenic GHG emissions, the application end of the operation, that is, land application of the Project's soil amendments and finished compost, will result in reductions in GHG emissions by means of reduction in usage of chemical fertilizers and pesticides, and the amount of irrigation water, all of which have a very high GHG-embodied energy content, as well as through carbon sequestration in the soil. If these factors are taken into consideration, the proposed composting operation may not have a negative effect on climate change, or, perhaps, it may produce a net positive effect.

3. The proposed greenwaste composting operation is consistent with the AB 32 Scoping Plan's recommended action for mitigating GHG emissions from the solid waste industry sector. It also falls in line with the CIWMB's Strategic Directive SD-6.1, which sets the goal of reducing the amount of organics in the disposal waste stream by 50% by 2020. Properly managed greenwaste composting is one of the means to achieve the goals of the Scoping Plan and CIWMB.

4. Increasing recycling, both materials recovered from MSW and C&D waste, is consistent with the AB 32 Scoping Plan's recommended action for mitigating GHG emissions from the solid waste industry sector.

5. The biogenic GHG emissions from the proposed Project can be further reduced with implementation of the appropriate Best Management Practices (BMP) or Best Performance Standards (BPS).

6. The Transfer Station's main function, consolidating waste collected in the local area for transport to landfills, is much more efficient in terms of vehicular GHG emissions than having that waste delivered to its final destination in individual trips.

[14] CARB estimated California's 2004 annual emissions of CO_2EQ at 497 MMT. *CEQA & Climate Change, CAPCOA, January 2008*

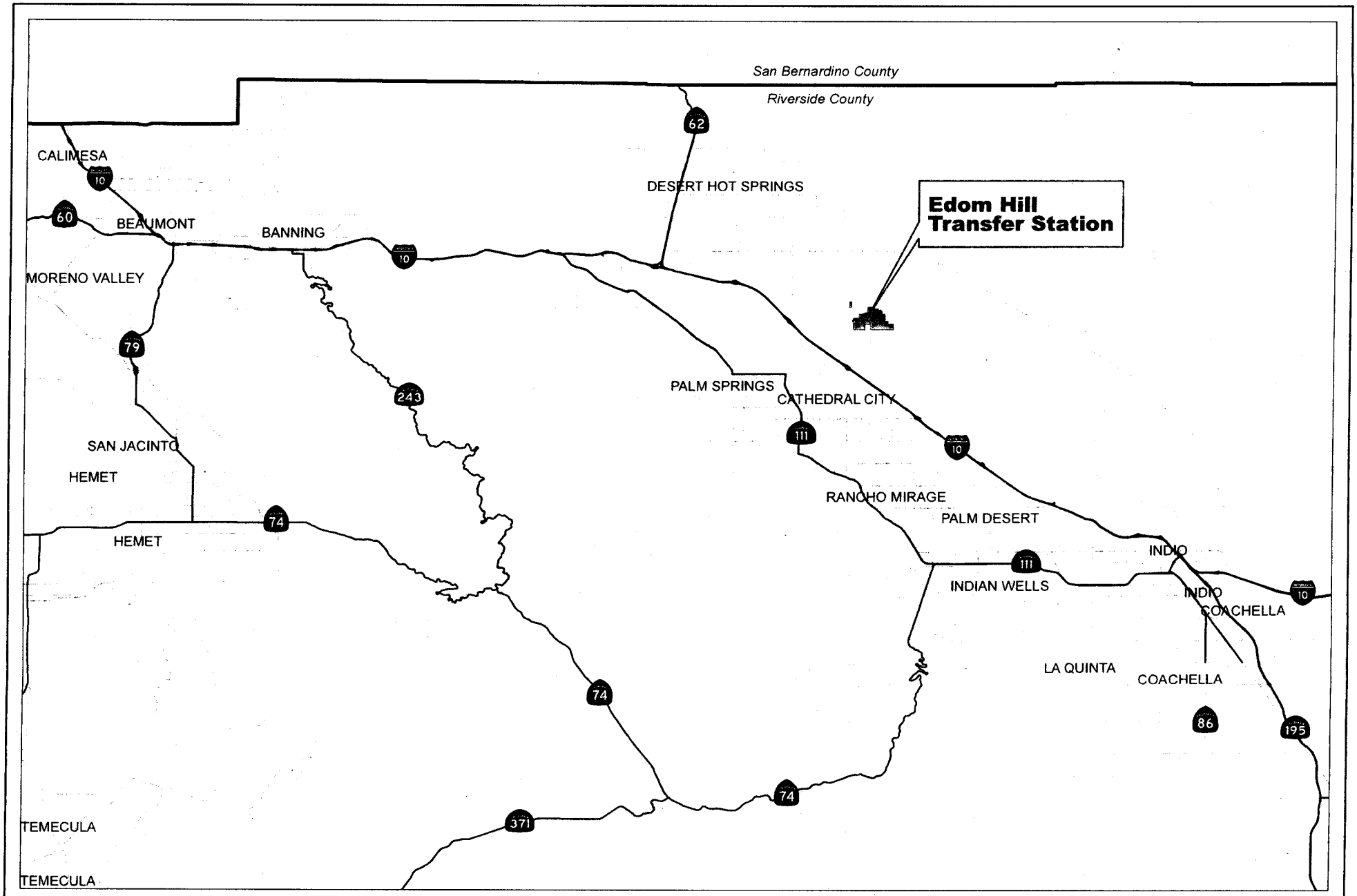
b) Would the project Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Presently, the County of Riverside has not adopted a climate action plan or greenhouse gas emission reduction plan for government operations and land use projects. As mentioned previously, the proposed greenwaste composting operation at the EHTS is consistent with the State Scoping Plan's approach to reduce GHG emissions from reducing waste and materials at the source of generation and increase use of organic materials to produce compost to benefit soils. It is also consistent with the CIWMB's Strategic Directive 6.1, which targets a 50% reduction of organic materials in the disposal waste stream by 2020.

FINDING: ***No Impact Is Identified, and No Mitigation Will Be Needed***

4. EXHIBITS

1 - Regional Location Map
2 - Vicinity Map
3 - Site Plan
4 - Organics/Greenwaste Processing Area
5 - CVMSHCP Conservation Areas



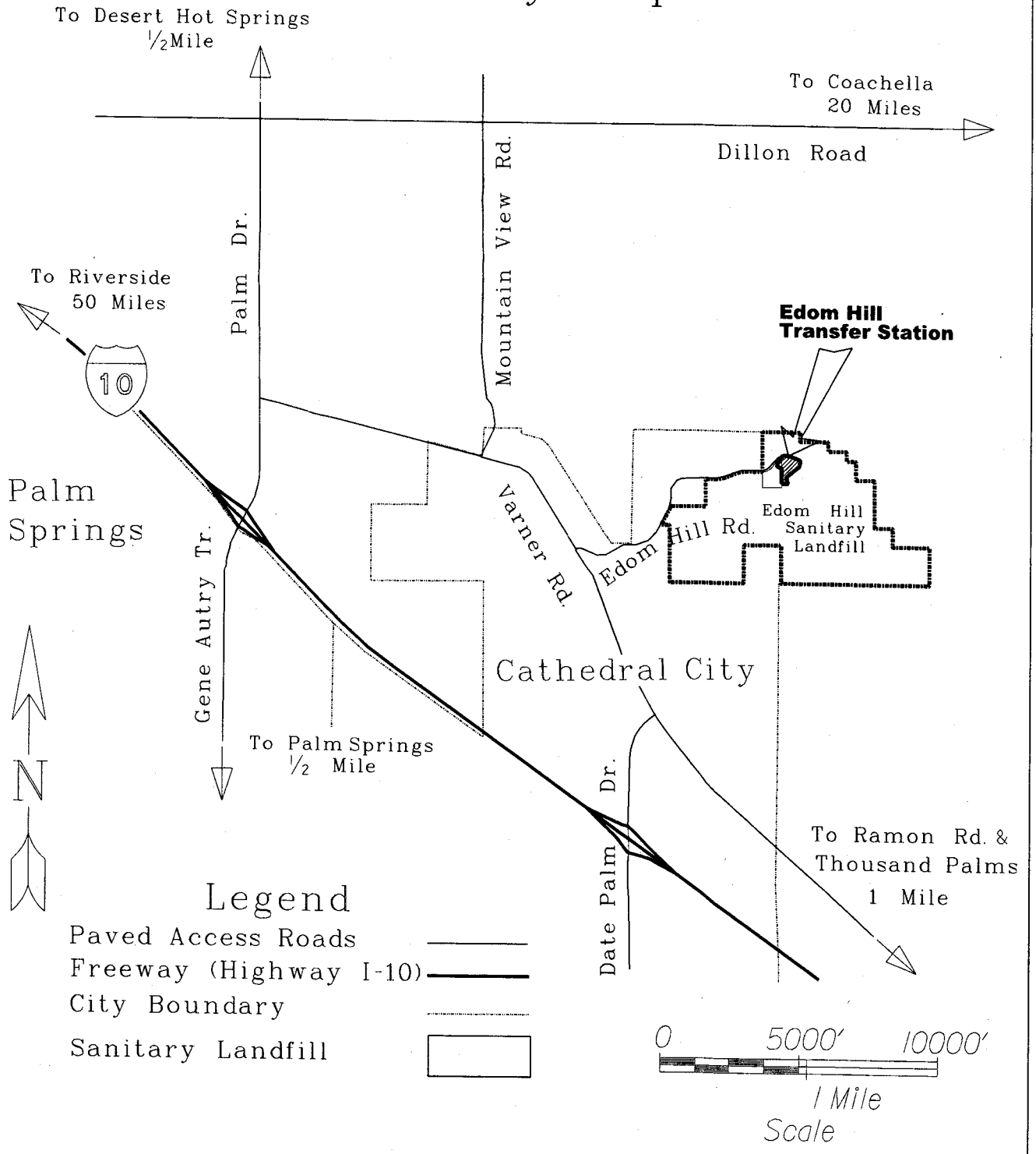
Riverside County
Waste Management Department

August 17, 2009

Regional Location Map

Exhibit 1

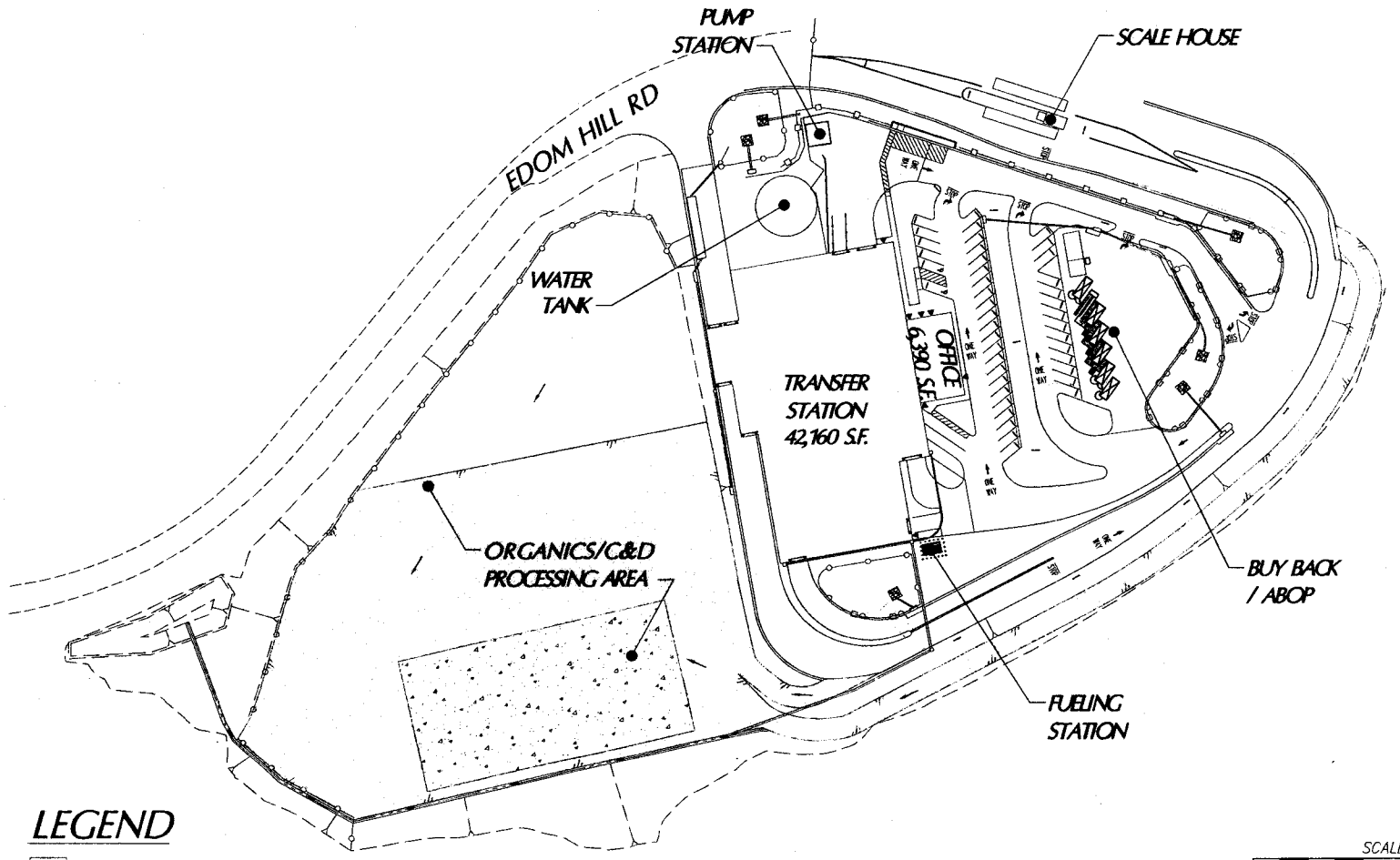
Edom Hill Transfer Station
Vicinity Map



Riverside County
Waste Management Department

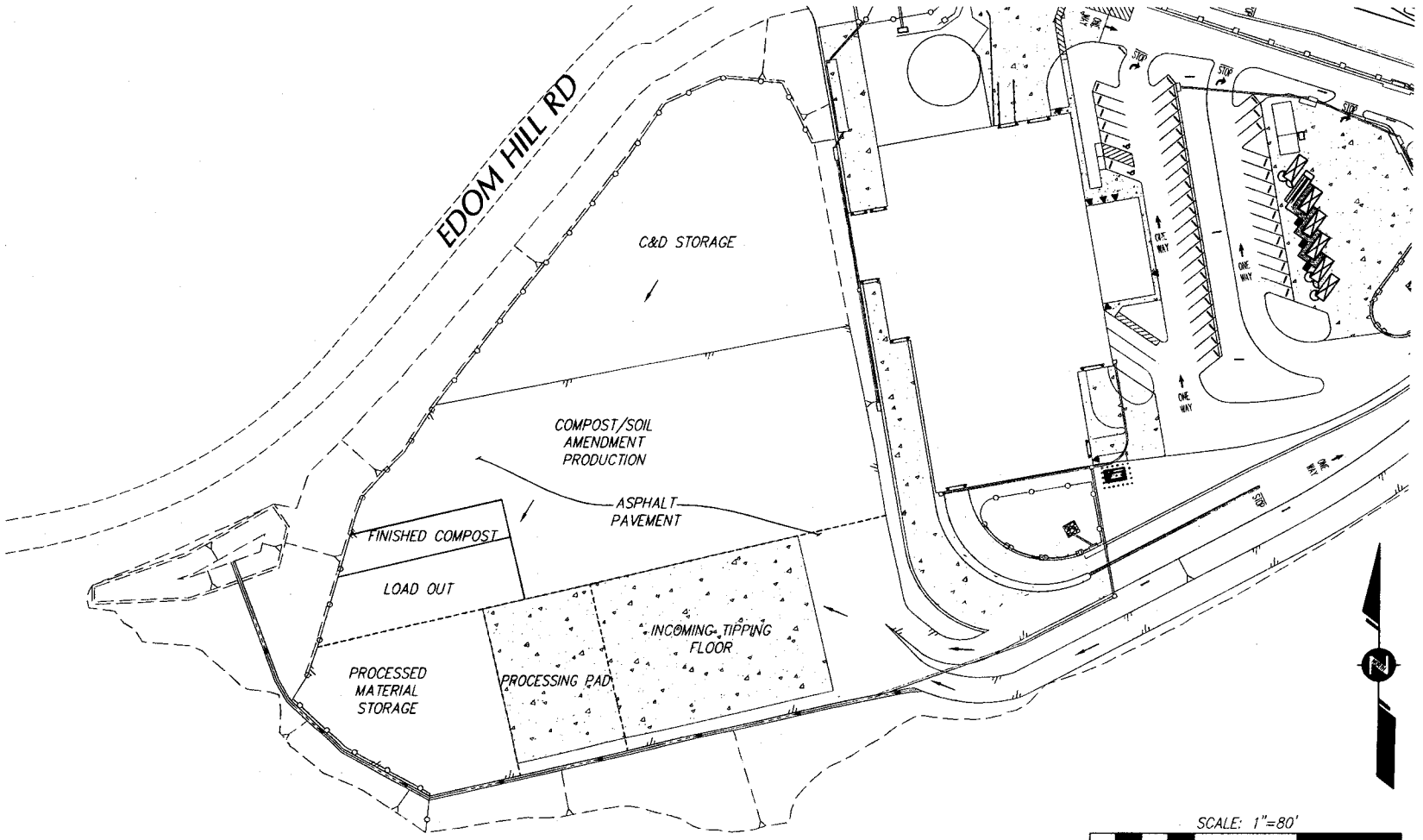
Edom Hill Transfer Station
Vicinity Map
Exhibit 2

File Directory: engr/siles/vicinity_maps/ehvicinity_ts.dgn		Date: August 17, 2009
Pen Table:	Photo Date :	Scale : 1"=5000'



PROJECT: ---		FOR: ENVIRONMENTAL ASSESSMENT EHTS - 2009-02		Exhibit 3
PREPARED BY: K&A Engineering, Inc. ENGINEERING LAND PLANNING SURVEYING 357 N. SHERIDAN STREET SUITE 117 CORONA, CALIFORNIA 92880 TEL (951) 279-1800 FAX (951) 279-4380	OPERATOR: BURRTEC WASTE INDUSTRIES, INC. 9890 CHERRY AVENUE FONTANA, CALIFORNIA 92335	SHEET: SITE PLAN		
		SCALE: AS SHOWN	DATE: JULY 2009	CHECKED BY: K.O.	DRAWN BY: D.R.	JOB #: --

Drawing: R:\180183-J Edom Hill\Exhibit\Environmental Assessment\183 - EXH - EA - 03 - SITE PLAN.dwg Layout: p 11x17 L Last Saved: Fri Jul 24, 2009 - 3:00pm Last Plotted: Fri Jul 24, 2009 - 3:01pm By: derekr



PROJECT: ---

FOR: ENVIRONMENTAL ASSESSMENT EHTS - 2009-02

Exhibit 4

SHEET: ORGANICS/GREEN WASTE PROCESSING AREA

PREPARED BY: K&A Engineering, Inc. — ENGINEERING, LAND PLANNING, SURVEYING — 357 N. SHERIDAN STREET, SUITE 117, CORONA, CALIFORNIA 92880, TEL (951) 279-1850, FAX (951) 279-4380

OPERATOR: BURRTEC WASTE INDUSTRIES, INC. 9890 CHERRY AVENUE FONTANA, CALIFORNIA 92335

SCALE: AS SHOWN	DATE: JULY 2009	CHECKED BY: K.O.	DRAWN BY: D.R.	JOB #: --

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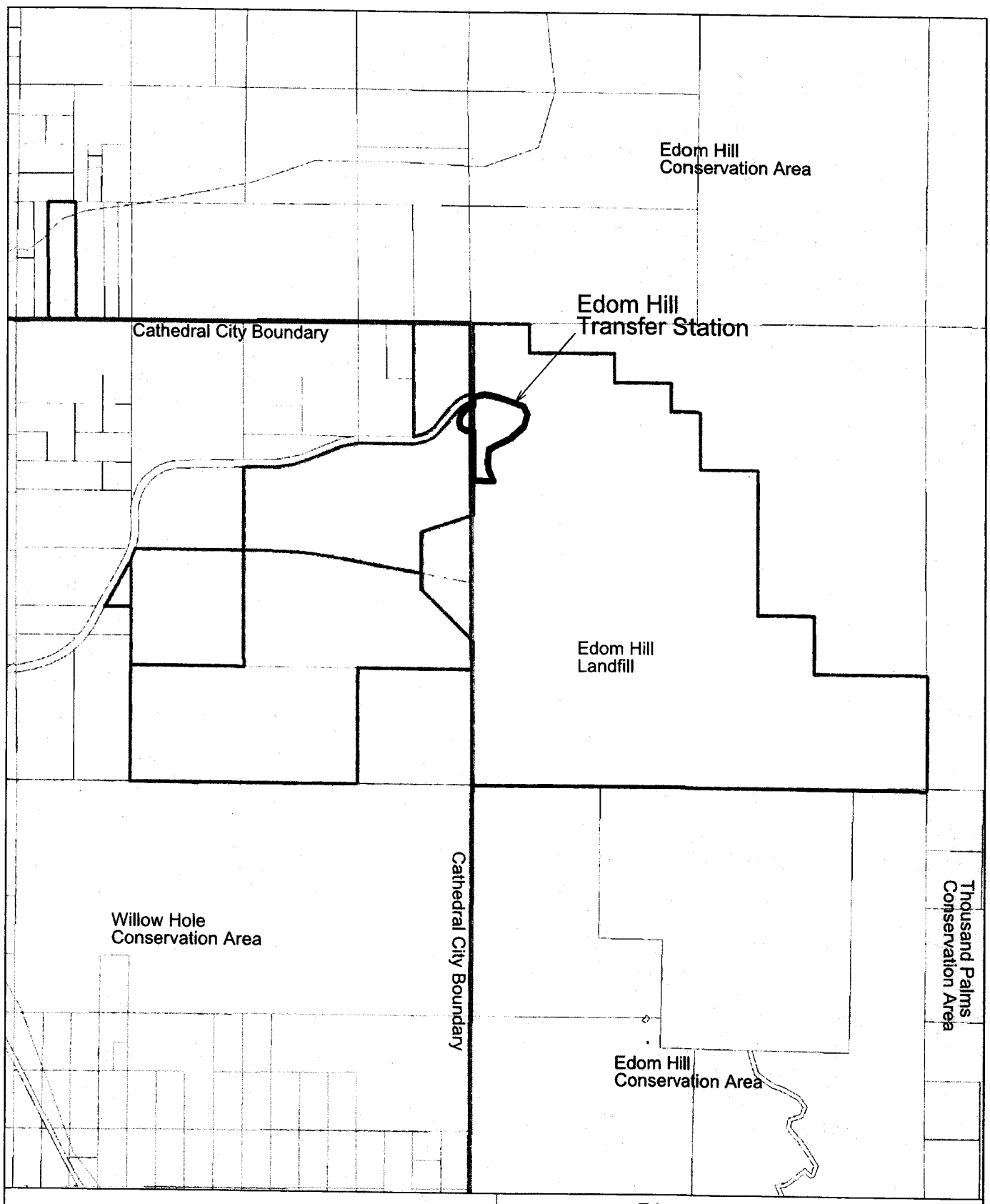

Riverside County
Waste Management Department

Edom Hill Transfer Station

CVMSHCP Conservation Areas

Exhibit 5

File Directory: engr/sites/edom/ref/edomhill_transfer_station.dgn	Date:	Sept. 29, 2009
	Photo Date : n/a	Scale : 1"=1500'

5. APPENDIX

Table A-1: On-Road Daily Vehicle Trip Generation and Vehicle Miles Traveled

Table A-2: Greenwaste Processing and Estimates of Volatile Organic Compounds (VOC) Emissions and Emission Reduction

Table A-3: Greenwaste Composting Estimates of Greenhouse Gas (GHG) Emissions

Table A-1
On-Road Daily Vehicle Trip Generation and Vehicle Miles Traveled

Waste Type / Vehicle Type	Trips			One-Way Distance		Vehicle Miles Traveled		
	Exist	Proposed	Change	Exist	Proposed	Exist	Proposed	Change
MSW								
Collection	253	296	43	15	15	7,590	8,880	1,290
Large Self	86	91	5	15	15	2,580	2,730	150
Small Self	250	275	25	15	15	7,500	8,250	750
Transfer	96	110	14	40	40	7,680	8,800	1,120
Total	**685**	**772**	**87**			**25,350**	**28,660**	**3,310**
Greenwaste								
Collection	20	49	29	15	15	600	1,470	870
Large Self	10	26	16	15	15	300	780	480
Small Self	38	100	62	15	15	1,140	3,000	1,860
Transfer	8	21	13	40	30	640	1,260	620
Total	**76**	**196**	**120**			**2,680**	**6,510**	**3,830**
C&D								
Collection	8	29	21	15	15	240	870	630
Large Self	5	16	1	15	15	150	480	330
Small Self	25	38	13	15	15	750	1,140	390
Transfer	4	13	9	30	30	240	780	540
Total	**43**	**96**	**53**			**1,380**	**3,270**	**1,890**
Recyclables								
Collection	1	5	4	15	15	30	150	120
Large Self	1	3	2	15	15	30	90	60
Small Self	0	0	0	15	15	0	0	0
Transfer	1	2	1	15	15	30	60	30
Total	**3**	**10**	**7**			**90**	**300**	**210**
Employee								
Employee	14	23	9	25	25	**700**	**1,150**	**450**
Total	**820**	**1,097**	**277**			**21,740**	**28,520**	**9,690**

Notes:

1) The EHTS serves portions of the surrounding unincorporated County areas, as well as the cities of Palm Springs, Desert Hot Springs, Rancho Mirage, Indian Wells, La Quinta, and Palm Desert. The on-road travel distance from EHTS to the centers of these cities ranged from 12 to 14.5 miles. An average one-way trip length of 15 miles was assumed for collection vehicle and self haul trips based on these distances.

2) It was assumed that 95% of the MSW transfer trucks would travel to the Lambs Canyon Landfill and the remainder would travel to the El Sobrante Landfill. This results in an average one-way trip length of approximately 40 miles.

3) Greenwaste trucks deliver chipped and ground greenwaste to the same locations as the MSW trucks for further processing. A 40-mile one-way trip length was assumed for the existing greenwaste transfer trips. With the project, the chipped and ground materials will remain on-site for composting. The compost will be shipped as a soil amendment to ranches in the lower Coachella Valley. A 30-mile one-way trip length was assumed for the compost transfer trips.

4) The recycling transfer vehicles currently travel to the Palm Desert city yard and incorporated into loads with materials collected at other facilities for processing at materials recovery facilities (MRF) outside the valley. This yard is located approximately 15 miles, by road, from EHTS. A 15-mile one-way trip length was used to calculate emissions from recycling transfer trips.

5) C&D waste is loaded onto transfer trucks for offsite processing. A 30-mile trip length was assumed for the C&D transfer trucks.

Table A-2
Greenwaste Processing and Estimates of Volatile Organic Compounds (VOC) Emissions and Emission Reduction

	% of Total	Daily Throughput (tons/day)	Process Time (Day)	% Total Composting Emissions	VOC Emission Factor (lb/ton)[4]	VOC Emissions (lbs/day)	Emissions Reduction Efficiency[5]	Mitigated VOC Emissions (lbs/day)	Cumulative Throughput Tonnage Onsite
		A	B		C	D = A x C	E	F = D x (1-E)	A x B
Mulch/ADC[1]	30%	150	4	Rule 1133.1 compliance in terms of prevention of inadvertent decomposition during chipping and grinding processing					600
Wood Chips[2]	20%	100	14						1,400
Soil Amendment[2]	10%	50	14						700
Soil Amendment[3][6]	15%	75	21	80% Thermophilic	0.694	52.1	75%	13	1,575
Soil Amendment [6]	15%	75	45	90% Mesophilic	0.781	58.6	75%	14.7	3,375
Compost	10%	50	90	100% Lifecycle	0.868	43.4	75%	10.9	4,500
Total	**100%**	**500**				**154.1**		**38.6**	**12,150**

(1) Mixed Greenwaste Feedstock

(2) Non-curbside greenwaste feedstock and construction wood

(3) Curbside and/or mixed greenwaste feedstock

(4) Emission factors adopted from CIWMB's field testing study at a greenwaste composting facility in Modesto

(5) Emissions reduction achieved with the pseudo-biofilter construct of windrows, as demonstrated in the Modesto study.

(6) As intermediate composting emits approximately 80-90% of the lifecycle emission of VOC, so is its VOC emission factor assumed (i.e., 80% of 0.868; 90% of 0.868)

Table A-3
Greenwaste Composting Estimates of Greenhouse Gas (GHG) Emissions

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	A		B	C	D = A x B x C x 10^{-9}	A x B
Operation Schedule						
Soil Amendment	75 (68.03)	21	365	40	0.000993	27,375
Composting (Static Piles)	125 (113.38)	90	365	40	0.00165	45,625
Total	**200 (181.41)**		**365**		**0.002643**	**73,000**

Ton (T); Ton Per Day (TPD); Kilogram (Kg); Megagram (Mg) = Metric Ton (MT); Million Metric Tons (MMT); CO_2 Equivalent (CO_2-equ); gram (g); horsepower (hp); 1 T = 0.907 Mg (MT); 1 MT = 2,204.6 lbs

(1) CO_2-equ emission factor is derived from a field testing study in Europe by Florian Amlinger, et al. The researchers were able to estimate a CO_2-equ emission factor of 20 – 65 kg per Mg (fresh mass) for properly managed composting of greenwaste or biowaste. A mid value of 40 kg/Mg CO_2-equ is used for this calculation