8.2.1.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

FORM APPROVED COUNTY COUNSEL
BY: LARISA R-MCKENNA DATE

Departmental Concurrence

☒ Policy ☐ Consent — Dep't Recomm.:

☒ Policy ☐ Consent — Per Exec. Ofc.:

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Tavaglione, seconded by Supervisor Stone and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes:	Buster, Tavaglione, Stone, Benoit and Ashley
Nays:	None
Absent:	None
Date:	February 9, 2010
xc:	Waste

Kecia Harper-Ihem
Clerk of the Board
By: Deputy

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

District: 4

Agenda Number: 12.1

ATTACHMENTS FILED WITH THE CLERK OF THE BOARD

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.

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:

Original Negative Declaration/Notice of Determination was ~~routed~~ to County Clerks for posting on. H/C By Waste Mgmt

2-10-10 (Date) (Initial)

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.

This is to advise that the Riverside County Board of Supervisors has approved the above-referenced project on February 9, 2010 and has made the following determinations regarding that project:

1. The project will not have a significant effect on the environment, because impacts were avoided or mitigated through mitigation measures made a condition of the approval of the project.
2. A Mitigation Monitoring Program was adopted with approval of this project.
3. A Mitigated Negative Declaration was prepared for this project, pursuant to the provisions of the California Environmental Quality Act.
4. Findings were made in accordance with Section 21081 of the California Public Resources Code.
5. A Statement of Overriding Considerations was not adopted for this project.

This is to certify that the Mitigated Negative Declaration for Environmental Assessment No. EHTS 2009-02, along with comments and responses and record of project approval, is available to the general public at:
Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553

Signature: _____ **Title:** Urban/Regional Planner IV **Date:** February 9, 2010

Verified By: _____ Sandi Schlemmer, Deputy **Title** Clerk of the Board **Date:** February 9, 2010

RIVERSIDE COUNTY BOARD SEAL:	**TO BE COMPLETED BY OPR** Date Received for Filing and Posting at OPR:

FEB 09 2010 12.1

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

SEISMICITY/SOIL/SLOPES

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.

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 S-1 thru S-3 to the RCWMD.

Monitoring: B&S, LEA, RWQCB, CDRRR, and RCWMD.

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.

Reporting: Annual report on implementation of W-1 thru W-9 to the RCWMD. Completed mitigation measures need no detail discussion but a short note on the time of completion and the results of periodic maintenance inspections, if needed. Recurrent mitigation measures would require some documentation of the on-going actions taken.

Monitoring: RWQCB, LEA, RCFD, CDRRR, and RCWMD

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.

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.

AQ-8 The greenwaste composting feedstock must be prepared and maintained to achieve a proper carbon (C) to nitrogen (N) ratio and moisture content that would minimize emissions of ammonia gas. Adjustments to the feedstock C:N ratio shall be made when there is a noticeable increase in ammonia odor from the windrows.

AQ-9 Turning of the compost windrows at an appropriate frequency to maintain aerobic composting conditions shall be performed. The frequency of aeration shall be increased in response to detection of any noticeable increase in composting odor.

AQ-10 The transfer station operator shall implement an Odor Impact Minimizing Plan (OIMP), as required by Title 14 of the California Code of Regulation for compostable materials handling, and an Alternative Odor Management Plan (AOMP), as required by Rule 410 of the South Coast Air Quality Management District (SCAQMD) for MSW handling, and comply with SCAQMD Rule 1133.1 for prevention and minimization of emissions of odorous gases from greenwaste chipping and grinding operation.

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), to include all registration, monitoring, and reporting requirements.

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 AQ-1 thru AQ-12 to the RCWMD. Reporting on operation-related mitigation measures would require proper quantification of materials handled and documentation of activities carried out.

Monitoring: RCWMD, SCAQMD, CDRRR, and LEA.

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.

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.

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 PH-1 thru PH-11 to the RCWMD. Completed mitigation measures need no detail discussion but a short note on the time of completion and the results of periodic maintenance inspections, if needed. Recurrent mitigation measures would require some documentation of the on-going actions taken.

Monitoring: RCWMD, RCFD, SCAQMD, CDRRR, and LEA.

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.

PUBLIC SERVICES

Mitigation Measures:

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

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 PS-1 thru PS-2 to the RCWMD.

Monitoring: RCWMD, RCFD, 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.

GREENHOUSE GAS EMISSIONS

Mitigation Measures:

GHG-1 Maintain a proper carbon to nitrogen (C:N) ratio in the greenwaste feedstock that minimizes NH3 and N2O emissions. To achieve this, feedstock composition shall not consist of any food waste. Grass and leafy feedstock must be mixed and homogenized with sufficient woody materials to avoid a low C:N ratio (BMP).

GHG-2 Initial humidity of the feedstock should be 65-75%, and a humidity of 50-60% should be maintained in subsequent stage (BPS).

GHG-3 Appropriate bulking agents should be added in the feedstock mix to render the necessary air-filled pore space throughout the composting process (BMP).

GHG-4 Addition of up to 10% of mature compost in the feedstock mix will ensure the early formation of humic substances and effective binding of soluble and volatile carbon and nitrogen sources (BPS).

GHG-5 The facility's vehicle fleet operation shall comply with future requirements of the California Air Resources Board's Low-Carbon Fuel Rule.

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 summary report on implementation of GHG-1 thru GHG-5 to the RCWMD. Reporting on operation-related mitigation measures would require proper quantification of materials handled and documentation of activities carried out.

Monitoring: RCWMD, SCAQMD, CDRRR, and 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

Local Agencies

Southern California Association of Governments (SCAG)
Eric H. Roth, Intergovernmental Review
818 West 7th Street, 12th Floor
Los Angeles, CA 90017-3435

Coachella Valley Association of Governments
73-710 Fred Waring Drive, Suite 200

Coachella Valley Water District
P. O. Box 1058
Coachella, CA 92236

Western Riverside Council of Governments
Kevin Viera, Program Manager
4080 Lemon Street, 3rd Floor
Riverside, CA 92501

Environmental Organizations/Other

Union for a River Greenbelt Environment (U.R.G.E.)
C/o Raymond W. Johnson
26785 Camino Seco
Temecula, CA 92590

Gary Koontz
Burrtec
9890 Cherry Avenue
Fontana, CA 92334

Center for Community and Environmental Justice
P.O. Box No. 33124
Riverside, CA 92519

Local Governments

City of Cathedral City
Planning Department
Leisa Lukes, Planning Dept
68-700 Avenida Lalo Guerrero
Cathedral City, CA 92234

City of Cathedral City
Attn: Deanna Pressgrove,
Special Projects Manager
Dept. of Environmental Conservation
68-700 Avenida Lalo Guerrero
Cathedral City, CA 92234

City of Indio
100 Civic Center Mall
Indio, CA 92201

City of Desert Hot Springs
65950 Pierson Blvd.
Desert Hot Springs, CA 92240

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

City of Palm Desert
73510 Fred Waring Drive
Palm Desert, CA 92260

City of Coachella
Planning Department
1515 Sixth Street
Coachella, CA 92236

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

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

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

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

Riverside County Government Agencies

Riverside County Agricultural Commissioner
Intra-County Mail Stop #1250

Riverside County Board of Supervisors - Bob Buster, First District Supervisor
Intra-County Mail Stop #1001

Riverside County Board of Supervisors - John Tavaglione, Second District Supervisor
Intra-County Mail Stop #1002

Riverside County Board of Supervisors – Jeff Stone, Third District Supervisor
Intra-County Mail Stop #1003

Riverside County Board of Supervisors
Attn: Denys Arcuri, Fourth District Legislative Assistant
Intra-County Mail Stop #1004

Riverside County Board of Supervisors – Marion Ashley, Fifth District Supervisor
Intra-County Mail Stop #1005

Riverside County Executive Office, Attn: Alex Gann
Intra-County Mail Stop #1020

Riverside County Department of Building and Safety
Intra-County Mail Stop #2715

Riverside County Flood Control and Water Conservation District
Intra-County Mail Stop #2990

Riverside County Department of Environmental Health - LEA,
Attn: John Watkins
Intra-County Mail Stop #1615

Riverside County Fire Department
Intra-County Mail Stop #2240

Riverside County Planning Department
Intra-County Mail Stop #1070

Riverside County Sheriff's Department
Intra-County Mail Stop #1450

Riverside County Transportation Department
Intra-County Mail Stop #1080

Riverside County Regional Parks & Open Space District
Intra-County Mail Stop #2970

Riverside County – Economic Development Agency (EDA)
Intra-County Mail Stop #1330

Riverside County Department of Facilities Management
Intra-County Mail Stop #2600

Environmental Programs Department
Intra-County Mail Stop #1084

Riverside County Transportation Commission
Intra-County Mail Stop #1031

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

Curtis Showalter
Public Works Manager
City of Corona
400 South Vicentia Avenue
Corona, CA 92882

Chris Vogt
City of Moreno Valley
14177 Frederick Street
Moreno Valley, CA 92552

Barbara Smith
City of Temecula
Community Services Department
P.O. Box 9033
Temecula, CA 92589-9033

Miguel Arciniega
22049 Mimosa Lane
Moreno Valley, CA 92553

David Fahrion
CR&R
1706 Goetz Road
Perris, CA 92570

Jimmy Tatosian
9890 Cherry Avenue
Fontana, CA 92335

Carole Bell
2215 Tenaja Road
Murrieta, CA 92562

Robert Lemon
City of Moreno Valley
Public Works Department
14177 Frederick Street
Moreno Valley, CA 92552

Don Robinson
Councilmember
City of Banning
99 East Ramsey Street
Banning, CA 92220

Richard Schmid
26100 Olson Avenue
Homeland, CA 92548

Ben Drake
P.O. Box 890009
Temecula, CA 92589

Deanna Pressgrove
City of Cathedral City
68-700 Avenida Lalo Guerrero
Cathedral City, CA 92234

Dean Wetter
City of Corona
Public Works Department
730 Corporation Yard Way
Corona, CA 92880

Jordan Ehrenkranz
Councilmember
City of Canyon Lake
31516 Railroad Canyon Rd
Canyon Lake, CA 92587

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

Randle C Moore
c/o Michael A. Nichols, Trustee
P. O. Box # 12121
Palm Desert, CA 92255
APN: 659-260-023*; 659-260-030*

Insite Towers
C/O Legal Department
301 N. Fairfax Street Suite 101
Alexandra, VA 22314
APN: 659-260-023* ; 659-260-030*

Center for Natural Lands Management, Inc.
215 W. Ash Street
Fallbrook, CA 92028
APN: 659-150-005*; 659-150-004*;

Mary Grassman
74-900 Highway 111, Suite 120
Indian Wells, CA 92210
APN: 659-150-003; 659-150-004*

Kenneth B. Jacques
c/o James A. Grassman
74900 Highway 111, Suite 120
Indian Wells, CA 92210
APN: 659-150-005*

Coachella Valley Mountains Conservancy
73710 Fred Waring Drive, Suite 205
Palm Desert, CA 92260
APN: 659-130-012

Vinh Quang Nguyen
9561 Mansor Avenue
Garden Grove, CA 92844
APN: 659-260-009

Department of Interior
Bureau of Land Management
22835 Calle San Juan De Los Lagos
Moreno Valley, CA 92553

El Yeager Construction , Inc
C/o Yeager Skanska Inc.
1995 Agua Mansa Rd
Riverside, CA 92509
APN: 659-190-005

Ignacio Gallardo
31085 San Isidro Ave
Cathedral City, CA 92234
APN: 659-130-005

Jonathan Laura
66936 Desert View
Desert Hot Springs, CA 92240
APN: 659-300-003

Keith McGrew
21400 Long Canyon Rd
Desert Hot Springs, CA 92241
APN: 659-140-005

Garland Hayes
69150 Moon Ranch Rd
Desert Hot Springs, CA 92241
APN: 659-140-007

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

COUNTY OF RIVERSIDE
WASTE MANAGEMENT
10 JAN -4 AM 11:52

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 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

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

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

This is space for County Clerk's Filing Stamp

COUNTY OF RIVERSIDE
WASTE MANAGEMENT
09 NOV 24 AM 11:27

STATE OF CALIFORNIA
County of Riverside

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of a printer of the, DESERT SUN PUBLISHING COMPANY a newspaper of general circulation, printed and published in the city of Palm Springs, County of Riverside, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Riverside, State of California under the date of March 24, 1988. Case Number 191236; that the notice, of which the annexed is a printed copy (set in type not smaller than non pariel, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

November 22nd, 2009

All in the year 2009

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

Dated at Palm Springs, California this ---23rd, ---- day of---------- November ----------, 2009

Signature

Proof of Publication of

No 5138
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 (760.329.5925); 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 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

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.

Published: 11/22/09

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

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SN:EE:CT:JK:JHL:GM

RVC091125-04
Control Number

Mr. Ryan Ross
Planner IV

December 22, 2009

Operational Air Quality Analysis – Greenwaste Composting Emissions

- The SCAQMD staff has reviewed the air quality emission calculations and estimates for the greenwaste composting emissions and has concluded that the VOC emission factor used in the analysis is too low.

The lead agency initially compared emission factors from different VOC emission research studies: (1) the SCAQMD's study at the Inland Empire Composting site in 2001 during the Rule 1133 rulemaking process that derived an average emission factor of approximately 3.84 pounds of VOC per ton of greenwaste composted; (2) the California Integrated Waste Management Board (CIWMB) field test at a facility in Modesto in 2006 indicating an average VOC emission factor of between 0.8–0.9 pounds per ton of greenwaste; (3) the NorCal facility site test resulting in an average emission factor of 8.6 pounds per ton of greenwaste; and (4) an investigative study by the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD) that re-evaluated the aforementioned study results and presented its own emission study results from an undisclosed facility indicating an average emission factor of 14.06 pounds of VOC per ton of greenwaste. The lead agency used the VOC emission factor of 0.868 pounds of VOC per ton of greenwaste from the CIWMB's Modesto study to estimate the VOC emissions from the project's full lifecycle (60–90 days) composting operation, because they seemed scientific, legitimate and directly applicable to greenwaste composting emissions analyses.

However, based on a review conducted by the SJVAPCD, the greenwaste composting VOC emissions factor used in the Modesto study was re-calculated to be an emission factor of 1.54 pounds per ton of greenwaste for the full lifecycle (i.e., 57-day cycle) emissions calculation. The SCAQMD staff believes it is more appropriate to use, at a minimum, the re-calculated VOC emission factor of 1.54 pounds per ton of greenwaste for the full lifecycle emissions calculation. Some adjustment should also be made to VOC emission factors to reflect the shorter production cycles (i.e., 21-day and 45-day) for soil amendments, since shorter production cycles result in emissions approximately 80 to 90 percent of the full lifecycle valves.

SCAQMD staff therefore recommends the following emission factors be used to estimate project VOC emissions in the Final MND: 1) 1.54 pounds per ton of greenwaste for a 100 percent lifecycle composting period; 2) 1.232 pounds per ton of greenwaste (i.e., 80% of 1.54) for a 21-day soil amendment cycle; and 3) 1.386 pounds per ton of greenwaste (i.e., 90% of 1.54) for a 45-day soil amendment cycle.

The SCAQMD staff recommends that the lead agency revise the emission estimates in the Final MND using these recommended emission factors and compare the revised estimates with the SCAQMD recommended daily operated significant threshold for VOC of 55 pounds per day. If significant, the lead agency should then investigate feasible mitigation measures to reduce the VOC impacts to a level of less than significant. An additional mitigation measure that the SCAQMD staff recommends is for the emissions

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:

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- EnviroStor, a database primarily used by the California Department of Toxic Substances Control, at www. Envirostor.dtsc.ca.gov.
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

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 to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.

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

www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

If you have any questions regarding this letter, please contact me at (714) 484-5472 or at "ashami@DTSC.ca.gov".

Sincerely,

Al-Shami
Project Manager
Brownfields and Environmental Restoration Program - Cypress

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814
nritter@dtsc.ca.gov

CEQA #2731

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

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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

to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.

Response

The project site does not contain contaminated areas; therefore, no investigation and/or remediation would be required. The EHTS implements a Hazardous Waste Screening and Exclusion Program that details onsite procedures in the event that hazardous or infectious waste is discovered in the recyclables or solid waste tipping areas.

Comment #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.

Response

The proposed project does not involve construction that would include soil excavation or soil filling. Therefore, no sampling is required.

Comment #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.

Response

The proposed project does not involve construction or demolition activities. 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 of sensitive receptors.

Comment #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.

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.

RESPONSES TO COMMENTS/QUESTIONS FROM SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD)

Comment #1

The SCAQMD staff has reviewed the air quality emission calculations and estimates for the greenwaste composting emissions and has concluded that the VOC emission factor used in the analysis is too low.

The lead agency initially compared emission factors from different VOC emission research studies: (1) the SCAQMD's study at the Inland Empire Composting site in 2001 during the Rule 1133 rulemaking process that derived an average emission factor of approximately 3.84 pounds of VOC per ton of greenwaste composted; (2) the California Integrated Waste Management Board (CIWMB) field test at a facility in Modesto in 2006 indicating an average VOC emission factor of between 0.8–0.9 pounds per ton of greenwaste; (3) the NorCal facility site test resulting in an average emission factor of 8.6 pounds per ton of greenwaste; and (4) an investigative study by the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD) that re-evaluated the aforementioned study results and presented its own emission study results from an undisclosed facility indicating an average emission factor of 14.06 pounds of VOC per ton of greenwaste. The lead agency used the VOC emission factor of 0.868 pounds of VOC per ton of greenwaste from the CIWMB's Modesto study to estimate the VOC emissions from the project's full lifecycle (60–90 days) composting operation, because they seemed scientific, legitimate and directly applicable to greenwaste composting emissions analyses.

However, based on a review conducted by the SJVAPCD, the greenwaste composting VOC emissions factor used in the Modesto study was re-calculated to be an emission factor of 1.54 pounds per ton of greenwaste for the full lifecycle (i.e., 57-day cycle) emissions calculation. The SCAQMD staff believes it is more appropriate to use, at a minimum, the re-calculated VOC emission factor of 1.54 pounds per ton of greenwaste for the full lifecycle emissions calculation. Some adjustment should also be made to VOC emission factors to reflect the shorter production cycles (i.e., 21-day and 45-day) for soil amendments, since shorter production cycles result in emissions approximately 80 to 90 percent of the full lifecycle valves.

Response

As discussed on page 38 of EA No. EHTS 2009-02, consideration was given to all four studies quoted in your comment for the estimation of VOC emissions from the proposed greenwaste composting operation. The emission factors derived from the 2001 SCAQMD study were rejected for a combination of reasons: i) composite sampling methodology employed is controversial; ii) small sample size, iii) no accounting for temporal variability in VOC emissions of the composting process, since all samples were conducted in a single day; and iv) emission samples being skewed by anaerobic emissions from the predominant static piles of wood chips at the facility.

As mentioned in the EA, the investigative study by the SJVAPCD on the results of the Modesto Study was responded to and rebutted by the CIWMB in a letter dated August 1, 2008 (see attached letter). According to Robert Horowitz, composting emissions expert of the CIWMB and author of the said response letter, the SJVAPCD ultimately accepted the responses and decided that the Modesto Study numbers should not be altered. In response, the SJVAPCD commenced an emissions study of its own, the results of which should be available soon. In other words, the SJVAPCD no longer stands by the

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.

At this time, the SCAQMD has not established any rule standards for analyzing VOC emissions from greenwaste composting for projects within the South Coast Air Basin through a scientific evaluation and public review process. Therefore, the VOC analysis prepared for the Project used the best available emissions data. Per §15204(a) of the CEQA Guidelines, *CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.* As discussed in the EA and reiterated in this response, the choice of using the emissions factors from the Modesto Study was based primarily on the technical and scientific merits of the study relative to the other studies. The emissions factors data pool as a whole is too variable to pick one emission factor for use based on principles or considerations other than the statistical integrity of the empirical data from which the emission factor was derived. It is clear that the Modesto Study data has the highest statistical integrity compared to those of the other field studies as well as the investigative study by the SJVAPCD. The VOC emissions analysis in the EA has presented a conclusion that is supported by a fair argument based on substantial evidence, and thus it is consistent with § 15384 (a) of the CEQA Guidelines, which states that *"substantial evidence" means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.* Therefore, we believe that the EA has presented a *sufficient degree of analysis* of the VOC emissions and associated potential impacts of the project that *would enable the decision makers to make a decision which intelligently takes account of environmental consequences*, in conformance with § 15151 of the CEQA Guidelines.

Comment #2

SCAQMD staff therefore recommends the following emission factors be used to estimate project VOC emissions in the Final MND: 1) 1.54 pounds per ton of greenwaste for a 100 percent lifecycle composting period; 2) 1.232 pounds per ton of greenwaste (i.e., 80% of 1.54) for a 21-day soil amendment cycle; and 3) 1.386 pounds per ton of greenwaste (i.e., 90% of 1.54) for a 45-day soil amendment cycle.

The SCAQMD staff recommends that the lead agency revise the emission estimates in the Final MND using these recommended emission factors and compare the revised estimates with the SCAQMD recommended daily operated significant threshold for VOC of 55 pounds per day. If significant, the lead agency should then investigate feasible mitigation measures to reduce the VOC impacts to a level of less than significant.

Response

The 1.54 pounds/ton emission factor was a recalculated value in the investigative study by the SJVAPCD, which was rejected for the reasons explained in the response to Comment #1. The VOC analysis prepared for the Project used the most scientific and legitimate VOC emission factors available.

Comment 3

An additional mitigation measure that the SCAQMD staff recommends is for the emissions from the composting operations be controlled by a covered and aerated collection system that is vented to a device, such as a biofilter.

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

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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

7 show emissions more in line with the other studies. The district and Dr. Schmidt should review the Day 3 NorCal sampling event to determine whether there are other confounding circumstances, such as high winds.

Page 6: Is Figure 2.1 based on actual measured data or is it figurative?

Page 7: Figure 2.2 appears to be identical to Figure ES 2 on page 4.

Page 8: Section 4.1: We question whether there is enough data to support the contention that smaller windrows increase emissions. It seems more reasonable that emissions will correlate with the amount of materials in the windrow, as well as operational factors such as C:N or moisture. In fact, that is the rationale for having an emissions factor. Assuming that similar materials have similar potential emissions, a smaller windrow could very well give off its latent potential emissions more rapidly, because of its relatively high surface area and greater penetration of oxygen to the pile core. However, these emissions should trail off more rapidly as the smaller amount of material matures, and overall emissions factors should be more or less the same, and might even track below the average because of good aeration. We do not discount this theory entirely, because a smaller windrow may have a smaller "biofilter effect," where gases are destroyed while filtering up through the pile. If proven to be true, this phenomena could possibly be mitigated by the application of a biofilter compost cap.

Page 10: Section 5.1: Based on this description, we believe we can identify this site with reasonable certainty. If this is the case, the site takes overflow greenwaste from San Francisco and the East Bay. Some of these programs, particularly San Francisco's "Fabulous 3" program, encourage residents to commingle food waste with their greenwaste. There is no reasonable way to separate this foodwaste from the greenwaste; therefore, it is possible that the Site X data is more representative of foodwaste composting than greenwaste composting.

Page 10; Section 5.2: "The data set consisted of 36 measurements." Comment: The Modesto data set consists of 100 flux chamber samples and 9 quality control samples (field media blank). See page 6 of the Modesto study. Other comments about the Modesto recalculation will correspond with that section of the report.

Page 13, near bottom: "There is really no baseline/no control data for food waste." Comment: The Modesto study includes an emissions profile for an uncontrolled windrow of 85% greenwaste and 15% food waste from a local cannery.

Appendix B:

Page 2 of 7: We question why the density of the piles was recalculated, as these were not calculated figures in the Modesto report. Feedstocks for all four piles were weighed, and actual density measurements were made, as well. The CIWMB original density estimate works out to about 605 lbs/cubic yard. This is well within the range for compost feedstocks. Composters routinely use a simple conversion factor of 500 lbs per cubic yard of incoming mixed organic materials.

The recalculated density works out to 857 lbs/cubic yard, closer to what one might expect for finished compost. Please see a list of conversion factors for organic materials located at http://www.ciwmb.ca.gov/LgLibrary/DSG/IOrganic.htm . Based on this list, the statement that "The CIWMB number is significantly lower than any density values for greenwaste compost seen by this author" is either unfounded or taken out of context, because the recalculated density resembles that of finished product, not feedstock.

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

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INTEGRATED WASTE MANAGEMENT BOARD

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

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

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).

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

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

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

TABLE OF CONTENTS

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.

- EA No. 39216, SCH No. 20006081125, for the Closure/Post-Closure Maintenance of the Edom Hill Landfill, that addressed the final closure and post-closure of the Edom Hill Landfill, for which a Mitigated Negative Declaration was adopted by the BOS on October 3, 2006.

- Notice of Exemption (NOE) 2007-03, dated September 18, 2007, for the EHTS Master Lease Agreement and Amendment No.3 to the Disposal of Solid Waste Agreement, which allowed greenwaste grinding and processing, and enlarged the lease area to 21.9 acres.

- Edom Hill Transfer Station City Mitigation Agreement between the County of Riverside and the City of Cathedral City, dated November 5, 2002, and amended April 21, 2009.

- Traffic Impact Analysis for EHTS SWFP Revision Project, dated September 29, 2009, Kunzman Associates.

- Air Quality Assessment for EHTS SWFP Revision Project, dated October 29, 2009, Mestre Greve Associates.

- Greenhouse Gas Assessment for EHTS SWFP Revision Project, dated October 29, 2009, Mestre Greve Associates.

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.

4. The project site is owned by the Riverside County Waste Management Department. The facility is operated by Burrtec Recovery & Transfer, LLC.

5. The EHTS receives municipal solid waste ("MSW"), including bulky waste, universal waste, and electronic waste, source-separated recyclables, green and woody waste, and construction/demolition wastes generated from areas previously serviced by the Edom Hill Landfill. Other areas of the east Coachella Valley are serviced by the Coachella Valley Transfer Station, located on the property of the closed Coachella Landfill, off Dillon Road near the City of Coachella in unincorporated Riverside County. Areas serviced by the Edom Hill Transfer Station include the Cities of Desert Hot Springs, Palm Springs, Rancho Mirage, Cathedral City, and Indian Wells, parts of the Cities of Palm Desert and La Quinta, and the surrounding unincorporated County areas. MSW and other materials are transported to the site in commercial collection trucks (approximately 8-ton capacity) and self-haul vehicles.

6. Municipal solid wastes received at the facility are predominantly transferred to the Lamb Canyon Landfill, but may also be transferred to the Badlands Landfill or the El Sobrante Landfill.

7. The existing facility is a transfer station and recycling facility that includes the following related components (refer to Exhibit 3, Site Plan):

    - Municipal Solid Waste Transfer Station
    - Buy-back/Drop-off Recycling Center
    - Organics and Soil Amendment Processing Area
    - Construction/Demolition Waste Storage Area
    - Household Hazardous Waste Drop-off
    - Hazardous Waste Storage Area
    - Other Storage Areas
    - Other Support Facilities including truck scales, scalehouse and parking areas

8. A Local Enforcement Agency Notification has been issued for a 200 ton per day greenwaste processing "chip and grind" facility on approximately three acres located immediately west of the transfer station.

2.4. PROPOSED PROJECT

1. The proposed project will revise both the Transfer Processing Report (TPR) and the Solid Waste Facility Permit (SWFP) to introduce the following administrative and operational changes:

    - Increase permitted maximum daily tonnages from 2,600 tons per day to 3,500 tons per day.

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

for the storage of processed soil amendments with the remaining 32,000 square feet used for the staging of C&D waste.

2. The organics processing facility has a design capacity of approximately 10,876 tons of floor storage. This includes the following:

Organics Design Capacity/Floor Storage					
Area	Total CY/Pile	Lbs/CY	Total Tons/Pile	# Piles	Total Tons
Incoming GW Tipping Pad	6,481	750	2,431	1	2,431
Unprocessed Material Storage	5,296	750	1,986	1	1,986
Soil Amendment Production 1	1,185	800	474	6	2,844
Soil Amendment Production 2	2,074	800	830	2	1,659
Finished Material Storage	1,185	1,100	652	3	1,956
Total Storage					10,876

The C&D storage area is capable of staging up to 5,689 tons (9,481 cubic yards at 1,200 lbs/cy) of material.

3. Organic materials delivered to the facility include, but are not limited to:

   - Greenwaste from residential recycling programs
   - Greenwaste from commercial landscapers
   - Greenwaste from the general public (self-haul customers)
   - Untreated wood waste from general contractors
   - Untreated wood waste from the general public (self-haul customers)

4. C&D materials delivered to the facility include, but are not limited to:

   - C&D wastes from contractors
   - C&D wastes from commercial customers (roll-off boxes)
   - C&D wastes from self-haul customers

5. Vehicles delivering organics or C&D materials to the facility are checked in and weighed at the scalehouse at the transfer station's main entrance. Materials are delivered to the facility and dumped on the paved tipping pad. Facility traffic control personnel direct all dumping activities. Once emptied, vehicles exit the site through the main entrance.

6. All loads received at the facility are inspected for hazardous and other unacceptable materials in accordance with the EHTS Hazardous Waste Screening and Exclusion Program.

7. Greenwaste from residential curbside recycling routes is placed in a trommel screen where material is sorted by size. Smaller "fines" are placed in a pile while larger materials pass

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

18. C&D wastes, up to 300 tpd, are delivered to the site and stockpiled until an adequate quantity is inventoried for offsite processing.

2.4.3. BUY-BACK/DROP-OFF CENTER

1. A buy-back/drop-off center is available to the public (self-haul customers) bringing recyclable materials to the transfer station for either cash or to donate. Bins are provided for the drop-off of recyclables, such as aluminum cans, newspaper, glass, and cardboard.

2.4.4. HAZARDOUS WASTE STORAGE

1. The public (self-haul customers) are able to drop-off certain household hazardous waste ("HHW") materials at the transfer station during weekend operating hours. Only ABOP-type HHW materials (antifreeze, batteries, oil, and paint) are accepted at this facility.

2. HHW that is collected as part of the ABOP operation or hazardous waste that is removed from the incoming waste loads through the load checking program is consolidated and stored in structurally sound, leak-proof containers and transported within required time frames (generally 90 days), in accordance with applicable laws and regulations.

3. Only employees who have been fully trained and certified to handle hazardous waste may handle it.

4. The EHTS houses specific emergency medical equipment (e.g., eyewash) for this operation.

5. The hazardous waste storage box is locked during non-operational hours.

6. The project site may periodically be used for mobile HHW collection events, where additional types of HHW, beyond the ABOP variety, may be collected.

2.4.5. OTHER STORAGE AREAS

1. Green and woody waste and construction/demolition wastes will be temporarily stored at the Organics/C&D Processing/Storage area located immediately west of the transfer building.

2. Salvaged materials (which include recyclables, such as cardboard, metals, glass, and aluminum, and include bulkier wastes, such as mattresses, concrete and asphalt, occasional tires, and large metallic items or white goods) are placed in separate bins or roll-offs before being transferred offsite to recycling facilities.

3. Bins or roll-off containers are stored in designated areas of the transfer station, both inside and outside the building.

2.4.6. OTHER SUPPORT FACILITIES

1. Other existing support facilities or features include:

   - Gate and scale house
   - Scale house computer system

- 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.

7. To promote efficiency and safety, transfer vehicles enter the project site and the load-out tunnel through an entrance before the gate and scale house.

8. MSW is unloaded onto the tipping floor, pushed to the load-out bay, and then transferred to top loading transfer trailers. Transfer trailers can be loaded on a continuous basis. All transfer trucks are cleaned of excess litter and tarped prior to exiting the loadout tunnel.

9. In order to detect unacceptable materials at the EHTS, spotters oversee all unloading activities. Any vehicle observed unloading hazardous waste or other unacceptable material is instructed to reload the waste and to deliver the waste to an appropriate facility. If the quantity of the hazardous waste found is greater than 15 gallons or 115 pounds, the customer will be required to hire a licensed hazardous material hauler to remove the hazardous waste. If a hauler is not present when unacceptable material is detected, an attempt is made to determine the identity of the generator and/or hauler to obtain cooperation in the proper management and disposal of the ineligible waste. If the generator or hauler is not identified, EHTS employees either transfer the waste to the hazardous waste storage area, or the area is blocked off until the appropriate authorities (e.g., Hazardous Material Division of Riverside County Environmental Health Department) can properly remove the hazardous material. Focused load inspections are conducted in compliance with Riverside County Ordinance 779.

10. The transfer station provides for some floor separation and sorting of easy-to-segregate and/or valuable recoverable materials. Additional material recovery equipment or systems may be added. Recyclable materials are temporarily stored in the transfer station until an adequate amount is accumulated to warrant removal. Green waste is directed to the organics tipping pad for processing. Recovered recyclable materials are transferred via transfer trucks or other enclosed containers to recycling facilities.

11. MSW is removed from the transfer station on a daily basis. Residual waste that cannot be transported to a landfill at the end of a business day will be transported the following day. Under no circumstance will residual waste remain onsite for more than 48 hours. In the event that the receiving landfill is closed for a Monday holiday, any remaining residual waste at the facility will be transferred on the next business day.

12. Green waste processing and/or transferring occurs within 48 hours of acceptance of the material. Processed organics may be blended to create soil amendments and/or compost. Soil amendments may be kept onsite for up to 90 days from receipt.

13. HHW and hazardous waste retrieved from MSW is removed by a licensed hazardous waste contractor and transported to a permitted disposal or recycling facility within required time frames, but no more than 90 days. The hazardous waste is packaged, labeled, and marked by the contractor, and transport vehicles are correctly placarded according to Department of Transportation regulations for hazardous materials. The hazardous waste is manifested according to the Department of Toxic Substances Control. The transfer station maintains copies of all manifests and other required records.

14. The transfer station facility, outdoor processing areas, and equipment are maintained in a state of good repair. An ongoing preventive maintenance program has been implemented to monitor and promptly repair or correct deteriorated or defective conditions.

15. The transfer station is operated and maintained in a manner that prevents the creation of nuisances to surrounding land uses. The site and structures are cleaned on a schedule to maintain

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))***

- Solid Waste Facility Permit ***(Concurrence by CIWMB; Issuance by Riverside County Environmental Health Department, Local Enforcement Agency (LEA))***
- Compostable Materials Handling Facility Permit ***(Concurrence by CIWMB; Issuance by LEA)***
- Registration under Rule 1133 and Rule 1133.1 ***(SCAQMD)***
- Alternative Odor Management Plan under Rule 410 ***(SCAQMD, LEA)***

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).

EA CHECKLIST

		Potentially Unavoidable Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
1.	**LAND USE AND PLANNING. Would the project:**				
a)	Conflict with the General Plan or zoning?				√
b)	Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project?				√
c)	Be incompatible with existing land use in the vicinity?				√
d)	Be affected by a city sphere of influence or is it located adjacent to a city or county boundary?			√	
e)	Affect agricultural resources or operations?				√
f)	Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?				√
2.	**POPULATION AND HOUSING. Would the project:**				
a)	Cumulatively exceed official regional or local population projections?				√
b)	Induce substantial growth in an area either directly or indirectly, that is, induce growth in an undeveloped area or extension of major infrastructure?				√
c)	Displace existing housing, especially affordable housing?				√
3.	**SEISMICITY/SOIL/SLOPES. Would the project result in or expose people to potential impacts involving:**				
a)	Seismicity: fault rupture?				√
b)	Seismicity: groundshaking and liquefaction?		√		
c)	Seiche, tsunami, or volcanic hazard?				√
d)	Slope failure, landslides, mudflows, or rockfall?			√	
e)	Water or wind erosion?				√
f)	Ground subsidence and/or surface displacement due to landfill settlement?			√	

	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
g)	Interference with rail, waterborne, or air traffic?				√
6.	AIR QUALITY. Would the project:				
a)	Violate any air quality standard or contribute to an existing or projected air quality violation?		√		
b)	Expose sensitive receptors to air pollutants?				√
c)	Alter air movement, moisture, or temperature, or cause any change in climate?				√
d)	Create objectionable odors?		√		
e)	Be inconsistent with the 2003 Air Quality Management Plan (AQMP)?				√
7.	BIOLOGICAL RESOURCES. Would the project result in impacts to:				
a)	Endangered, threatened, or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?				√
b)	Wetlands and/or other sensitive habitats (e.g., marsh, riparian, or vernal pool)?				√
c)	Wildlife dispersal or migration corridors?				√
8.	MINERAL RESOURCES. Would the project:				
a)	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?			√	
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				√
c)	Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?				√

		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 government 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 substantial alterations to the following utilities:				
a)	Power or natural gas?				√
b)	Communications systems?				√

	Potentially Unavoidable Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
c) Local or regional water treatment or distribution facilities?				√
d) Sewer or septic tanks?				√
e) Storm water drainage?				√
f) Solid waste disposal system?				√
g) Local or regional water supply systems?				√
13. AESTHETICS. Would the project:				
a) Affect a scenic vista or scenic highway?				√
b) Have a demonstrable negative aesthetic effect?				√
c) Create night lighting or glare?				√
14. CULTURAL/PALEONTOLOGICAL RESOURCES. Would the project:				
a) Disturb paleontological resources?		√		
b) Disturb archaeological resources?		√		
c) Affect historical resources?				√
d) Have the potential to cause a physical change, which would affect unique cultural values?				√
e) Restrict existing religious or sacred uses within the potential impact area?				√
15. RECREATION. Would the project:				
a) Increase the demand for neighborhood or regional parks or other recreational facilities?				√
b) Affect existing recreational opportunities?				√
16. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly?		√		
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?				√

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

quality impacts attributed to longer hauling distances, and reducing the potential for illegal dumping.

Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)

The CVMSHCP is a conservation plan that protects over 240,000 acres of open space and 27 species in the Coachella Valley area. The external boundaries of the Plan Area encompass approximately 1.2 million acres, or approximately 1,850 square miles, encompassing the Coachella Valley and the surrounding mountains up to the ridgeline. The RCWMD is a Permitee to the CVMSCHP and is subject to a Joint Project Review (JPR) process for projects within conservation areas. While the closed Edom Hill Landfill site is surrounded by the Edom Hill Conservation Area, the site itself is not located within a conservation area (refer to Exhibit 5, CVMSHCP Conservation Area). Furthermore, the EHTS is an existing facility, not adjacent to, or located within a conservation area. Therefore, the proposed project would not conflict with the goals and policies of the CVMSHCP.

Riverside County Nondisposal Facility Element ("NDFE"):

The NDFE is a component of the CIWMP, which identifies and describes solid waste facilities, other than landfills, that will be utilized by jurisdictions to assist in meeting their mandated diversion goals. The EHTS is identified and described in the Riverside County NDFE. Allowing for expanded organics processing and recycling increases the waste diversion capability and scope of this facility, and thus provides further assistance to local jurisdictions in meeting mandated diversion goals. Unless otherwise required, the Riverside County NDFE will be updated to reflect the proposed project through the Annual Report process to the CIWMB.

FINDING: ***No Impact and No mitigation required.***

c) Would the project be incompatible with existing land use in the vicinity?

Surrounding land uses are rural in nature and include the following:

North: Vacant Desert, Desert Solutions, Inc. Compost Facility

South: Closed Edom Hill Landfill, Vacant Desert

East: Closed Edom Hill Landfill

West: Wind Turbines, Vacant Desert

The North City Specific Plan (NCSP) identifies land uses within the Cathedral City limits adjacent to the EHTS. Land use adjacent to the EHTS within Cathedral City limits is identified as Edom Hill Light Industrial (EH-LI). EH-LI allows for industrial and manufacturing uses, as well as green industrial uses, such as recycling facilities and solar and wind energy facilities. The proposed project is compatible with the nature of land uses that exist in its immediate vicinity; therefore, the Project will not result in impacts with incompatible land uses.

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

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

their diversion goals as established by the State. The Project would not result in substantial growth, either directly or indirectly, nor would it result in any major physical modifications creating a need to extend major infrastructure.

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

c) Would the project displace existing housing, especially affordable housing?

There is no existing housing in the vicinity of the proposed project.

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

3.2.3. SEISMICITY/SOIL/SLOPES

a) Would the project result in or expose people to potential impacts involving seismic fault rupture?

The project site is located in a region with a long history of seismic activity. The south branch of the San Andreas Fault traverses the south-central portion of the Edom Hill Landfill, and several splay faults exist both on and off the landfill property. While an earlier fault assessment of the Edom Hill Landfill property (Engineering Geology and Subsurface Investigation, Edom Hill Sanitary Landfill, prepared by Gary S. Rasmussen & Associates, Inc., dated August 17, 1993, Project No. 3167.1) did not observe active or potentially active faults within the northern portion of the landfill site as part of the original siting of the transfer station, the Riverside County Waste Management Department contracted with Advanced Earth Sciences to evaluate the active faulting potential of the EHTS project site.

On April 22, 2002 and April 23, 2002, Advanced Earth Sciences excavated a 415-foot long trench to assess and log faulting on the project site. In a letter, dated May 3, 2002, reporting the preliminary results of the fault trenching, Grant F. Miller, EG 1397, concludes the following:

The faults and shears observed in the trench appear to be minor features associated with an earlier, pre-Holocene, period deformation and, in our opinion, are not considered to be active. In addition, the observed minor faults and shears have no topographic expression and are not associated with topographic features associated with recently active fault breaks.

The Organics/C&D Processing/Storage Area is partially paved in concrete and asphalt. No habitable structures are proposed for the facility. Since the Processing Area is located immediately west of the existing transfer building, no significant seismic impacts are anticipated. With no active faults on the project site, the project will not expose people to hazards involving seismic fault rupture.

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

b) Would the project result in or expose people to potential impacts involving ground shaking and liquefaction?

According to the Riverside County General Plan, the project site may be subject to intense ground shaking, due to its proximity to the south branch of the San Andreas Fault. The EHTS was originally designed to seismic standards based upon site-specific geotechnical studies. The

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

e) Would the project result in or expose people to potential impacts involving erosion, changes in topography or unstable soil condition from excavation, grading or fill?

The project site contains soils that are subject to high wind erosion. All operational areas of the transfer station are paved in concrete or asphalt. The Organics/C&D Processing/Storage Area is also paved in concrete and asphalt to control wind erosion.

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

f) Would the project result in or expose people to potential impacts involving ground subsidence and/or surface displacement due to landfill settlement?

According to Figure S-7 of the Riverside County General Plan, the vast majority of the Coachella Valley region is susceptible to ground subsidence; however, the project site is not located within a known land subsidence hazard area. In addition, the project site is not located on a landfill. Therefore, the potential for impacts to occur as a result of land subsidence is less than significant.

FINDING: Less Than Significant Impact

g) Would the project result in or expose people to potential impacts involving expansive soil?

According to the Soil Survey of Riverside County, California, Coachella Valley Area (1980), the project site contains soils designated as BA (Badlands), CmE (Carsitas variant, 5 to 30 percent slopes) and MaD (Myoma fine sand, 5 to 15 percent slopes). Each of these soil types has low potential for shrink-swell. Development of the proposed project will not result in impacts involving expansive soils.

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

h) Would the project result in or expose people to potential impacts involving unique geologic or physical features?

Other than the project's proximity to the San Andreas Fault (see Section 3.2.3.a), the closed Edom Hill Landfill offers the most unique physical feature in proximity to the proposed project. However, impacts from the landfill are not anticipated, because 1) the EHTS serves the same function as the former landfill in accepting MSW; 2) the landfill has incorporated design features and installed environmental protection systems to protect public health, safety, and welfare; and, 3) the landfill is monitored during the post-closure period for a minimum of 30 years.

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

3.2.4. WATER

a) Would the project result in changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?

The arid desert environment of the project area is characterized with temperatures that range from 75° Fahrenheit ("F") to 110° F in the summer and from the low 30° to 80° F in the winter. An evaporation-transpiration rate of approximately 105 inches annually greatly exceeds precipitation in the area. As a result, surface water in the vicinity and within the project site is rare and limited

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***

c) Would the project result in discharge into surface waters or other alteration of surface water quality (e.g., temperature, dissolved oxygen, or turbidity)?

Municipal solid waste is received and processed within the transfer station, while green waste and C&D wastes are accepted and processed on an open-air paved tipping pad. The Organics/C&D Processing/Storage Area is an uncovered outdoor facility that can be exposed to rainfall that could result in the discharge of contaminants such as organic fines or vehicle fluids from the site into natural drainage courses. As part of the Processing Area's construction, the site has been graded to drain to a point along its western boundary where it flows into a drainage ditch that leads to a detention basin located along the south side of Edom Hill Road. The basin is used for water quality purposes as well as detention. A drainage pipe leads from the basin to a swale along the north side of Edom Hill Road. In addition, increased truck and auto traffic generated from the increased permitted daily tonnage may result in an increase in urban pollutants (e.g., oil and grease, heavy metals, and debris) on roadways and interior driveways. If allowed to wash off the site during a storm event this could create surface stormwater pollution.

A Notice of Intent was filed with the State Water Resources Control Board, and a Construction Storm Water Pollution Prevention Plan (SWPPP) was prepared and implemented for the current facility operations. A Water Quality Management Plan (WQMP) designed to address potential surface water contamination from ongoing operations was prepared for the current operation and is required to be updated to address any future changes in the operation. The WQMP identified specific Best Management Practices (BMP) to be used in addressing potential surface water contamination in compliance with the Riverside County General Permit administered by the Riverside County Flood Control and Water Conservation District. Prior to the commencement of greenwaste composting, the operator is required to submit documentation to the Regional Water Quality Control Board and Local Enforcement Agency that describes the site design and operation methods to be used to prevent liquids generated from composting from contacting groundwater and surface waters. This may include the submittal of a Report of Waste Discharge and an updated facility WQMP.

MITIGATION MEASURES:

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 Riverside County Flood Control and Water Conservation District and 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.

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%

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

g) Would the project result in altered direction or rate of flow of groundwater?

The project will not create impacts that could result in altering the direction or rate of flow of the groundwater.

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

h) Would the project result in impacts to groundwater quality?

Groundwater at the site ranges from 250 to 1,000 feet below existing surface level. The proposed project will increase the amount of daily tonnage received; which has the potential to impact groundwater quality if waste, oil, or other urban pollutants are allowed to leach through the soil into the groundwater. Compliance with existing mitigation measures for drainage plans, erosion control, grading permits, NPDES Permit, SWPPP and WQMP implementation and monitoring, will ensure that any potential impact is less than significant.

The project also proposes the development of an active greenwaste compost facility on an existing paved pad. The proposed facility will be designed so that all active compost operations occur on the paved composting pad. In addition, the entire greenwaste composting operation area may incorporate systems designed to collect any drainage from the compost material and contain and/or treat it per the requirements of the Regional Water Quality Control Board and the California Integrated Waste Management Board.

MITIGATION MEASURE:

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.

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

i) Would the project result in substantial reduction in the amount of groundwater otherwise available for public water supplies?

Water for the proposed project is provided by a County-owned well, an onsite 100,000-gallon water tank and purchased bottled water for drinking. The proposed Project will not result in a significant increase for water demand. Increases in water demand will be limited to water required for dust control and moisture conditioning of the greenwaste composting feedstock, which is estimated to be no more than an additional 6,000 gallons/day. As identified in 3.2.4(f), the project will not result in a substantial reduction in the amount of groundwater otherwise available for public water supplies.

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

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.

Table T-2
Summary of Project Traffic in PCE's

EHTS	Max. Daily Tonnage	Peak Hour						Daily
		Morning			Evening			
		Inbound	Outbound	Total	Inbound	Outbound	Total	
Existing Project	2600	155	141	296	125	139	264	3186
Proposed Project	3500	211	188	399	167	190	357	4268
Difference	900	56	47	103	42	51	93	1082

1 PCE =Passenger Car Equivalent (factors of 1.5 for self haul, 2 for lrg self haul/commercial, and 3 for transfer trucks)

2 Morning peak hour is 9% of total (excluding employees).

3 Evening peak hour is 8% of total (excluding employees).

Methodology

The existing average daily traffic volumes were obtained from the 2009 Traffic Census Program by the Coachella Valley Association of Governments, 2008 Traffic Volumes on California State Highways by the California Department of Transportation, and factored peak hour counts taken in July 2008 and March/June 2009. This data was used to establish existing traffic volumes in the traffic study area, which was then used for Level of Service ("LOS") analyses to determine existing roadway intersection operations. The TIA study used the *2000 Highway Capacity Manual* ("HCM") analysis methodology for both signalized and unsignalized intersections to determine the peak hour operation of the study intersections. The HCM analysis methodology describes the operation of an intersection using a range of LOS from LOS A (free-flow conditions) to LOS F (severely congested conditions), based on the corresponding stopped delay per vehicle ratios (i.e., the time in seconds a vehicle has to wait to get through an intersection). The County's acceptable peak hour traffic conditions are LOS C or better, and LOS D or better for both the City of Cathedral City and City of Beaumont.

Study Area

The TIA performed a LOS analyses at the following eight (8) intersections within the project area of influence.

1) Edom Hill Road/Varner Road

2) Date Palm Drive/Varner Road

3) Date Palm Drive/Vista Chino

4) Date Palm Drive/Ramon Road

5) Date Palm Drive/Interstate 10 (I-10) EB Ramps

6) Date Palm Drive/I-10 WB Ramps

7) Date Palm Drive/Valley Center Blvd

8) Date Palm Drive/30th Avenue

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.

Table T-3
Existing Plus Ambient Growth Plus Project Plus Cumulative LOS

Intersection	Traffic Control[2]	Peak Hour LOS[1]	
		Morning	Evening
Edom Hill Road at:			
Varner Road			
-without improvements	CSS	F	F
-with improvements	TS[3]	B	A
Date Palm Drive at:			
Varner Road			
-without improvements	AWS	F	F
-with improvements	TS[4]	C	C
Valley Center Blvd[5]	TS[6]	A	A
I-10 Freeway WB Ramps			
-without improvements	TS	C	F
-with improvements	TS[7]	B	B
I-10 Freeway EB Ramps			
-without improvements	TS	F	F
-with improvements	TS[7]	B	B
Vista Chino			
-without improvements	TS	F	F
-with improvements	TS	D	D
30th Avenue	TS	C	C
Ramon Road	TS	D	D

1.Traffix, Version 7.9.0215 (2008, was used to calculate LOS.

2. CSS =Cross Street Stop; AWS=All Way Stop; TS=Traffic Signal

3. Programmed for improvement in the Edom Hill Transfer Station City Mitigation Agreement and North City Specific Plan Traffic Impact Analysis, Iteris, Inc., June 27, 2008.

4. Programmed for improvement in the Edom Hill Transfer Station City Mitigation Agreement.

5. The Riverside County Transportation Dept. required the analysis of Valley Center Boulevard. Valley Center Boulevard will be constructed as part of the North City Specific Plan.

6. Traffic volumes/lane geometry obtained from North City Specific Plan Traffic Impact Analysis ramps will be relocated and loop on-ramps will be added for both eastbound and westbound traffic.

7. The existing Date Palm Drive/I-10 Freeway interchange is programmed in the 2008/09 Transportation Improvement Program (TIP) for planned improvements to include six through lanes on the overcrossing. In addition to the widening of Date Palm Drive, the existing ramps will be relocated and loop on-ramps will be added for both eastbound and westbound traffic.

Conclusion:

Although the project will result in increased vehicle trips, the TIA concludes that the proposed project is not projected to have a traffic impact due to the existing improvements programmed in the Edom Hill Transfer Station City Mitigation Agreement, as well as improvements proposed for the Date Palm Drive/I-10 Freeway interchange, and the North City Specific Plan.

FINDING: Less Than Significant Impact

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.

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

f) Would the project result in conflicts with adopted policies supporting alternative transportation (e.g. bus turnouts, bicycle racks)?

Alternative transportation policy does not apply to solid waste facilities; therefore, it will not conflict with policies that support alternative transportation.

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

g) Would the project result in rail, waterborne, or air traffic impacts?

The project will not result in any rail, waterborne or air traffic impacts.

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

3.2.6. AIR QUALITY IMPACT ANALYSIS

Regional Climate and Air Pollution

The proposed project site is located in the Salton Sea Air Basin ("SSAB"), which is identified as the one of the hottest and driest desert regions in California. The SSAB is comprised of parts of Riverside County and all of Imperial County and is located in the far southeast corner of the state next to Mexico.

Hot, dry summers and relatively mild winters characterize the climate of the SSAB. Rainfall is scant in all seasons; average annual precipitation in the basin is in the range of two to six inches per year. Average monthly maximum temperatures in the SSAB range from 108° F in July to 57° F in January. Average monthly minimum temperatures range from about 40° F in January to about 80° F in July. These seasonal fluctuations are due to the absence of marine influences, which occurs because of the presence of the mountains to the west.

Desert regions tend to be windy. The rapid daytime heating of the lower air over the desert leads to convection activity. This exchange of lower and upper air tends to accelerate surface winds during the warm part of the day when convection is at a maximum. During winter, however, the rapid cooling in the surface layers at night retards this exchange of momentum, and the result is often a high frequency of calm winds.

The mixing depth (i.e., the height available for dispersion of airborne pollutants emitted near the surface) is limited by the occurrence of temperature inversions. A temperature inversion is a layer of air in which the temperature increases with height. When a temperature inversion occurs over the desert, the height of the inversion base lies some 6,000 to 8,000 feet above the surface. Nighttime surface inversions in the desert are common, especially during the cooler months. Mixing heights are predominantly 1,000 feet or less, resulting in slow dilution of air pollutants. These inversions are caused by nighttime radiational cooling of the land surface in contact with overlying air that cools more slowly. In summer, these inversions tend to be destroyed early in the day by the intense solar radiation and heating of the land surface, resulting in greater mixing heights and rapid dilution of pollutants. In winter, however, these radiation inversions tend to persist later into the day, limiting mixing in the lower atmosphere to heights of 200 to 2,000 feet above the surface. Nocturnal inversions play a more important role in localized air quality problems, while daytime turbulent mixing has a more positive effect.

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.

- Project could generate vehicle trips that cause a localized violation of CO standards called a "hot spot."
- Project might have the potential to create or be subjected to objectionable odors.
- Project could have hazardous materials on site and could result in an accidental release of air toxic emissions.
- Project could emit an air toxic contaminant regulated by District rules or that is on a federal or state air toxic list.
- Project could involve disposal of hazardous waste.
- Project could be occupied by sensitive receptors near a facility that emits air toxics or near CO hotspots.
- Project could emit carcinogenic air contaminants that could pose a cancer risk.

In order to analyze and assess air quality impacts from the proposed project, an Air Quality Impact Analysis (AQIA) was prepared by Mestre Greve Associates, dated October 29, 2009. The AQIA contains documentation of existing air quality conditions, potential air quality impacts generated by the project, and potential mitigation measures to reduce air quality impacts to levels of insignificance. The findings and conclusions within the AQIA were used to address the Project's potential impacts on air quality.

a) Would the project violate any air quality standard or contribute to an existing or projected air quality violation?

Air quality impacts are usually divided into short term and long term. Typically, short-term impacts are the result of construction or grading operations, while long-term impacts are associated with the built out condition of the proposed project. Due to the increased traffic trips resulting from the project, the AQIA also analyzed the likelihood that the project would create a concentration (hot spots) of Carbon Monoxide (CO) and particulates (PM10 and PM2.5) along local roadways.

Hotspot Analysis

CO modeling was performed for the 2003 AQMP to demonstrate attainment of the federal CO standards in the South Coast Air Basin (SCAB). Modeling was performed for four intersections considered the worst-case intersections in the SCAB. These intersections included; Wilshire at Veteran, Sunset at Highland, La Cienega at Century, and Long Beach at Imperial. None of the intersections in the project area have peak hour traffic volumes that exceed those at the intersections modeled in the AQMP. Furthermore, based on the modeling from the AQMP and the projected traffic volumes, all intersections in the project vicinity would not be expected to experience CO concentrations in excess of the state standards.

Roads with substantial diesel truck volumes have the potential to result in particulate hot spots. The Federal Highway Administration (FHWA) guidance considers a road with an average daily diesel truck volume of 10,000 or less does not have the potential to result in a hot-spot. None of the local roads in the project area would be expected to have close to this level of diesel truck

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

generation of Volatile Organic Compound (VOC) emissions. As greenwaste decomposes it releases VOCs, which are a component in the formation of Ozone. With the project, up to 40% of the greenwaste would remain on-site for 22 to 90 days to compost and produce soil amendment. The remaining 60% of the material would be removed within 14 days of arrival in compliance with SCAQMD Rule 1133.1 and not generate substantial VOC emissions.

The following recent research studies were considered for the emission factors employed in the analysis: (1) The SCAQMD's VOC emission research studies at the Inland Empire Composting site in 2001 during the Rule 1133 rulemaking process derived an average emission factor of approximately 3.84 pounds of VOC/ton of greenwaste composted[4]; (2) The CIWMB's field test at a facility in Modesto in 2006 derived an average VOC emission factor of between 0.8 – 0.9 pound/ton of greenwaste[5]; (3) Data from a NorCal facility site indicated an average emission factor of 8.6 pounds/tons of greenwaste; (4) An investigative study by the San Joaquin Valley Air Pollution Control District (SJVAPCD) that re-evaluated the aforementioned study results and presented its own emission study results from an undisclosed facility, or Site X, which indicated an average emission factor of 14.06 pounds/ton of greenwaste[6].

The SCAQMD data was not used due to the controversial composite sampling methodology employed and the skewed emissions from anaerobic conditions of the site's predominant static piles of wood chips. The data for the NorCal site and Site X were also not used, based on the reasoning outlined in a letter by Mr. Robert Horowitz of the CIWMB, dated August 1, 2008, that contested the SJVAPCD's investigative study results. The Modesto study results are adopted for use in this EA because they are scientific, legitimate, and directly applicable to greenwaste composting emissions analyses. This is supported by the SJVAPCD's action to accept the Modesto study data and reject its own investigative study, and because the Modesto Study has the highest sampling rate amongst the previously mentioned composting emissions studies. According to the Modesto study, the lifecycle analysis emission factor for VOC emissions is approximately 0.868 lb/ton of greenwaste composted.

Table A-2 in the Appendix presents the project's projected greenwaste processing and estimates of VOC emissions. The calculations show that the greenwaste composting operations are projected to generate up to 154 pounds per day of VOC emissions when 500 tons of greenwaste are processed daily. However, with mitigation, the project is estimated to generate up to 39 pounds per day of VOC emissions from greenwaste composting.

Impact Analysis for Ammonia Gas Emission:

Unlike VOCs, ammonia emissions are commonly associated with composting of biosolid (i.e., sludge and manure) and not greenwaste. This phenomenon is clearly illustrated in a joint field testing study by the CIWMB and SCAQMD at a greenwaste composting facility operated by Tierra Verde Industries in Orange County, where 98% of emission data was found below the detection limit for ammonia. With that finding, the study at the Tierra Verde facility concluded that for greenwaste composting operations, ammonia emissions should not be a regulatory

[4] SCAQMD, "Ammonia & Volatile Organic Compond (VOC) Emissions From A Greenwaste Composting Operation" and "Remote Sensing Tests for Ammonia and Volatile Organic Compound (VOC) Emissions From A Greenwaste Composting Facility," 2001.

[5] CIWMB, "Emissions Testing of Volatile Organic Compounds from Greenwaste Composting at the Modesto Facility in the San Joaquin Valley" May 2008

[6] SJVAPCD, "Organic Material Composting and Drying Focusing on Greenwaste Composting, Air Emissions Data Review," June 2008.

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.

Table AQ-2 shows that the increases in VOC and NOx emissions will exceed the SCAQMD regional significance thresholds. The project, without mitigation, would result in a significant air quality impact. Emissions increases from all other sources are less than the SCAQMD thresholds.

It should be noted that the emissions considered in the No Project conditions only include those collection and self haul vehicles that would utilize EHTS. Without the project, the collection and self haul vehicles that would utilize the proposed expanded capacity of EHTS would need to travel to landfills or transfer stations located at a greater distance than the EHTS. Transferring the waste to these locations through individual collection and self haul vehicles is less efficient than consolidating the waste for transport via transfer trucks. This efficiency is not reflected in the emission calculations because it would be speculative to predict the alternative locations that would be utilized if EHTS were not expanded. Also, the addition of any new or replacement waste collection vehicles to the existing fleet would comply with the clean air requirements of SCAQMD Rule 1193, which includes the use of clean or alternative fuel, such as compressed natural gas (CNG) or liquefied natural gas (LNG).

Further, the greenwaste composting will increase the density of the greenwaste received at EHTS and provide for a more efficient transfer of the materials out of EHTS. Therefore, the estimated increase in emissions presented above is a worst-case estimate and does not consider emission increases that would occur without the project.

Mitigation for VOC

The majority of the VOC increase is due to the addition of greenwaste composting to the facility. The CIWMB Modesto study previously discussed identified that by capping the outer surface of the compost pile with a layer of finished unscreened compost, VOC emissions were reduced by approximately 75%. Table A-2 in the appendix shows that this would reduce the VOC emissions from the composting operations by 116 pounds per day, to 39 pounds per day. This reduces the total increase in VOC emissions due to the project to 44 pounds per day, which is less than the SCAQMD significance threshold of 55 pounds per day (see Table AQ-3).

Mitigation for NOX

The bulk of the net increase in NOX emissions is due to the increased vehicle travel to accommodate the proposed increased volume of material to be handled at EHTS. Transfer trucks are responsible for the majority, approximately 73%, of the NOX emissions increase. A reduction in transfer truck NOX emissions of approximately 15% would reduce the net increase in NOX emissions due to the project to below the significance threshold. Trucks complying with the US EPA 2007 heavy-duty truck emission requirements produce approximately 73% lower NOX emissions per vehicle mile compared to the average truck in 2014.

The proposed project is projected to generate an additional 9,690 VMT daily. The projected net increase in NOX emissions would be reduced to less than significant if a minimum of 2,289 miles of the projected daily transfer truck VMT were completed by trucks complying with the US EPA 2007 truck emission requirements. To ensure the NOX significance threshold of 55 lbs/day is not exceeded, at least eleven (11) of the facility's transfer trucks should be in compliance with the US EPA 2007 heavy-duty truck emission requirements prior to the facility receiving 3,500 tpd. Since NOx emissions are directly related to VMT, and VMT is directly related to tonnage, acquisition of these trucks shall be phased based on tonnage received in excess of the existing/permitted

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.

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.

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

b) Would the project expose sensitive receptors to air pollutants?

The proposed EHTS is located in a very remote area of Western Coachella Valley. There are no residences or other sensitive receptors along Edom Hill Road. The California Air Resource Board (CARB) has published "Air Quality and Land Use Handbook: A Community Health Perspective" which provides guidance for siting residential uses near various sources of air toxics. Transfer Stations are not listed specifically, but the number of diesel vehicles projected to utilize the Transfer Station would make it comparable to the "Distribution Center" use included in the Handbook. The CARB guidance states that residences should be avoided within 1,000 feet of such a project. The nearest sensitive land use, residences, to the Edom Hill Transfer Station is located approximately five times this distance, approximately 4,900 feet, where we would not expect a significant impact to occur. Furthermore, as identified in the AQIA, the prevailing wind patterns in the area blow the pollutants emitted from EHTS away from these receptors. Therefore, the project will not expose sensitive receptors to unhealthful levels of air pollutants generated by the project.

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

c) Would the project alter air movement, moisture, or temperature, or cause any change in climate?

The EHTS will not alter air movement, moisture, or temperature, or cause any change in climate. Global Climate Change and GHG emissions are discussed in Section 3.2.16.

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

d) Would the project create objectionable odors?

MSW Processing

MSW is received and processed inside a transfer building and continually transferred during operations. As a result, the generation and dispersion of odors is limited. Overnight storage of unprocessed refuse or transfer loads on the transfer station site is permitted only during weekends

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.

AQ-8 The greenwaste composting feedstock must be prepared and maintained to achieve a proper carbon to nitrogen ratio and moisture content that would minimize emissions of ammonia gas. Adjustments to the feedstock C:N ratio shall be made when there is a noticeable increase in ammonia odor from the windrows.

AQ-9 Turning of the compost windrows at an appropriate frequency to maintain aerobic composting conditions shall be performed. The frequency of aeration shall be increased in response to detection of any noticeable increase in composting odor.

AQ-10 The transfer station operator shall implement an Odor Impact Minimizing Plan, as required by Title 14 of the California Code of Regulation for compostable materials handling, and Alternative Odor Management Plan, as required by Rule 410 of the South Coast Air Quality Management District (SCAQMD) for MSW handling, and comply with SCAQMD Rule 1133.1 for prevention and minimization of emissions of odorous gases from greenwaste chipping and grinding operation.

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

e) Would the project be consistent with the 2007 Air Quality Management Plan (AQMP)?

Industrial development, such as the proposed Project, does not directly relate to the AQMP in that there are no specific air quality programs or regulations governing general or industrial developments. However, SCAQMD requires that all projects be consistent with the current AQMP. To be consistent with the AQMP, a project's emissions should not increase the frequency or severity of existing air quality standard violations, or contribute to a new violation at the project.

Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land-use is the primary yardstick by which impact significance of growth is determined. For example, growth-inducing projects are subject to *Southern California Association of Governments (SCAG) Conformity Review Procedures Related to Growth Management.* If a given project implements feasible transportation control measures on a project-specific basis, and if the scope and phasing of a project are consistent with adopted forecasts as shown in the Regional Comprehensive Plan (RCP), then the regional air quality impact of project growth would not be significant, since the project is already considered in the RCP's medium and long term air quality trends.

Based upon the air quality analysis, the proposed project, with mitigation, will not result in any of the SCAQMD thresholds for the criteria pollutants being exceeded. It is considered consistent with the AQMP on the basis that the transfer station will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay timely attainment of air quality standards.

In addition, waste-related projects such as this one are typically not growth-inducing. Therefore, the proposed Project will not cause non-conformance with SCAG's Growth Management criteria. Waste hauling vehicle miles traveled (VMT) associated with a waste facility are the result of population growth that has already occurred within the facility's service area. In the case of a transfer station where waste hauling is consolidated, the overall VMT is likely smaller than it

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

significance of the deposit is "undetermined." However, the project site has been actively used for almost 40 years as a landfill and has been mostly disturbed through associated activities, including the EHTS. The site has never been mined, and no mining operations exist in the immediate surrounds of the landfill property. Therefore, the project will not cause a loss of known mineral resources.

FINDING: Less Than Significant Impact

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The project site is not located within a locally-important mineral resource recovery site.

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

c) Would the project be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?

The project will not impact any mineral resource area or existing surface mining interest.

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

d) Would the project expose people or property to hazards from proposed, existing, or abandoned quarries or mines?

There are no quarries or mines on or surrounding the project site. Therefore, the proposed project will not expose people or property to hazards associated with them.

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

3.2.9. PUBLIC HEALTH AND SAFETY

a) Would the project involve a risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation)?

While the public is able to drop off certain Household Hazardous Wastes (HHW) on weekends through an ABOP (antifreeze, batteries, oil, and paint) operation at the EHTS, hazardous waste is prohibited at the EHTS and is prohibited for disposal at a Class III MSW landfill. However, the public is often unaware that certain products, such as nail polish, cleaning products, insecticides, etc., are hazardous and pose a potential risk to public health and the environment, if improperly disposed. It is the nature of waste transfer/disposal that hazardous materials, usually the household variety, are inadvertently disposed and mixed in with trash. The EHTS also contains a small fueling facility, which can also pose a risk of accidental explosion due to combustibility.

The project site's location adjacent to a closed landfill poses a risk from the potential migration of landfill gas (methane), which can be explosive. However, the risk is significantly reduced by the landfill gas collection system and flare. The transfer building was constructed with a landfill gas barrier beneath the building. The Organics/C&D Processing/Storage Area is an open-air facility that does not require a landfill gas barrier since it is not an enclosed space. Fire can also result from hot or burning materials in the incoming waste stream, accident or equipment failure.

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

b) Would the project involve possible interference with an emergency response plan or emergency evacuation plan?

It is not anticipated that the proposed project would result in impacts to public health and safety or create environmental impacts of a catastrophic nature that interfere with emergency response or emergency evacuation. The facility operator will continue to adhere to the transfer station's emergency response, emergency evacuation, and contingency plans. In addition, to account for the Organics/C&D Processing/Storage Area, the transfer station operator will update their worker safety program to implement measures that ensure that employees are trained to minimize safety hazards and avoid accidents, reducing the potential for emergency response.

MITIGATION MEASURE:

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.

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

c) Would the project involve the creation of any health nuisances or potential health hazards, such as litter and vector problems?

The project has the potential to create nuisances, such as litter and vectors (i.e., animals, birds, rodents, flies, etc.). Litter is a primary concern, because the project is located in an area of high wind (wind speeds average 7 miles per hour 85 percent of the time and exceed 25 miles per hour 3 percent of the time). The proposed Organics/C&D Processing/Storage Area will process materials on an open-air pad that is susceptible to blowing litter during windy conditions.

However, litter and vectors can be controlled, so as not to become a health hazard, with the implementation of sound waste management practices. Litter on the project site will be largely controlled through regular housekeeping measures, covered vehicle loads, site design features (i.e., orientation of building, litter fencing and other fencing, etc.), and by unloading and transferring waste within an enclosed building. These measures, and the noise and activity of facility operations, will also serve to deter the attraction of vectors, such as animals and birds. Other vectors will be controlled through the regular removal of trash and regular housekeeping of the facility and boxes, bins, and other containers. A six-foot high litter control fence has been constructed around the Organics/C&D Processing/Storage Area. Any litter that accumulates along the fence line will be picked on a regular basis depending upon weather conditions.

MITIGATION MEASURES:

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.

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.

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

b) Would the project result in exposure of people to severe noise levels?

Noise generated by the equipment used in the daily operation of the facility may expose equipment operators and other personnel to severe noise levels. To avoid this impact, personnel subject to these potential noise levels will be provided with ear protection devices (i.e., ear plugs) to protect them from loss of hearing, in accordance with Cal-OSHA (California Occupational Safety and Health Administration) and Riverside County Occupational Health requirements. The general public delivering waste to the facility will not be adversely affected by equipment noise, because they will not be exposed for a long enough time period.

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 Health Services Agency, Occupational Health and Safety Department, 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.)

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

3.2.11. PUBLIC SERVICES

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

Fire protection services for incidences that occur on Edom Hill Road or Varner Road will be provided by the fire station located on Landau Boulevard in Cathedral City. It is located approximately four (4) miles from the project site with a response time of approximately 7 minutes (Edom Hill Landfill EIR, 1997). For fires that occur on the project site, the Riverside County fire station at Thousand Palms is the first to respond to a fire call followed by the Riverside County station at North Palm Springs (Edom Hill Landfill EIR, 1997). Both stations are approximately five (5) miles from the landfill and have a response time of about 10 minutes. Response times to the EHTS and along haul routes are considered adequate by the respective fire service staff. The facility operator will also update and maintain a fire prevention plan and other emergency response plans. A fire suppression system including a 100,000 water tank, pump system, and onsite fire hydrants were constructed as part of the original transfer station project. Fire hoses and fire extinguishers are located throughout the transfer station and Organics/C&D Processing/Storage Area, as required by the respective fire agencies (refer to Section 3.2.9, PUBLIC HEALTH AND SAFETY). With implementation of these measures, the project is not expected to significantly impact fire services.

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***

3.2.12. UTILITIES AND SERVICE SYSTEMS

a) Would the project result in a need for new systems, or substantial alterations to power or natural gas?

The proposed project uses existing electrical power service. No additional power service is required.

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

b) Would the project result in a need for new systems, or substantial alterations to communication systems?

Telephone service is currently available to the project site.

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

c) Would the project result in a need for new systems, or substantial alterations to local or regional water treatment or distribution facilities?

The proposed project will not result in a need for new, or alteration to, local or regional water treatment facilities.

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

d) Would the project result in a need for new systems, or substantial alterations to sewer or septic tanks?

Community sewer service is not available to the project site. An onsite septic system was installed as part of the original facility construction. No additional sewer service is required for the proposed project

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

e) Would the project result in a need for new systems, or substantial alterations to stormwater drainage?

The proposed project is not expected to substantially increase the volume of runoff or substantially alter stormwater drainage (refer to Section 3.2.4, WATER).

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

f) Would the project result in a need for new systems, or substantial alterations to solid waste disposal system?

The proposed project will assist in preserving landfill disposal capacity in Riverside County by removing a portion of easy-to-segregate and/or valuable recoverable materials, green and wood waste, and a portion of hazardous waste from the waste stream, reducing the amount of waste that requires disposal at a landfill. The proposed Organics/C&D Processing/Storage Area will provide for the efficient onsite processing of organics materials into mulches and soil amendments and convert C&D wastes into usable aggregate products.

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***

3.2.14. CULTURAL/PALEONTOLOGICAL RESOURCES

a) Would the project disturb paleontological resources?

The Paleontological Sensitivity map of the General Plan designates the landfill property as a High A (Ha) zone, which indicates that there is a high potential for finding paleontological resources on the site. While most of the areas that the project encompasses have already been disturbed, with no grading anticipated, the RCWMD will follow the General Plan policies intended to ensure the preservation of paleontological resources in the Riverside County.

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.

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

b) Would the project disturb archaeological resources?

The Relative Archaeological Sensitivity of Diverse Landscapes map of the General Plan does not depict the site within an area of archaeological sensitivity. A cultural resource survey and archival search for cultural resources conducted on the landfill property in 1995 by RECON did not find any artifacts on the site. It added that due to the amount of activity and disturbance in the area, cultural resources were not anticipated. The 15-acre area of the landfill property located in the City of Cathedral City was not included in the archaeological survey conducted by RECON in 1995, because at that time the 15-acre site was not a part of the landfill property. However, the 15-acre site has been greatly disturbed and currently contains a sedimentation basin, a 2.7 acre paved pad used for Organics Processing, and storage areas for roll-off bins and C&D material. The Agua Caliente Branch of the Cahuilla Indians will be informed of the project, as they have been in the past. The proposed project is not anticipated to disturb archaeological resources.

MITIGATION MEASURES:

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.

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

b) Would the project affect existing recreational opportunities?

The project will employ up to 45 employees, which will not result in a substantial need for recreational opportunities. Therefore, the proposed project will not affect existing recreational opportunities.

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

3.2.16. GREENHOUSE GAS EMISSIONS

a) Would the project generate greenhouse gas emissions, either directly or indirectly?

In order to analyze and assess GHG impacts from the proposed project, a GHG Impact Analysis Report (Report) was prepared by Mestre Greve Associates, dated October 29, 2009. The Report contains documentation of climate change legislation and standards, methodologies for analyzing the Project's vehicular and equipment GHG emissions, and potential mitigation measures to reduce GHG impacts. The findings and conclusions within the Report were used to address the Project's potential impacts on GHG emissions.

Operation of the proposed project will generate new GHG emissions from three distinct greenhouse gas sources, (1) greenwaste composting, (2) vehicles traveling to and from the site, and (3) equipment used on the site for processing materials.

At this time, a widely accepted threshold for determining the significance of GHG emissions from solid waste projects has not been established. Furthermore, composting as a solid waste treatment has not been studied sufficiently in terms of its GHG emissions characteristics and emission reduction potential. In fact, there is no systematic GHG emission field testing at any California composting facility to date. The CIWMB sponsored a systematic GHG emissions field test for composting operations this summer; however, the results of the field study will not be available until approximately the end of 2009, at the earliest.

To make environmental evaluation of GHG impacts more challenging, impact significance thresholds for GHG emissions that are applicable to transfer station operations, to include composting, have not been established by any regulatory agencies. In this light, this EA will estimate the possible GHG emissions based on emission factors derived from EMFAC2007 (on-road vehicles), URBEMISv9.2.4 (on-site equipment), and recent composting field testing research conducted in Europe. These emission estimates are the net GHG emissions of the Project.

Greenwaste Composting

First and foremost in the evaluation of climate change impacts from a project's GHG emissions, the nature of the emitted GHG must be determined. Since GHG emissions, for example, CO2 and CH4, occur naturally in the manner of the carbon cycles, these emissions are biogenic in nature and not considered the primary cause of the existing global warming and climate change trends.[10] It is the man-made, or anthropogenic, portion of the GHG emissions, which are primarily from burning of fossil fuels, that is considered the primary cause of global warming and climate change. Composting of greenwaste is the controlled bio-degradation of organic matter.

[10] The huge permafrost deposit in the Arctic region is a good example of the biogenic CH_4 emission (sequestered in this case) from natural decomposition of organic matters.

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).

which the emission factor used for the calculations is based. This is a fair argument for 2 reasons; (1) The referenced European field testing finds that greenwaste composting, as opposed to biosolid composting, shows a more even and slow degradation pattern with constant GHG emission levels over the entire test period. Extreme emission values for short periods were missing in the testing samples.[13] This means that less GHG is actually emitted from the shorter soil amendment process than the calculated level; and (2) more important, the study finds that the higher global warming potential gas of N2O is emitted during the mesophillic, or maturation, phase of the composting cycle. This means that the thermophillic reactions during the shorter cycle of soil amendment production are not expected to generate any significant emission of N2O, which is 310 times more potent than CO2 in trapping heat in the atmosphere, causing the greenhouse effect.

Vehicular Emissions

Vehicle trips for the existing condition and the proposed project were divided by vehicle type: collection truck, transfer truck, small self-haul and large self-haul; and by waste type: municipal MSW, greenwaste, recyclables, and C&D waste. In addition, the numbers of trips generated by employees were included. CO2 and CH4 emissions for all EMFAC2007 vehicle types were calculated for the Riverside portion of the SSAB using the Burden mode of EMFAC2007 for 2014. Table GHG-1 presents net vehicular emissions resulting from the Project.

Material Processing Equipment

The URBEMIS2007 program (version 9.4.2) was used to calculate the emissions from the materials processing equipment. A list of the equipment used on the project site to process materials along with the daily operational hours for each piece of equipment is shown in Table AQ-1. Table GHG-1 presents net emissions from material processing equipment as a result of the Project.

Table GHG-1
Net Increase in CO_2EQ Emissions Due to Project

CO_2EQ Emissions (MMT/Year)	2014
Greenwaste Composting	0.00264
Vehicular Emissions	0.00366
Equipment Emissions	0.00022
Total	**0.00652**

The extent to which the Project's GHG emissions might contribute to global warming/climate change and correlate with specific impacts are not known at this time, because the analytic tools and scientific data needed to evaluate such impacts are not yet available. Additionally, no applicable thresholds of significance on climate change, regional or statewide, have been established by any regulatory agencies in the State. For these reasons, a comprehensive and conclusive quantitative analysis to determine the Project's climate change impact significance is not possible.

[13] The GHG emission pattern is in sharp contrast to that of VOC, which is characterized by a sharp emission peak (≈ 80% of total VOC emissions) within the first 2 weeks of windrow formation.

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*

Notwithstanding the above conclusion of insignificant direct global warming effects of the Project, the Project could still contribute, cumulatively, to the current trend of global warming and climate change from its GHG emissions. As its name implies, global warming is a global issue. It is the result of cumulative increase in GHG emissions worldwide from human activities associated with industrial/manufacturing, utility, transportation, residential, agriculture, and waste management sectors. The challenge in assessing the significance of the contribution of an individual project to global emissions and climate change impacts is to determine if the project's GHG emissions will result in a cumulatively considerable incremental contribution to the global phenomenon of climate change. Unfortunately, the analytic tools and scientific data needed to do this are not yet available. Therefore, it is impossible for a lead agency to arrive at any objective and definitive determination of impact significance for a project's specific and cumulative effects on global warming and climate change at this time. Nevertheless, due to the fact that California is the 12th to 16th largest emitter of CO2 in the world (California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks*, Staff Final Report, December 2006), and that the effects of climate change in California have already been confirmed in the current trends of warmer winters, decreased spring snow levels, shrinking snowpack of the high Sierra (Cayan et al., *Climate Scenarios for California*, California Climate Change Center, White Paper, March 2006), a project's GHG emissions should be reduced to the greatest extent feasible in order to be consistent with the intent and goals of the Governor's Executive Order and AB 32.

The RCWMD has determined that the Project's contribution to GHG emissions and thus global warming will be adequately mitigated with implementation of the following BMP/BPS to the greenwaste composting operation, as necessary:

MITIGATION MEASURES[15]:

GHG-1 Maintain a proper carbon to nitrogen (C/N) ratio in the greenwaste feedstock that minimizes NH3 and N2O emissions. To achieve this, feedstock composition shall not consist of any food waste. Grass and leafy feedstock must be mixed and homogenized with sufficient woody materials to avoid a low C/N ratio (BMP).

GHG-2 Initial humidity of the feedstock should be 65-75%, and a humidity of 50-60% should be maintained in subsequent stage (BPS).

GHG-3 Appropriate bulking agents should be added in the feedstock mix to render the necessary air-filled pore space throughout the composting process (BMP).

GHG-4 Addition of up to 10% of mature compost in the feedstock mix will ensure the early formation of humic substances and effective binding of soluble and volatile carbon and nitrogen sources (BPS).

GHG-5 The facility's vehicle fleet operation shall comply with future requirements of the California Air Resources Board's Low-Carbon Fuel Rule.

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

[15] BMP and BPS measures are adopted from the recommendations of the paper by Florian Amlinger, et al.

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***

3.3. CONCLUSIONS

3.3.1. MANDATORY FINDINGS OF SIGNIFICANCE

	Mandatory Findings of Significance	YES	NO
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓
b)	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		✓
c)	Does the project have impacts that are individually limited, but cumulatively considerable?		✓
d)	Does the project have an environmental effect, which will cause substantial adverse effects on human beings, either directly or indirectly?		✓

3.3.2. ENVIRONMENTAL IMPACT DETERMINATION

☐ The proposed project will not have a significant effect on the environment; it is exempt from CEQA under Category __ Exemption. A Notice of Exemption will be prepared.

☐ The proposed project will not have a significant effect on the environment, and a Negative Declaration will be prepared.

☒ The proposed project could have a significant effect on the environment, unless the mitigation measures described in the Environmental Assessment are incorporated into the project. A Mitigated Negative Declaration will be prepared.

☐ The proposed project may have a significant effect on the environment, and an Environmental Impact Report is required.

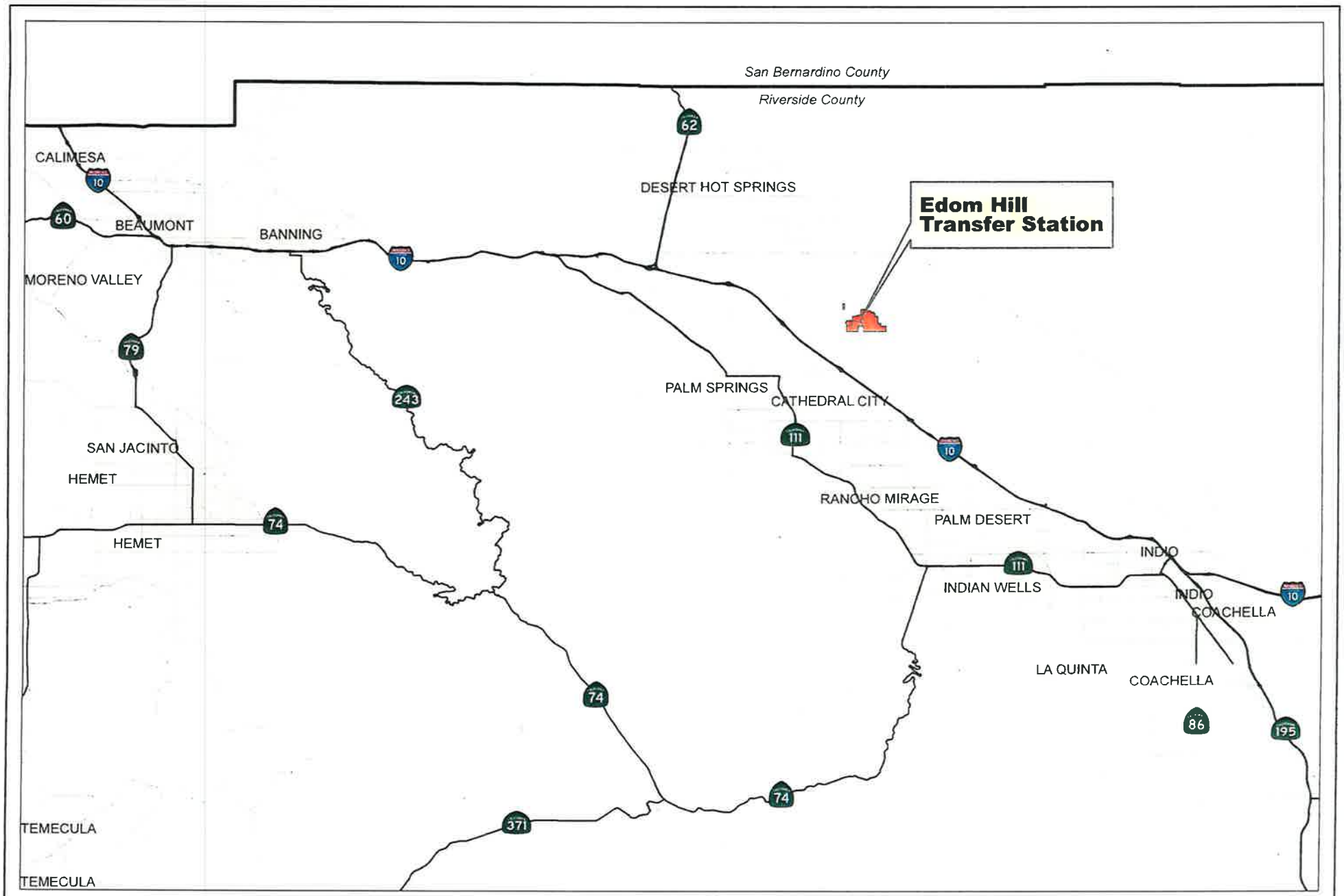
Environmental Assessment Prepared By: _____

Ryan Ross, Urban/Regional Planner IV

Environmental Assessment Completion Date: 11/23/09

4. EXHIBITS

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



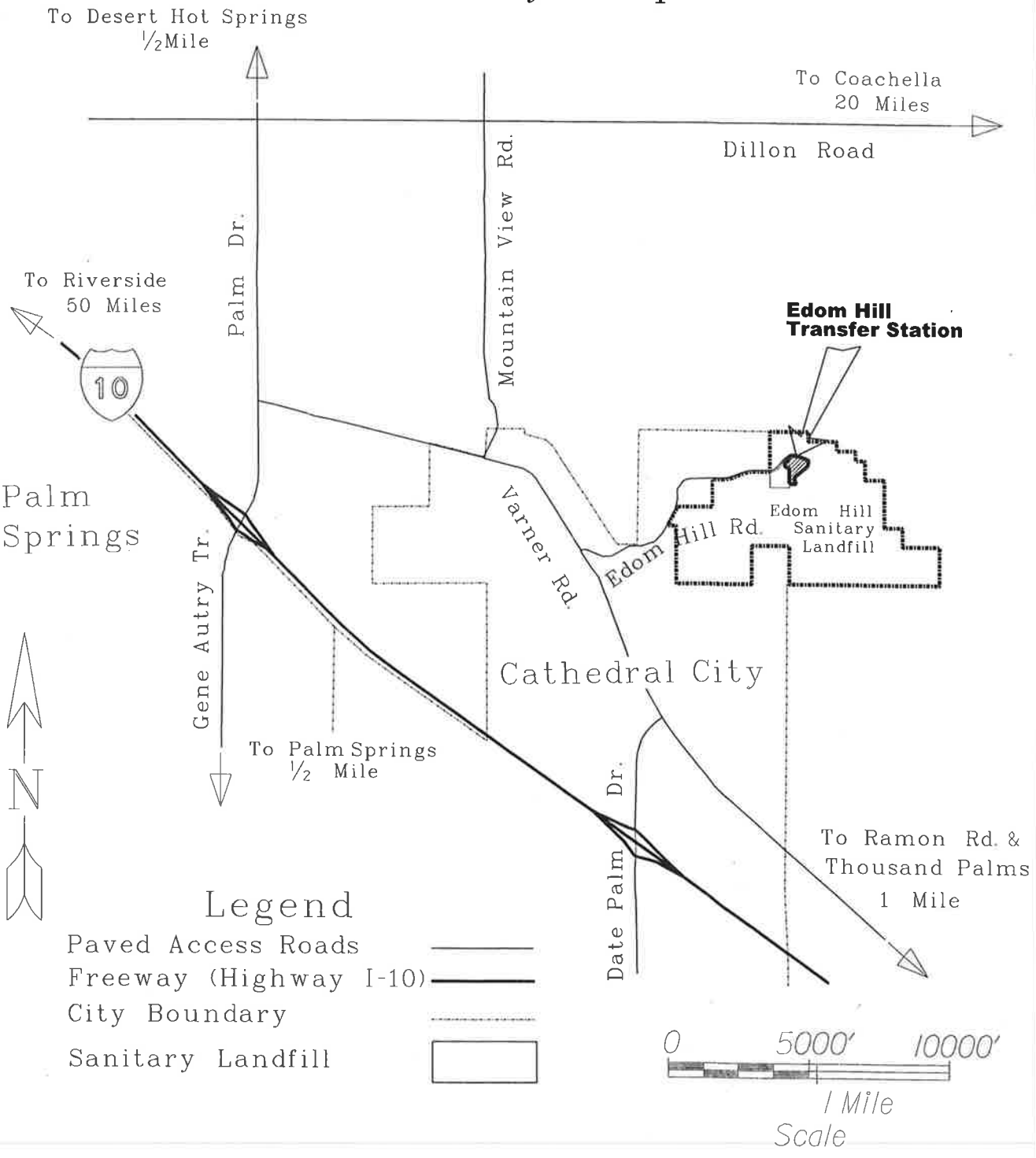
Riverside County
Waste Management Department

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/sites/vicinity_maps/ehvicinity_ts.dgn		Date: August 17, 2009
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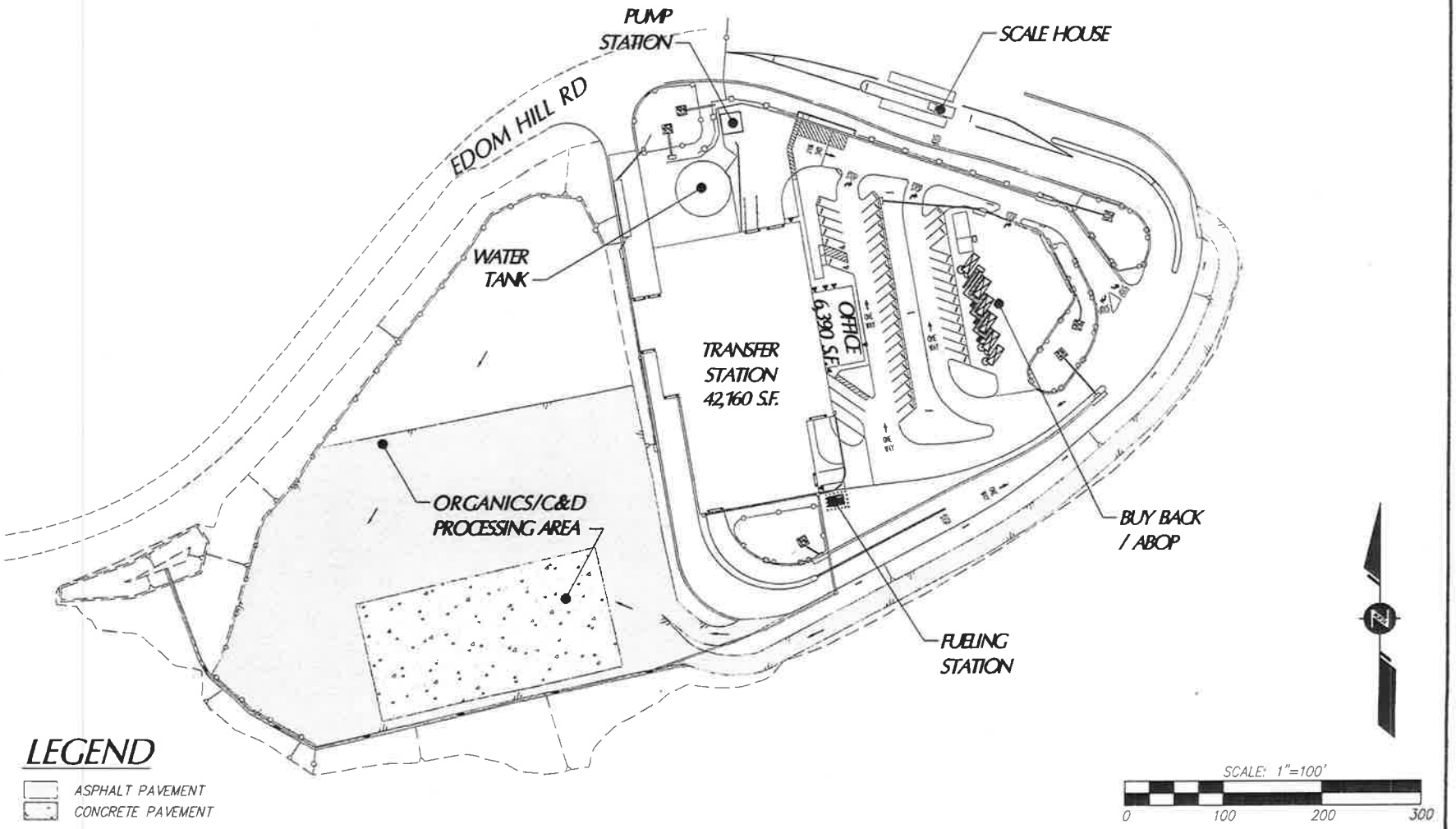
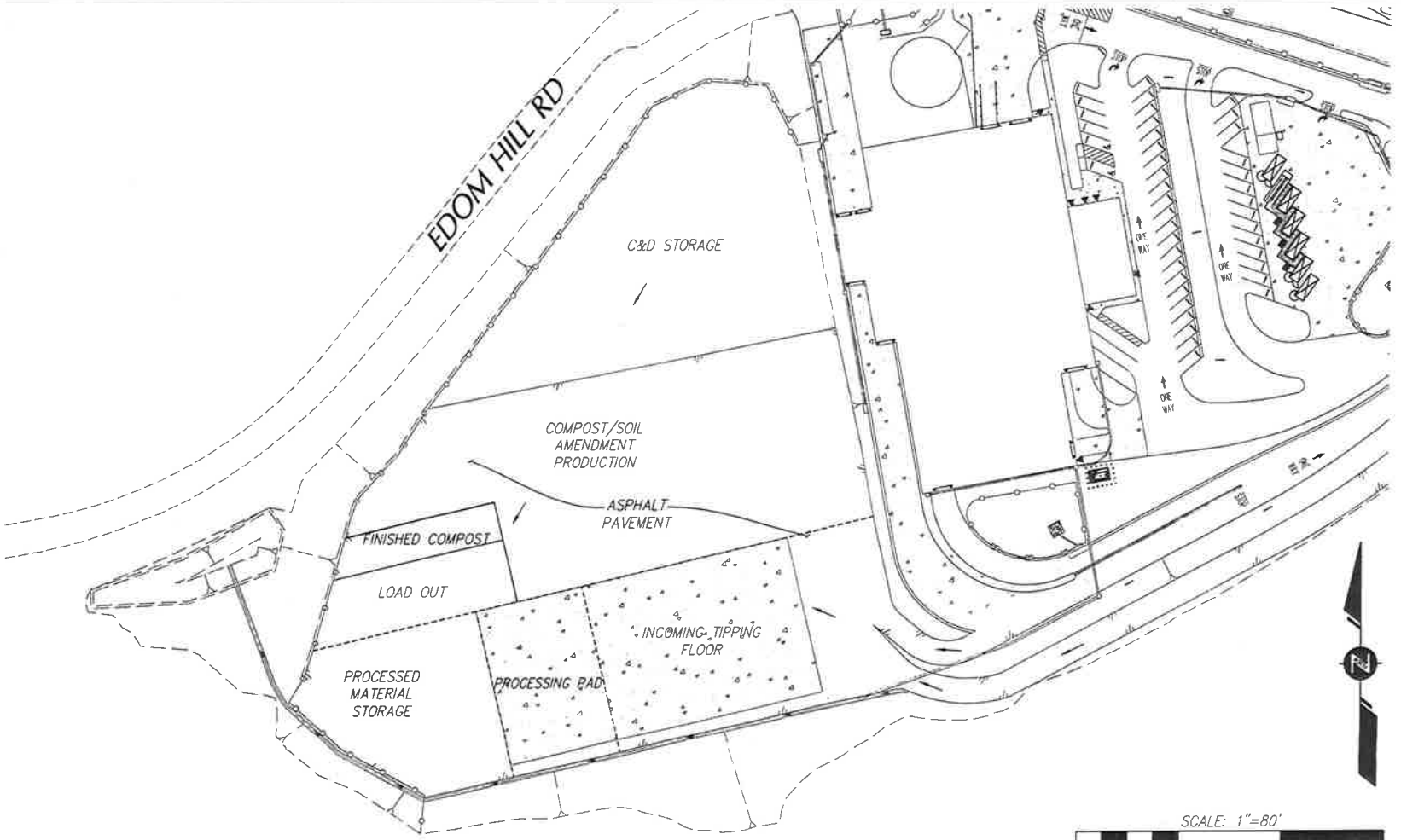


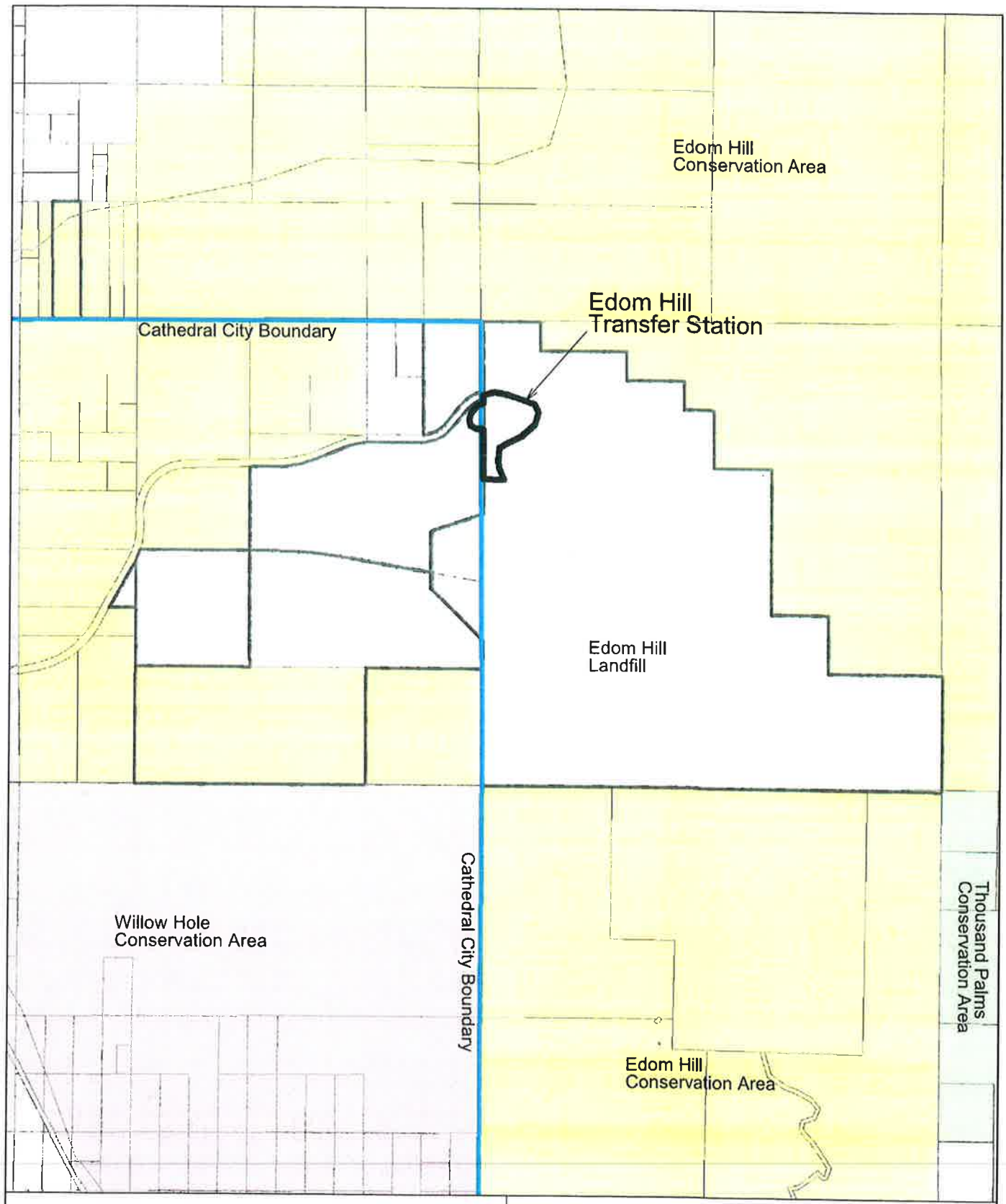
PROJECT: ---	FOR: ENVIRONMENTAL ASSESSMENT EHTS - 2009-02			Exhibit 3
PREPARED BY: K&A Engineering, Inc. — ENGINEERING, LAND PLANNING, SURVEYING — 357 N. SHERIDAN STREET, SUITE 117, CORONA, CALIFORNIA 92880, TEL. (951) 279-1800, FAX (951) 279-4310	OPERATOR: BURRTEC WASTE INDUSTRIES, INC. 9890 CHERRY AVENUE FONTANA, CALIFORNIA 92335	SHEET: SITE PLAN		
		SCALE: AS SHOWN	DATE: JULY 2009	CHECKED BY: K.O.	DRAWN BY: D.R.	JOB #: --

Drawing: K:\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
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) 279-4390	OPERATOR: BURRTEC WASTE INDUSTRIES, INC. 9890 CHERRY AVENUE FONTANA, CALIFORNIA 92335	SHEET: ORGANICS/GREEN WASTE PROCESSING AREA	
		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 - 04 - ORGANICS PROCESSING.dwg Layout: p 11x17 L Last Saved: Fri Jul 24, 2009 - 1:23pm Last Plotted: Fri Jul 24, 2009 - 1:27pm By: dereke



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

Greenwaste Composting Process	Throughput Capacity TPD (MT/d)	Composting Cycle (day)	Days Per Operation Schedule	Avg. CO_2-equ Emission Factor (Kg/Mg)[1]	GHG Emissions (MMT of CO_2-EQ)	Cumulative Throughput Tonnage On-site
	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