State of California – The Resources Agency ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
Environmental Review and Permitting
1416 Ninth Street, Suite 1260
Sacramento, California 95814

CEQA Filing Fee No Effect Determination Form

Applicant Name: County of Riverside **Date Submitted:** November 2, 2009

Applicant Address: 14310 Frederick Street, Moreno Valley, CA. 92553

Project Name: Waste Facility Permit (SWFP) Revision for Robert A. Nelson Transfer Station/Materials Recovery Facility (RAN TS/MRF)

CEQA Lead Agency: County of Riverside

CEQA Document Type: (ND, MND, EIR) MND

SCH Number and/or Local Agency ID Number: SCH # 2006031122

Project Location: 1830 Agua Mansa Road, Riverside, CA 92509. Latitude and Longitude: 117° 22' 51", 54° 02' 15" Section 2, T2S R5W of the San Bernardino Base and Meridian

Brief Project Description: The proposed project involves revising the existing SWFP for the RAN TS/MRF to allow the facility to: 1) perform windrow composting of greenwaste and woody waste; 2) store finished soil amendments up to 90 days; and 3) increase waste tires storage capacity to up to 1,500 tires. No new or expanded structures or facility construction, or grading of undisturbed land is proposed as part of the SWFP revision.

Determination: Based on a review of the Project as proposed, the Department of Fish and Game has determined that for purposes of the assessment of CEQA filing fees [F&G Code 711.4(c)] the project has no potential effect on fish, wildlife and habitat and the project as described does not require payment of a CEQA filing fee. This determination does not in any way imply that the project is exempt from CEQA and does not determine the significance of any potential project effects evaluated pursuant to CEQA.

Please retain this original determination for your records; you are required to file a copy of this determination with the County Clerk after your project is approved and at the time of filing of the CEQA lead agency's Notice of Determination (NOD). If you do not file a copy of this determination with the County Clerk at the time of filing of the NOD, the appropriate CEQA filing fee will be due and payable.

Without a valid No Effect Determination Form or proof of fee payment, the project will not be operative, vested, or final and any local permits issued for the project will be invalid, pursuant to Fish and Game Code Section 711.4(c)(3).

DFG Approval By: Michael Flores Date: 11/18/2009

Title: Acting Senior Environmental Scientist

DFG 753.5 (01/07)

Notice of Determination

COUNTY OF RIVERSIDE
WASTE MANAGEMENT DEPARTMENT

NOTICE OF DETERMINATION

TO:

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

X County Clerk
County of Riverside

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

For County Clerk's Use Only:

Original Negative Declaration/Notice of Determination was routed to County Clerks for posting on. RE 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: Robert A. Nelson Transfer Station/Materials Recovery Facility Solid Waste Facility Permit (SWFP) Revision Project; Mitigated Negative Declaration and Environmental Assessment (EA) No. RAN 2009-03

State Clearinghouse No.: 2006031122 **Contact Person:** Sung Key Ma, 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 Robert A. Nelson Transfer Station/Materials Recovery Facility is located within the Agua Mansa Industrial Park, at 1830 Agua Mansa Road, north of Highway 60 and west of the City of Riverside limit. (Section 2, T2S, R5W of SBBM/Portion of Riverside County. APNs 175-180-018, 175-190-029).

Project Description: The Project is a proposal to revise the Robert A. Nelson Transfer Station/Materials Recovery Facility SWFP to: 1) Permit for the production of compost and soil amendment by means of windrow composting of green and woody waste; 2) Permit on-site storage of soil amendment up to 90 days; and 3) Permit the storage of waste tires in 2 trailers to up to 1,500 tires. No changes to the daily capacity of 4,000 tons or composition of wastestream of the facility.

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 advise that the California Department of Fish and Game has made a "No Effect" Determination, and a *CEQA Filing Fee No Effect Determination Form*, dated November 18, 2009, will be filed with the NOD.

This is to certify that the Mitigated Negative Declaration for Environmental Assessment No. RAN 2009-03, 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: _____ **Title** Sandi Schlemmer, Deputy 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 12.2

Notice of Intent to Adopt a Mitigated Negative Declaration and Environmental Assessment No. RAN 2009-03

Riverside County
Waste Management Department
Hans W. Kernkamp, General Manager-Chief Engineer

Notice of Intent to Adopt a Mitigated Negative Declaration
Robert A. Nelson Transfer Station/Materials Recovery Facility
Solid Waste Facility Permit Revision
Environmental Assessment No. RAN 2009-03

The Riverside County Waste Management Department, on behalf of Riverside County as Lead Agency, has determined that a proposed revision to the Solid Waste Facility Permit (SWFP) for the Robert A. Nelson Transfer Station/Materials Recovery Facility (RAN TS/MRF), a municipal solid waste recovery and transfer facility, 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. RAN 2009-03 be adopted.

The proposed project involves revising the facility's SWFP in order to: 1) perform windrow composting of greenwaste and woody waste; 2) allow long term storage of finished soil amendments up to 90 days; and 3) increase waste tires storage capacity to up to 1,500 tires under a Minor Waste Tires Facility Permit. No new or expanded structures or facility construction is proposed as part of the SWFP Revision.

The MND and EA No. RAN 2009-03 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 Thursday. The documents have also been sent to the following libraries, but these libraries should be called directly for hours and availability of documents: Arlington Branch Library, 9556 Magnolia Ave. in Riverside (951.689.6612); Highgrove Branch Library, 690 W. Center St. in Highgrove (951.682.1507); Norco Branch Library, 3954 Old Hamner Road in City of Norco (951.735.5329); Rubidoux Branch Library, 5763 Tilton Ave. in Rubidoux (951.682.5485); 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: Sung Key Ma, Planner IV
Telephone: (951) 486-3200/Fax: (951) 486-3205
Email: sma@co.riverside.ca.us

Removed
11-9.09

Written comments must be received at the above address by 12:00 Noon on November 5, 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 November 17, 2009. 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

October 6, 2009
Sung Key Ma, Urban/Regional Planner IV

PD #79965

Solid Waste Facility Permit Revision
For
Robert A. Nelson
Transfer Station / Materials Recovery Facility

Environmental Assessment RAN 2009-03

October 2009

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

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1.0 INTRODUCTION

1.1. PURPOSE AND USE

1. The purpose of Environmental Assessment ("EA") RAN 2009-03 is to describe the proposed project (Project), its potential environmental impacts, and feasible mitigation measures to determine if potential adverse environmental effects caused by the Project can be reduced to below a level of significance. The Project addressed in this EA involves a proposed revision to the Solid Waste Facility Permit (SWFP) for the Robert A. Nelson Transfer Station and Materials Recovery Facility (RAN TS/MRF), an existing facility located in the unincorporated Rubidoux area of northwestern Riverside County.

2. The County of Riverside, as Lead Agency, and other responsible and regulatory agencies with approval authority over the Project, will use EA RAN 2009-03 to make informed decisions concerning the intended use and operation of the RAN TS/MRF.

1.2. COMPLIANCE WITH CEQA

1. EA RAN 2009-03 has been prepared and advertised in accordance with the Rules for Riverside County Implementing the California Environmental Quality Act ("CEQA") and will be used to satisfy the requirements of the State CEQA Guidelines Section 15063, "Initial Study."

2. Based on the information contained within EA RAN 2009-03, the Riverside County Waste Management Department (RCWMD), on behalf of Riverside County, 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 be adopted.

3. EA RAN 2009-03 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 Riverside County Board of Supervisors at the time that this body considers the Project.

4. Additional environmental information regarding the project site and the current 4,000 ton-per-day (tpd) transfer operation is contained in the following environmental documents, available at the Riverside County Waste Management Department, 14310 Frederick Street in Moreno Valley, CA and incorporated, herein, by reference:

    - Environmental Impact Report (EIR) with State Clearinghouse (SCH) No. 92022041 for the development of the 2,700 tpd North County Transfer Station and Materials Recovery Facility (later renamed the Robert A. Nelson Transfer Station and Materials Recovery Facility) at the Agua Mansa location in North Riverside, for which Resolution No. 94-261 certifying the EIR was adopted by the Riverside County Board of Supervisors on August 2, 1994. In addition to solid waste transfer and MRF activities, the EIR evaluated wood and yard waste processing, co-composting, a buy-back center, rail transfer, a household hazardous waste facility, administration facilities, and vehicle maintenance, including fueling, truck washing, and parking.

- Notice of Exemption (NOE) 2002-1, which was filed and posted with the Riverside County Clerk on May 1, 2002, to develop an interim open-air program at the transfer station to grind, sort, and transfer green/woody waste, on property owned by the RCWMD.

- NOE 2003-1, which was filed and posted with the Riverside County Clerk on February 13, 2003, to revise the Master Lease Agreement to establish a Permanent Green Waste Facility at the back area of the RAN TS/MRF, to accept out-of-County green waste for processing, and to allocate additional lease area to compensate for the displacement of a planned maintenance yard by the green waste facility.

- EA 40362, which was filed and posted with the Riverside County Clerk on July 11, 2006, to amend the State Solid Waste Facility Permit to increase the maximum permitted tonnage from 2,700 tpd to 4,000 tpd, expand the permit lease area to 22.03 acres, increase the total number of employees at the facility, modify the hours of operation, and allow for soil amendment production.

2.0 PROJECT DESCRIPTION

2.1. PROJECT LOCATION

1. The Project is a proposal to revise the SWFP for the RAN TS/MRF, an existing, municipal solid waste transfer station and material recovery facility situated on approximately 22.03 acres within the Agua Mansa Industrial Park, located west of Riverside city limits in the unincorporated area of Jurupa in northwestern Riverside County (refer to Exhibit 1, SITE LOCATION MAP).

2. The project site is accessed from State Highway 60 via Market Street to Agua Mansa Road or Rubidoux Boulevard to Market Street and Agua Mansa Road (refer to Exhibit 1, SITE LOCATION MAP). Access from I-10 in the north is via South Riverside Avenue to Agua Mansa Road.

3. The project site is located at 1830 Agua Mansa Road in Section 2, Township 2 South, Range 5 West of the San Bernardino Base and Meridian. It is also described as a portion of Riverside County Assessor's Parcel Numbers (APNs) 175-180-018 and 175-190-029.

2.2. ZONING/LAND USE

(Refer to Exhibit 2, 1000' Radius Zoning/Land Use Map)

1. The project site is zoned M-H (Manufacturing – Heavy).

2. All surrounding zoning is M-H (Manufacturing – Heavy).

3. The site is currently developed as a solid waste transfer station and materials recovery facility, with administrative offices and a waste collection operations yard located in the westerly portion of the site (refer to Exhibit 3, SITE PLAN).

4. Surrounding land uses include the following:

   North: Clean fuel station, County household waste collection facility, cement plant and quarry, soil amendment producer

   South: Recreational vehicle manufacturing plant

   East: Miscellaneous industrial and manufacturing facilities, including an indoor wood grinding facility and a Blue Rhino propane tank business

   West: Vacant industrial property

2.3. PROJECT BACKGROUND/CHARACTERISTICS

1. The RAN TS/MRF has been in operation since December 1997 and is operated by Burrtec Waste Industries, Inc. (Burrtec) through a lease agreement with the RCWMD. Since the original lease agreement, the lease area has increased to allow for organics and materials

recovery processing in an area of approximately 22 acres out of the total 26.75- acre site owned by the RCWMD (refer to Exhibit 3, SITE PLAN).

2. The RAN TS/MRF includes the following related components:

   - A pre-engineered metal building, comprising 1) a 56,698-square foot waste transfer facility, with 45,000 square feet of tipping floor, four (4) access doors for collection trucks, and two (2) below-grade transfer truck load-out ports, ii) a 50,609-square foot MRF facility, with 9,500 square feet of tipping floor, two (2) access doors for trucks delivering commingled and source-separated recyclable loads from residential and commercial recycling programs, and a six-bay loading dock for sorted recyclables, and iii) a 5,091-square foot office area

   - Green and woody waste processing area (southeast of TS/MRF building)

   - Soil amendment production area (east of greenwaste processing area)

   - Buy-back/drop-off recycling center (located within the MRF facility)

   - A 700-square foot household hazardous waste (HHW) storage area (northwest of TS)

   - Two (2) entrances and two (2) scale houses, one on each side of the TS/MRF building

   - A scale house computer system operating four (4) 70-foot in-floor scales

   - Employee and public parking stalls along the northwesterly side of the TS/MRF building, with on-site parking for transfer vehicles along the more easterly side of the TS/MRF building

   - Transfer truck tarping facility along easterly portion of TS/MRF

   - Maintenance facility

   - Fuel facilities for fueling equipment and vehicles (the adjacent LNG clean fuel station is not a part of the SWFP)

   - Incidental storage areas for equipment, baled recyclables, and containers

3. The RAN TS/MRF is currently operating under SWFP No. 33-AA-0258, issued by the Riverside County Local Enforcement Agency (LEA) of the Riverside County Environmental Health Department on November 25, 1997. The green and woody waste processing operations, which did not start until 2002, were conducted under an Enforcement Agency Notification on a portion of the lease area not covered by the SWFP.

4. The existing facility is designed to provide a location for the diversion of recyclable materials from the local wastestream. The facility includes a Materials Recovery Facility (MRF) capable of processing commingled and source separated recyclables, as well as, the recovery of recyclable materials from select commercial waste loads. Likewise, residue is

removed from incoming green and woody wastes before the material is ground, transferred as ADC or further processed and transferred to approved end uses (i.e., soil amendment outlets, biomass).

5. On February 14, 2007, the LEA, with concurrence from the California Integrated Waste Management Board (CIWMB), issued a revision to Solid Waste Facility Permit 33-AA-0258 to permit the following amendments to the facility design and operation:

   - Changed the hours of operation as follows:

Table 1 - Hours of Operation under the 2007 SWFP

Activity	Days	Hours
From		
Office	Monday – Friday	8:00 a.m. – 5:00 p.m.
Scalehouse	Monday – Sunday	7:00 a.m. – 6:00 p.m.
Transfer Station		
Receipt of Waste	Monday – Sunday	7:00 a.m. – 6:00 p.m.
Loading	Monday – Sunday	24 hours
To		
Scalehouse (Inbound Receipt of Waste)	Monday – Sunday	5:00 a.m. – 8:00 p.m.
Outbound Residuals and Recyclables	Monday – Sunday	4:00 a.m. – Midnight
Internal Operations (Office, MRF, Loading, Facility/Site Maintenance)	Monday – Sunday	24 hours
Green and Woody Waste Processing	Monday – Sunday	7:00 a.m. – 6:00 p.m.

   - Changed the permitted tons per operating day from a maximum of 2,700 tpd (2,100 tpd for non-hazardous waste, 600 tpd for separated or co-mingled recyclables) to a maximum of 4,000 tpd for all waste material types received onsite (municipal solid waste, green and woody waste, recyclables, construction/demolition (C&D) debris, etc.).

   - Inclusion of the existing green and woody waste processing operations (also called organics processing facility), eliminating the need for separate Enforcement Agency Notification and adding the production of soil amendments to permitted activities.

6. The permitted traffic volume for the RAN TS/MRF is 1,582 vehicles per day, which will not change under this proposal.

7. The proposed Project will revise the current State Solid Waste Facility Permit to introduce the following administrative and operational changes:

- Revise the Transfer Processing Report (TPR) to identify the specific areas within the MRF/transfer building and throughout the site for the storage of various recovered materials. Proposed storage areas are identified in Table 2.

- Permit for the production of compost by means of windrow composting of greenwaste at a capacity up to 175 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 for the production of soil amendments from processed greenwaste at a capacity of up to 266 tpd, in accordance with the requirements and standards incorporated in the RCI.

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

Table 2 - Proposed Materials Storage Areas

Item	Storage Location
Received commingled recyclables	MRF tipping floor
Baled recyclables	Inside and outside east wall of MRF
Glass	Roll-off boxes north of MRF tipping floor doors
Carpet	West end of transfer station tipping floor
Mattresses	West end of transfer station tipping floor next to carpet
Metals	Roll-off boxes outside western-most door of transfer station, southeast of south scalehouse along property line, along north side of transfer tunnel ramp, and along east property line of C&D processing pad
Waste Tires	In transfer trailers (up to 2) at south end of C&D processing pad
Soil Amendments/Compost	East corner of the TS/MRF
E-Waste	East wall of MRF building between the building and transfer tunnel
Trash	Transfer Station tipping floor, roll-off boxes adjacent to tire trailers on C&D processing pad
Empty roll-off boxes	Northwest corner of Soil Amendment Area
Hazardous Waste	Hazardous waste storage area at northwest corner of transfer station
Hazardous Waste (Temporary)	West side of organics processing area, east side of MRF tipping floor, central area of south wall of transfer building

2.4. PROJECT OPERATIONS

2.4.1. Transfer Station/Materials Recovery Facility

1. The existing holiday schedule includes the following holidays: Memorial Day, Easter, Fourth of July, Labor Day, Thanksgiving, Christmas, and New Year's Day. All other hours will be as specified in the approved SWFP.

2. Residual solid waste for disposal is primarily transferred to the Badlands Landfill, located east of Moreno Valley off State Highway 60 and the El Sobrante Landfill, located south of Corona off Interstate-15. Only under contingency circumstances would the Lamb Canyon Landfill, located south of Beaumont on SR 79, be used for disposal of the residual waste from this facility. (See Exhibit 4, Existing Regional Landfills in Western Riverside County)

3. The RAN TS/MRF has 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. The RAN TS/MRF is currently staffed with up to 245 properly trained employees, operating two full shifts.

4. All commercial collection trucks and self-haul vehicles are stopped at the scalehouse. The scalehouse attendant visually inspects the exterior of incoming loads for unacceptable wastes (i.e., hazardous waste) and to ensure that they are tarped or otherwise covered. Uncovered loads will be charged an additional fee.

5. Vehicles carrying municipal solid waste (MSW) are weighed at the scalehouse on a state-certified scale. Each commercial collection truck is 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 by entering the transfer station, as directed, through different access doors than the self-haulers and unloading in designated areas of the tipping floor.

7. To promote efficiency and safety, waste transfer vehicles enter the project site using the west entrance. Transfer vehicles for green waste and recyclables use the east entrance.

8. MSW is unloaded onto the tipping floor, pushed to the load-out area, and then top-loaded into transfer trailers. Transfer trailers can be loaded on a continuous basis. Transfer trailer vehicles, which have a capacity of ±23 tons, are cleaned of external debris and tarped before leaving the site at the facility's tarping station located northeast of the loadout tunnel.

9. In order to detect ineligible materials from being accepted at the RAN TS/MRF, all unloading activities are monitored by spotters. Any hauler observed unloading hazardous waste will be 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 the hauler is already gone when ineligible waste is detected, an attempt will be made to identify the generator and/or hauler of the ineligible waste to obtain their cooperation in the proper management and disposal of the ineligible waste. If the generator or hauler is not identified, employees will transfer the waste to the hazardous waste storage area. When acutely or dangerous hazardous waste is identified that poses an immediate threat to life and health, the tipping area will be blocked off, until the appropriate authorities (e.g., Hazardous Materials Division of Riverside County Environmental Health Department) is contacted and a licensed hazardous materials service provider safely removes the hazardous waste. Further, the facility is subject to the provisions of Riverside County Ordinance 779.1, which require focused load inspections based upon daily tonnage entering the facility.

10. Recovered recyclables, including inert construction and demolition waste, processed greenwaste, soil amendments, and finished compost will be transferred via transfer truck to secondary materials markets.

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. Transfer trailers and the tipping floor provide emergency storage capacity for solid waste that does not get transferred at the end of the 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. Salvaged materials from the transfer station tipping floor, such as cardboard, metals, and wood, are placed in separate bins or roll-offs before being transferred offsite to recycling facilities. Bulkier wastes, such as mattresses, concrete and asphalt, occasional tires, and large metallic items or white goods may be staged in designated areas of the tipping floor before being loaded into container for transfer offsite.

13. Bins or roll-offs are stored within designated area(s) of the transfer station, both inside and outside the building.

14. Recovered glass is stored in either containers or outdoor bunkers located along the east wall of the MRF building.

15. The transfer station facility and equipment are maintained in a state of good repair under an ongoing preventive maintenance program.

16. The transfer station is managed and maintained to prevent 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. Any illegally or indiscriminately dumped materials attributable to the operation of the transfer station along the primary delivery routes of Agua Mansa Road, and Market Street and Rubidoux Boulevard north of Highway 60 are collected at least twice weekly.

17. The Project will increase the existing waste tire storage capacity to up to 1,500 tires. This amount of waste tires will be stored in two top-covered transfer trailers located in the same place where the existing waste tire storage roll-off bins are placed and adjacent to the C&D storage area. However, it is the intent of the operator that waste tires will be shipped out as soon as a trailer is filled, which may take 4 to 5 weeks. A Minor Waste Tires Facility Permit will be required for this operation, pursuant to California Public Resources Code, Division 30, Chapter 16. All permit requirements and applicable state and local fire code standards will be adhered to.

2.4.2. Organics Processing Facility

1. The existing organics processing facility is located along the rail spur in the southeastern portion of the project site.

2. The 2007 revision to the SWFP increased the project site acreage to include the organics processing facility. The organics processing facility consists of 2.31 acres for organic processing, 4.71 acres for processed material, and an additional 3.0 acres for soil amendment and stockpile.

3. The organics processing facility is designed to process green waste and construction/demolition wood wastes to produce marketable organic products.

4. Moving in a southeasterly to easterly direction, the organics processing area, as shown on Exhibit 3, SITE PLAN, includes an area for inert C&D materials with a concrete push wall, a commercial greenwaste area that includes a trash enclosure and roll-off bin, a greenwaste processing area that includes two (2) above-ground fuel tanks, a residential curbside greenwaste area, and a processed material area. The area east of the greenwaste processing area will be used for the production of compost and soil amendments from processed green and woody waste.

5. The organics processing facility receives and handles the following materials currently being accepted at the RAN TS/MRF:

    - Greenwaste collected from residential greenwaste recycling programs
    - Greenwaste from commercial landscape contractors
    - Greenwaste delivered by the general public
    - Untreated wood waste from contractors
    - Untreated wood waste delivered by the general public
    - Inert C&D materials, such as concrete and asphalt

6. A large portion of the green and woody waste feedstock is currently chipped and ground to produce mulch, biofuel, and greenwaste ADC. On-site storage of the chipped and ground greenwaste is in accordance with the time limits established in Rule 1133.1 of the South Coast Air Quality Management District (SCAQMD).

7. A small portion of the green and woody waste feedstock is currently processed for production of soil amendments. 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 10 to 21 days. Current production rate averages at approximately 1,500 tons per month. Future soil amendments production under the Project and a revised SWFP is estimate to peak at a daily throughput capacity of 266 tons.

8. Up to 175 tpd of processed green and woody waste feedstock will be composted in open windrows within the existing soil amendment production area under the Project and a revised SWFP. No food waste will be used in the compost feedstock. Greenwaste composting will be conducted on a 60-90 cycle.

9. 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 contents, and 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 and containing approximately 800 tons of feedstock materials. Periodic turning of the composting windrows will be performed to ensure aerobic decomposition of the organic matters.

10. 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.

11. The Project's estimated daily maximum capacity for all greenwaste activities at full operation of the organic processing facility is 700 tons.

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

13. The greenwaste grinding area is concrete-paved. The soil amendment production portion of the organics processing facility is compacted soil graded to drain at one percent from northeast to southwest. The ground surface of the future greenwaste composting area will be engineered to minimize infiltration by leachate generated from the composting materials, when required.

14. A 20-foot high litter control fence has been constructed along a portion of the rail spur to control windblown litter.

15. The equipment that is being used to process the green and woody waste consists of the following:

    - Two (2) trommels, located in the residential curbside area
    - One (1) horizontal grinder, located in the processing area

- Ten (10) station manual sort line, located in the processing area
- One (1) grapple bucket excavator
- Two (2) bucket loaders

16. Staffing for the organics processing facility at peak operation is 15 employees. Personnel for handling greenwaste composting will be trained in accordance with the requirements set forth in CCR, Title 14, Section 17867.5

17. Vehicles transporting greenwaste and wood waste to the organics processing facility enter through the northwest entrance where they are weighed and initially inspected at the scalehouse. They are then directed to the appropriate processing area depending on whether they are carrying residential curbside greenwaste, commercial greenwaste and wood waste, or construction/demolition wastes.

18. Incoming greenwaste and wood waste is inspected by onsite personnel to remove contaminating materials, in compliance with CCR, Title 14, Section 17868.5(a). Specifically, once the greenwaste is unloaded, a wheeled front-end bucket loader then places the material into the hopper of a trommel screen. The trommel removes fines and conveys them to a separate pile. The fines are generally used in those materials suited to soil amendment and some will be used for composting. Once screened, the remaining material passes over the sort line where additional unacceptable materials are removed. Contaminating materials are separated by metals, glass, plastics, and trash, which are deposited into one of three 40-cubic yard roll-off bins beneath the sort line. The clean greenwaste drops off the conveyor and is staged in a pile. A wheeled bucket loader then places the material into the hopper of a horizontal grinder that further processes the material.

19. The ground material is either transported to end-users, such as mulch to the landscaping market, biofuel to Colmac Energy in Mecca, ADC at a landfill, or moved to a soil amendment production area for further processing to produce soil amendment and compost. Soil amendments and finished compost are screened one more time to remove contaminants before delivery to market.

20. After floor sorting for dimensional lumber, C&D wastes are stored on the organics tipping pad and against the concrete push wall, until final delivery of the material to off-site C&D processing facilities.

2.4.3. Hazardous Waste Storage

1. Household hazardous waste (HHW) recovered from MSW in the transfer station and materials recovery facility through the loadcheck program is temporarily stored (generally for 90 days) in a 665-square foot, canopied and fenced area, located adjacent to the west side of the transfer station building. The storage area is equipped with a hose bib and eyewash and secured with lockable fence doors during non-operational hours.

2. Only employees who have been fully trained and certified to handle hazardous waste will handle hazardous waste.

3. The hazardous waste storage area is periodically emptied by a licensed hazardous waste contractor and transported to a permitted disposal or recycling facility. The contractor packages, labels, marks, and manifests the hazardous waste in accordance with the Department of Toxic Substances Control (DTSC) regulations. The transport vehicles will be correctly placarded according to the applicable Department of Transportation regulations. The transfer station operator maintains copies of all manifests and other required records.

2.5. PROJECT SUMMARY & OBJECTIVES

The Project proposes to revise the current Solid Waste Facility Permit to accommodate the following major changes:

1. To perform windrow composting of greenwaste and woody waste;

2. To allow long term storage of finished soil amendments up to 90 days;

3. To increase waste tires storage capacity to up to 1,500 tires under a Minor Waste Tires Facility Permit.

The Project has the following objectives:

1. Assist Riverside County and cities in Western Riverside County in meeting the landfill diversion goals of AB 939 (Assembly Bill 939 *et seq.*, California Integrated Waste Management Act of 1989);

2. Contribute to the achievement of the Riverside Countywide Integrated Waste Management Plan's objective to preserve landfill capacity through recycling and composting of organic waste;

3. 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;

4. Produce marketable organic products for sale and/or reuse;

5. Provide additional diversion options for greenwaste;

6. Enhance efficiency of waste tires recycling.

2.6. PERMITS AND APPROVALS

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

- Mitigated Negative Declaration for EA ***(County of Riverside)***

- Non-disposal Facility Element Amendment, if required ***(RCWMD, Riverside County Solid Waste Advisory/Local Task Force (LTF), and CIWMB)***

- Solid Waste Facility Permit Revision/Compostable Materials Handling Facility Permit ***(CIWMB; LEA)***

- Registration under Rule 1133 and Rule 1133.1 ***(SCAQMD)***

- Alternative Odor Management Plan under Rule 410 ***(SCAQMD, LEA)***

- Waste Discharge Requirements and/or Water Quality Management Plan, if necessary ***(Regional Water Quality Control Board, Santa Ana Region (SARWQCB))***

- Minor Waste Tires Facility Permit ***(CIWMB; LEA)***

3.0 ENVIRONMENTAL ISSUES ASSESSMENT

3.1. EA CHECKLIST

The environmental issues associated with revising the SWFP for the RAN TS/MRF were determined by responding to the EA Checklist. 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.

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.

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?				√
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		√		

	Potentially Unavoidable Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
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)?				√
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 1997 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)?				√

	Potentially Unavoidable Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
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?				√
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:**				

	Potentially Unavoidable Significant Impact	Less Than Significant Impact After Mitigation	Less Than Significant Impact	No Impact
a) Power or natural gas?				√
b) Communications systems?				√
c) Local or regional water treatment or distribution facilities?				√
d) Sewer or septic tanks?				√
e) Storm water drainage?				√
f) Stormwater treatment control BMPs (e.g., water treatment basin, constructed treatment wetland), the operation of which could result in significant environmental effects (e.g., increased vector or odor)?		√		
g) Solid waste disposal system?				√
h) 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 IMPACTS 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 Jurupa Area Plan – Land Use Map. The operation of a transfer, recycling, and compost facility, which offers essential solid waste services to the unincorporated communities and cities in the northwestern portion of Riverside County, is consistent with this land use designation and the *General Plan*.

As indicated in Exhibit 2- 1000' Radius Zoning/Land Use Map, the project site and the surrounding area are zoned M-H (Heavy Manufacturing). Per Riverside County Land Use and Zoning Ordinance No. 348, the M-H classification identifies several permitted or conditionally permitted uses similar in nature to those at the facility. These include:

- Recycling Collection Facilities
- Recycling of Wood, Metals, and Construction Waste
- Nurseries and Garden Supplies
- Fertilizer Production
- Recycling Processing Facilities
- Disposal Service Operations
- Hazardous Waste Facility

However, because the RAN TS/MRF is deemed a public project, the proposed Project is not subject to the zoning requirements per Section 18.2.a.b.(1) of Ordinance No. 348, which states, in part, that "no federal, state, county or city government project shall be subject to the provisions of this ordinance."

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 current RAN TS/MRF was identified in the 1984 Riverside County Solid Waste Management Plan (CoSWMP), as well as the current Riverside Countywide Integrated Waste Management Plan (CIWMP) as a solid waste facility designated to provide waste transfer and recycling services to the jurisdictions of northwest Riverside County. Specifically, the facility was included in the 1992 County's Source Reduction and Recycling Element (SRRE), the 1994 Non-Disposal Facility Element (NDFE), and the 1996 Summary Plan of the CIWMP. The Project will not change the character of the facility as designated in these three documents.

Riverside County Non-disposal 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 RAN TS/MRF is identified and described in the Riverside County NDFE and allows for expanded organics processing and recycling thus providing further assistance to local jurisdictions in meeting mandated diversion goals. The Riverside County NDFE will be updated to reflect the proposed changes under the Project.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)
The project site is not located within any conservation area identified in the MSHCP. In addition, the RAN TS/MRF is an existing facility, and there is no new construction that will occur as a result of the proposed Project, nor any disturbance to any native habitat.

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

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

The proposed site is compatible with the existing land uses in the immediate vicinity. The proposed Project lies within the Agua Mansa Industrial Park (Specific Plan 210). It is surrounded by heavy industrial uses including a cement plant and quarry, construction yards, and other heavy industrial uses. The proposed activities are collocated with an existing transfer station and materials recovery facility. A greenwaste and wood waste processing facility is located immediately east of the site. A soil amendment production facility is located immediately north of the site. Both of these uses are similar to the greenwaste processing and soil amendment production components of the RAN TS/MRF. In conclusion, all proposed activities are compatible with surrounding 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 Project lies approximately one mile south of the Riverside/San Bernardino County line and the City of Colton. All areas north of the project site within Riverside County are similarly zoned for heavy industrial development, as well as, those areas north of the County line in San Bernardino County and the City of Colton. The project site is not located within the sphere of influence of the City of Riverside.

FINDING: Less Than Significant Impact

e) Would the project affect agricultural resources or operations?

There are no agricultural resources or operations in vicinity of the project site. While the project site is designated on the Riverside County General Plan as "Prime Farmland" and was historically farmed, as many of the surrounding properties, the project site is an established transfer station and materials recovery facility in an industrial park. The project site and surrounding properties have been or are being developed with industrial and manufacturing land uses, in accordance with the underlying Agua Mansa Industrial Corridor Specific Plan, which was approved by the Board of Supervisors in June 1986, along with corresponding EIR No. 216.

The land use impact resulting from the loss of farmland was fully assessed in EIR No. 216, resulting in the Board making overriding findings.

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 Project is located within an existing industrial park and surrounded by similar heavy industrial land uses. No established residential community is located in the immediate project area.

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 transfer station and materials recovery facility has been in operation since 1997. The Project will not cumulatively induce growth, causing any impact to population projections.

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 will utilize existing infrastructure. No physical modifications will be made to the site under the proposed Project, and will not create a need to extend any major infrastructure.

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

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

The Project is located in an established land use within an industrial park and has no impact to existing housing stock.

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 proposed greenwaste composting will not require the construction of new buildings and facilities or the modification of existing building and facilities. All existing structures and improvements have been designed and constructed per the seismic specifications of the County of Riverside, Uniform Building Code (UBC) as well as other relative regulations and codes. The geologic report prepared by Converse Consultants in 1992 for the project site indicated that there were no onsite faults, that the site is not located within either an Alquist-Priolo Special Studies

Zone or a County Fault Hazard Zone, and that the site was located within Seismic Area 4 of the UBC. It indicated that the site was not susceptible to ground rupture due to faulting, thus resulting in no additional exposure or impacts.

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?

The project site is located in an area of Southern California that is generally subject to seismic activity from regional and local faults. The site is also located within an area of Moderate Liquefaction Potential as designated in the Riverside County General Plan. The proposed greenwaste composting will not require the construction of new buildings and facilities or the modification of existing building and facilities. All existing structures and improvements have been designed and constructed per the seismic specifications of the County of Riverside. Future composting activities will occur on an open pad with no new structures that may be impacted by a seismic event.

MITIGATION MEASURES:

1. Following a seismic event, the operator of the RAN TS/MRF 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.

2. The operator of the RAN TS/MRF is required to prepare and/or update contingency plans that addresses risks of upset for approval by the appropriate regulatory agencies, if necessary.

3. Following a seismic event, the operator of the RAN TS/MRF 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.

4. Following a seismic event, the engineered surface areas used for future greenwaste compost activities will be examined for cracks. Surface cracks shall be repaired to prevent the infiltration of leachate from the compost.

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 located in an area that is 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?

There are no steep slopes or other conditions onsite that might result in landslides, mudflows, or rockfall. The Riverside County General Plan "Earthquake Induced Slope Stability Map" indicates that the site is not located in an area that is susceptible to seismically-induced landslides and rockfalls.

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

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?

Development of the windrow greenwaste composting facility will require minor grading and an appropriately engineered surface to minimize infiltration of compost leachate. All grading shall be performed under the guidelines of previous site-specific soils reports and the grading requirements of the County of Riverside.

FINDING: Less Than Significant Impact

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

As part of the original facility development, site-specific geological and soils tests were performed by qualified geotechnical engineers. The results of these tests, which were incorporated into final engineering for all structures and improvements, found that ground subsidence on the project site is unlikely. The proposed active compost facility is located on land that is free of the potential for settlement.

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

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

In the original EIR No. 216, a soils report was prepared by Geo-Ekta, Inc., which concluded that onsite soils were non-expansive.

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?

The project site does not contain any unique or geologic features that would result in or expose people to potential impacts. Unique geologic or physical features were also not destroyed, covered, or modified by the development of the project site in 1996/97, as confirmed by the geologic report prepared for the project site by Converse Consultants in 1992.

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?

Changes to absorption rates, drainage patterns, and the rate and amount of surface runoff are not expected due to construction of new building structures, because no new buildings will be constructed under the Project. Existing drainage facilities have been designed to prevent the uncontrolled flow of water and to prevent surface water from coming into contact with MSW, as indicated in Exhibit 6, Drainage Flow Plan. While the surface area of the future greenwaste composting production site will be engineered to 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 reasons: (a) the engineered surface will be 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; and (b) the increased runoff rate from the engineered surface is expected to be offset by absorption of precipitation by the greenwaste feedstock, soil amendment materials, and compost being stockpiled within the paved area. 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?

The facility is not located in an area that is subject to flood hazards. The Riverside County General Plan indicates that the project site is not located within a 100-year or 500-year flood zone. The general project area is protected from flood hazards by a County-maintained flood control system consisting of surface storm drains, subsurface pipes, and basins designed to handle a 100-year storm event. All existing facilities have been constructed to meet the surface drainage requirements of Riverside County and other applicable codes.

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

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 and recyclables are received and processed within the transfer station and materials recovery facility buildings. Green waste and C&D wastes are accepted and processed on an open-air paved tipping pad. Soil amendments are processed on a graded and compacted dirt surface. These outdoor activities could result in potential contamination of surface waters if organic materials or contaminants are permitted to leave the site in storm water surface flows. Future compost activities may also result in a potential contamination of surface flows. The proposed outdoor storage of waste tires could indirectly cause surface water contamination by pyrolytic oil and fire fighting water or chemical runoff in the event of a tire fire.

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:

1. 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 RAN TS/MRF shall be reviewed by the Riverside County Flood Control and Water Conservation District and the Santa Ana 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.

2. All municipal solid waste shall be processed indoors or contained in covered bins to prevent exposure to surface water flows or rain water.

3. Any washing activities shall 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.

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

5. All truck and equipment maintenance shall be conducted over impermeable surfaces, with curb if deemed necessary.

6. 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.

7. The two above-ground diesel fuel tanks shall each consist of a secondary containment that meets the state and County Fire Codes. In order to ensure adequate containment capacity for fuel leaks, the secondary containment area of each tank shall be inspected quarterly for accumulation of wood chip and/or other waste debris, which, if identified, shall be cleaned out.

8. Any spillage of diesel fuel in association with the operation of the two above-ground diesel fuel tanks in the greenwaste processing area shall be cleaned up immediately using the appropriate absorbent. Disposal of used absorbent shall be in compliance with applicable regulations.

FINDING: Less Than Significant Impact After Mitigation

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

The proposed Project will neither result in significant increase in surface runoff discharge into nor consumption of water withdrawn from any water body.

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 will not alter the course or direction of existing surface or groundwater movements. On-site drainage has been designed to conform to the existing drainage pattern of the general area. The facility has been graded to drain in the natural flow direction of northeast to southwest, which drains the site into a series of inlets into Riverside County-maintained storm drains.

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 proposed Project will not significantly increase the amount of water use at the facility. However, future greenwaste composting activities are estimated to increase water demand by no more than 9,000 gallons/day. Nonetheless, this insignificant additional water demand of the Project will not result in direct withdrawals of groundwater quantity. Nor will it cause direct discharge into the groundwater table. Minor grading that will occur during construction of the composting operations pad will not impact any aquifers.

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

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

The Project will not substantially alter the physical state of the site. Therefore, it will not create impacts that could result in altering the direction or rate of flow of groundwater.

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

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

The proposed composting facility will be designed so that all active composting operations occur on an engineered surface that limits infiltration of compost leachate. 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:

1. Prior to commencement of greenwaste composting activities, the operator shall obtain clearance from the Riverside County Flood Control and Water Conservation District and the Santa Ana Regional Quality Control Board (SARWQCB) that the existing Storm Waste Pollution Prevention Plan (SWPPP) and/or Water Quality Management Plan (WQMP) continue to meet requirements of the NPDES and Riverside County NPDES General Permit . If necessary, the facility operator will revise the SWPPP and/or WQMP to achieve compliance.

2. The greenwaste composting area shall consist of a protective surface engineered to control infiltration of liquids. Engineering options should include, but are not limited to, paving or lining of the composting area with an appropriate material. Construction of the composting pad may be phased with the growth of greenwaste composting capacity.

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?

Project water is provided through an existing distribution system operated by the West San Bernardino County Water District. The proposed Project will not require a significant increase in 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 9,000 gallons/day.

FINDING: Less Than Significant Impact

3.2.5. Transportation/Circulation

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

The proposed revision to the SWFP does not consist of increases in daily tonnage of waste received or the number of vehicles using the facility. The permit revision is limited to modifications to and regulation of internal operations only.

The previous Mitigated Negative Declaration (i.e., EA No. 40362) included an analysis of increased traffic resulting from the then proposed increase in daily tonnage from 2,700 tpd to 4,000 tpd. A Traffic Impact Analysis was prepared by Kunzman Associates that identified potential impacts to the local transportation system. The analysis proposed three mitigation measures that included:

1. Construction of a traffic signal and turn lane at the facility's main entrance.

2. Pay a "fair share" toward the construction of a traffic signal and turn lanes at Agua Mansa Road and Market Street.

3. Contribute toward a pavement restoration project for Agua Mansa Road.

The first and third mitigation measures have been implemented. The fair share payment for installation of a traffic signal at the Market Street and Agua Mansa Road intersection will be made upon completion of the engineering design and cost calculations for the signal by the Riverside County Transportation Department. No additional traffic impacts are anticipated from the proposed revision to the SWFP.

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

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 RAN TS/MRF is an established land use within an existing industrial park. The circulation system has been designed and constructed to accommodate heavy traffic associated with industrial development. Sight distance at all project entrances has been reviewed as part of the underlying parcel map (driveway openings are limited along Agua Mansa Road), during the initial design phase of the existing facility and through consultation with the Riverside County Transportation Department. The recent traffic signal and intersection improvements at the facility's main entrance have incorporated geometrics, design features, and sight distance that enhance traffic safety.

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

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

The RAN TS/MRF is an established land use located within an existing industrial park. The circulation system has been designed and constructed to accommodate heavy traffic associated with industrial development. The RAN TS/MRF site has 2 vehicular access points, each of which provides access to specific operation areas of the facility, including the proposed greenwaste composting operation area. This arrangement facilitates orderly internal traffic flows, enhances ingress and egress traffic safety, and provides adequate emergency access to the facility (see Exhibit 5, Traffic Flow Plan). Emergency access to adjacent land uses will not be affected.

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?

Adequate on-site employee, visitor, and handicap parking have been provided, in accordance with the Riverside County parking requirements. The project site also provides on-site parking for collection trucks and transfer trucks. The proposed greenwaste composting operation is not expected to increase on-site parking need, as the daily greenwaste throughput capacity is not expected to increase above the current permitted level of 700 tpd.

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 will not result in hazards or barriers for pedestrians or bicyclists. The project site is located within an existing industrial park. Infrastructure within the industrial park has been designed and constructed to meet urban standards for pedestrian and bicycle traffic.

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

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

The climate of the general project area, or the Rubidoux area, technically called an interior valley sub-climate of Southern California's Mediterranean-type climate, is characterized by warm summers, mild winters, infrequent rainfall, moderate afternoon breezes, and generally fair weather. The clouds and fog that form along the Southern California coastline rarely extend as far inland as the proposed project area, and if they do, they usually burn off quickly after sunrise. The most important weather pattern is associated with the warm season airflow across populated areas of the Los Angeles Basin, which brings polluted air into Rubidoux and Riverside County late in the afternoon. This transport pattern creates unhealthful air quality in all of the inland valleys in Southern California during the summer months.

Temperatures in the Rubidoux area average a very comfortable 64°F year-around, with warm summer afternoons (95°) and often cool winter mornings (around 40°). Rainfall in the project area varies considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April, with summers often completely dry. Rainfall in the Rubidoux area averages approximately 11.0 inches per year, but varies markedly from one year to the next.

Winds are an important parameter in characterizing the air quality environment of the project area, because they determine both the regional pattern of air pollution transport, as well as control the local rate of pollution dispersion near roadway sources. There is no known wind data available directly from the project site, but wind patterns are sufficiently homogeneous throughout the area that they can be estimated accurately without actual on-site data. Daytime winds across Corona and Riverside are from the SW-W at 6-8 mph as air moves locally up the Santa Ana River Valley from Orange County and regionally onshore from the cool Pacific Ocean to the warm Mojave Desert interior of Southern California.

Baseline Air Quality

Existing levels of ambient air quality and its historical trends and projections in the project area are best documented from measurements made by the South Coast Air Quality Management District (SCAQMD) at its Rubidoux air monitoring station. The Rubidoux station measures the complete spectrum of air quality parameters and has a monitoring history covering several decades.

A number of pollutants have come into attainment status within the last 10+ years in the Rubidoux area. These include Sulfur Dioxide, Nitrogen Dioxide, Carbon Monoxide, and Sulfate, as shown in the following:

Last Violation of:	**Year**
1-hour SO2 Standard	Pre-1989
1-hour NO2 Standard	Pre-1989
8-hour CO Standard	1990
24-Hour Sulfate (SO4) Standard	1995

Ozone (smog) continues to exceed standards, but an encouraging trend is also seen in the last decade. Violations of the federal hourly ozone standard of 0.12 ppm dropped from 90 days in 1990 to below 10 days from 2004 to 2007. Particulate Matters 10-micro and 2.5-micron in diameter (i.e., PM10 and PM2.5) continue to exceed standards and present a serious air quality problem for the Inland Empire area. PM2.5 levels are high throughout Western Riverside County. Rubidoux and neighboring Mira Loma are the PM2.5 "hot spots" in the South Coast Air Basin. Western Riverside County not only has high overall PM2.5 levels, but a large fraction of ambient PM2.5 is comprised of carcinogenic diesel particulate matter (DPM). Trucking activity along the SR-60 corridor in association with large warehousing operations upwind of Rubidoux is therefore of concern until current diesel control requirements achieve substantial marker penetration and thus reduce public health risk.

Air Quality Management Planning

The South Coast Air Quality Management District (SCAQMD) adopted an updated clean air "blueprint" in June 1, 2007. The 2007 Air Quality Management Plan (AQMP) outlines the air pollution measures needed to meet stiff new federal standards for ozone and PM2.5. These new stiff standards, however, come with slightly longer timeframes for attainment, namely, PM2.5 by 2014, 8-hour ozone by 2023, and 24-hour PM2.5 by 2020.

Standards of Significance

The SCAQMD CEQA Air Quality Handbook (1993) states that any projects in the South Coast Air Basin with daily emissions that exceed any of the following thresholds should be considered as having an individually and cumulatively significant air quality impact:

55 lb per day of ROG (75 lb/day during construction)
55 lb per day of NOx (100 lb/day during construction)
550 lb per day of CO
150 lb per day of PM-10
150 lb per day of SOx

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 hot spots.
- Project could emit carcinogenic air contaminants that could pose a cancer risk.

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

The Project is basically a proposal to conduct the current soil amendment production as a greenwaste composting activity and process a portion of the incoming greenwaste to produce finished compost. It will not increase the daily tonnage of the incoming waste processed at the RAN TS/MRF. A Compostable Materials Handling Facility Permit issued by the Riverside County Local Enforcement Agency will be required for project implementation.

Construction Air Emissions

The RAN TS/MRF is an established land use, and the proposed Project does not require construction of new or expanded structures. Therefore, no impacts from construction emissions are anticipated.

Operation Air Emissions

On-Site Materials Handling Equipment

The existing permitted equipment fleet for the waste transfer, materials recovery, greenwaste processing, and C&D operations is listed in Table A-3. This fleet entails active and stand-by equipment required for the daily operation of the RAN TS/MRF.

Since the Project will not increase the daily refuse tonnage received and processed at the RAN TS/MRF, no additional equipment or increase in equipment use intensity will be necessary. However, when greenwaste composting and soil amendment operations approach capacity level (i.e., 700 tpd), a water truck may be needed to deliver water to cover the entire soil amendment and compost production area for purposes of dust control as well as moisture conditioning of the composting feedstock. Due to the small acreage of the compost production area and availability of on-site water supply, it is estimated that a 4,000-gallon water truck would be required to operate approximately one full-engine-load hour per day to deliver an estimated daily water requirement of up to 10,000 gallons. The air emissions associated with this minor increase in on-site equipment use will be minimal and effectively offset by the reduction of the loaders' operation hours by up to 2 loader-hours per day from the current level of operation. The reduction of loader hours is primarily due to the fact that more greenwaste feedstock will be processed for production of compost and soil amendment, which will result in less production of wood chips and wood mulch, thus requiring less loader use to prepare daily off-site shipments of the ground wood products. In conclusion, the Project will not result in a net increase in criteria emissions from on-site mobile sources.

On-Road Mobile Source Emissions

Since the Project will not increase the daily waste processing capacity of the facility, there will be no net increase in vehicle trips and vehicle-miles-traveled from waste hauling activities. Therefore, the Project will not result in a net increase in on-road emissions from the baseline levels under the current permitted operation of the RAN TS/MRF.

Table A-3
Robert A. Nelson Transfer Station/Materials Recovery Facility Equipment Fleet

Type	Service Location	Quantity	Operation Hours/Day
Wheeled Loaders	MRF	1	10
Wheeled Loaders	Transfer Station	1	8
Wheeled Loaders	Transfer Station	2	10
Wheeled Loaders	Transfer Station	1	10
Wheeled Loaders	Greenwaste	1	8
Wheeled Loaders	Greenwaste	2	6-7
Water Truck	Greenwaste	1	1
Wheeled Pusher	Transfer Station	1	8
Tracker Dozer	Transfer Station	1	8
Tracker Dozer	Transfer Station	1	6
Grapple Bucket Excavator	Greenwaste	1	8
Forklift	Transfer Station	2	10
Forklift	MRF	2	10
Trommel Screen	Greenwaste	1	6
Trommel Screen	Greenwaste	1	6
Horizontal Grinder	Greenwaste	1	6
Skid Steer Loader	Transfer Station	1	8
Skid Steer Loader	MRF	1	8

Greenwaste Composting Emissions

The existing greenwaste processing operation at the transfer station has a peak load capacity of 700 tpd, the majority of which is chipped and ground to produce mulch, wood chips, and ADC for application at landfills. The remaining greenwaste feedstock is also chipped and ground and then further processed to produce soil amendment products. Soil amendment production has been running at an average rate of 1,500 tons per month in the last two years. The production of mulch, wood chips and landfill ADC is basically a wood chipping and grinding operation that generally requires from 3 to 14 days to complete, from receipt to shipping out of the materials. This is in compliance with Rule 1133.1 of the SCAQMD in terms of materials on-site storage time limits for the purpose of preventing inadvertent decomposition of the materials. The existing soil amendment production cycle takes from 10 to 21 days to complete, involving the processes of chipping and grinding of green and woody waste, blending fines of the feedstock with various soil materials and/or gypsum, and curing the blended feedstock in open static piles.

When the internal temperature of the ground greenwaste/soil amendment static piles reaches or rises above 122° F (50° C), active composting is initiated by definition in 14 CCR. For this reason, the Local Enforcement Agency (LEA) requires a Compostable Materials Handling Facility Permit (Composting Permit) for this aspect of the existing greenwaste processing operation at the facility. The soil amendment products are not finished compost; however, active composting reactions are incidental to their production, including potential emissions of volatile organic compounds (VOC), ammonia, and certain greenhouse gases. Since the Project focuses on regulating the existing greenwaste operation at the RAN TS/MRF under compostable materials handling requirements, this EA will evaluate for maximum possible project impacts by analyzing air emissions related to both the initial active composting of greenwaste during soil amendment production and the full greenwaste composting cycle (60–90 days) for production of finished compost as the project's net air emissions.

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 concern.[1] Therefore, this EA does not consider ammonia emissions from the Project an air quality issue

Impact Analysis for VOC Emissions:

According to the literature and data from field research in California, air emissions are most intense and consisting primarily of VOCs during the active phase of greenwaste composting, that is, within the first two to three weeks since formation of the windrows. Unfortunately, this is about the only consensus on composting VOC emissions among recent field research. Quantitative composting VOC emission factors, however, vary widely, from study to study, and sometimes, from one windrow to another, let alone seasonal variations. This analysis has

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

considered the following recent research studies 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[2]. (2) The CIWMB 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[3]. (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) 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[4]. The SCAQMD data was rejected 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 was also rejected, 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 study, because they are scientific, legitimate, valid, and directly applicable to greenwaste composting emissions analyses. This is supported by the SJVAPCD's action to adopt the Modesto study data and reject its own investigative study, based on Mr. Horowitz's arguments.

The field investigation at the Modesto facility finds that approximately 80% of the total VOC emissions occur within the first 14 days of composting.5 However, VOC emission rates are dependent upon various factors, of which feedstock composition and density, and windrow size and surface to volume ratio are among the most critical. This is because the feedstock density and windrow dimensions can affect the natural flow of air into the windrow from the bottom and sides and out of the windrow through the ridge-top (known as the "chimney-breathing" pattern of a windrow). These factors are hard to control and, thus, highly variable even from windrow to windrow, let alone from facility to facility. Therefore, an emission factor for each ton of feedstock material composted is a more preferable tool for quantification of composting emissions. This EA uses emission factors, instead of emission rates, for estimation of the Project's daily VOC emissions from proposed greenwaste composting. The emission factors used herein are adopted from the CIWMB's emissions testing study at the City of Modesto facility (Modesto study). According to the Modesto study, the lifecycle analysis emission factor for VOC emissions approximates 0.868 lb/ton of greenwaste composted in a 57-day cycle. Moreover, the study also estimates the emission factor for VOC emissions during the first 2 weeks at 0.6 – 0.7 lb/ton.

VOC emissions impact assessment for the Project is based on the maximum daily throughput capacity of the existing 21-day soil amendment production cycle and future 90-day full composting cycle. Due to seasonal variations in greenwaste generation and market demands for

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2 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.

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

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

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

soil amendment and compost products, the daily capacity of the greenwaste feedstock for each production cycle varies between the winter months and rest of the year. Generally, during the winter months where greenwaste feedstock generation is higher and product demand lower, greenwaste processing at the transfer station is shifted to the longer, 90-day production cycle. Conversely, the shorter, 21-day production cycle will prevail in the rest of the year, when soil amendment demand is higher. For purpose of analyzing full project impacts, it is assumed that the facility will process a daily maximum of 700 tons of greenwaste according to the schedules indicated in Table A-4. VOC emissions calculations are also included in the table.

As indicated in Table A-4, the Project's greenwaste operations under both operation schedules are expected to produce net VOC emissions in exceedance of SCAQMD's threshold of 55 lbs/day. However, an effective mitigation measure is available that can reduce the estimated VOC emissions to a level of insignificance. According to the Modesto study, capping the outer surface of the windrow with finished compost serves as a pseudo-biofilter, proving to be very effective in reducing VOC emissions throughout the lifecycle of the composting process. The study demonstrates that during the first 14 days of composting, the pseudo-biofilter windrow generated 75% less VOC compared to emissions from the regular greenwaste windrow. Hence, the study recommends that a pseudo-biofilter be employed as a best management practice (BMP) for purpose of reducing VOC emissions from composting. Applying this BMP to the Project would reduce the daily composting VOC emissions to approximately 51 lbs/day and 55 lbs/day, respectively, for the winter operation schedule and the non-winter schedule, in compliance with the SCAQMD significance threshold.

The Modesto study further demonstrates that VOC emissions from a composting windrow occur primarily within the ridge top area, which accounts for about 24% of the total windrow surface area, resulting in an estimated top versus side emissions ratio of 48.74. In other words, almost 98% of the VOC emissions occur in the ridge top area — a result of the "chimney-breathing" pattern of interior air flow caused by the temperature profile inside a windrow. Therefore, capping the ridge top area of a windrow with finished compost could reduce VOC emissions from soil amendment production by 73.5% (i.e., 75% x 98%). Applying this alternative mitigation scheme to greenwaste composting under the winter operation schedule would result in below threshold VOC emissions at 53 lbs/day [i.e., (48 + 152) lbs/day x (1-73.5%)]. However, capping of the entire windrow surface is mandatory for the composting operation during non-winter months, which requires the higher 75% emission reduction rate to keep VOC emissions in compliance with the significance threshold. Lastly, the pseudo-biofilter mitigation scheme will be a very feasible and practical mitigation method for the Project, because the mitigation agent, that is, finished compost, will be produced on site and not require importation from off-site sources.

Local Air Quality Impact

NO_X, CO, PM_{10}, and $PM_{2.5}$ could cause health impacts at high enough concentrations on sensitive receptors, such as schools, hospitals, and low income housing, in a project's vicinity. These local air quality impacts are a part of the environmental justice programs of local air districts. As discussed earlier, the Project will not result in additional emissions of these criteria pollutants of local air quality impacts. Further, the Project is located in an industrial park with no sensitive receptors in its vicinity. Therefore, it is determined that the Project will not result in local air quality impacts.

Table A-4
Robert A. Nelson Transfer Station/Materials Recovery Facility
Greenwaste Processing and Estimates of Volatile Organic Compounds (VOC) Emissions and Emission Reduction

Greenwaste Processing Schedule	% Total	Throughput Capacity (TPD)	Process Time (day)	% Total Composting Emissions	VOC Emission Factor (lb/ton)[4]	VOC Emissions (lbs/day)	Emissions Reduction Efficiency(5)	Mitigated Emissions (lbs/day)	Cumulative Throughput Tonnage On-Site
		A	B		C	D = A x C	E	F = D x (1- E)	A x B
Winter Operation Schedule*									
Mulch/ADC[1]	30	210	4	Rule 1133.1 compliance in terms of prevention of inadvertent decomposition during chipping & grinding processing					840
Wood Chips[2]	20	140	14						1,960
Soil Amendment[2]	14	95	14						1,330
Soil Amendment[3]	11	80	21	80% Thermophilic	0.600	48	75%	13	1,680
Composting (Static Piles)	25	175	90	100% Lifecycle	0.868	152	75%	38	15,750
Total	**100**	**700**				**204**		**51**	**21,560**
Spring, Summer, and Fall Operation Schedule*									
Mulch/ADC[1]	30	210	4	Rule 1133.1 compliance in terms of prevention of inadvertent decomposition during chipping & grinding processing					840
Wood Chips[2]	22	154	14						2,156
Soil Amendment[3]	38	266	21	80% Thermophilic	0.600	160	75%	40	5,586
Composting (Static Piles)	10	70	90	100% Lifecycle	0.868	61	75%	15	6,300
Total	**100**	**700**				**221**		**55**	**14,882**
							SCAQMD Significance Threshold	**55**	

* Since recycled greenwaste demands are lower in winter and early spring, greenwaste recycling schedule is naturally shifted toward the longer production cycles.

Notes:

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

MITIGATION MEASURES:

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.

2. During the winter operation cycle, where the combined daily throughput capacity of greenwaste composting and soil amendment production is no greater than 255 tons, the static piles can be constructed with a layer of finished compost covering only the ridge-top area of the piles.

3. Turn and aerate the windrows at the frequency specified in the Composting Permit, throughout the composting process to facilitate aerobic degradation of the greenwaste.

FINDING: Less Than Significant Impact After Mitigation

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

As discussed in the previous section, the Project would not cause any significant air emissions that will violate any established air quality standards. More important, the Project is an established land use located within an existing industrial park and surrounded by heavy industrial developments. No sensitive receptors are located within close proximity of the site.

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 proposed expansion of the facility will not alter air movement, moisture, or temperature, or cause any change in climate.

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

d) Would the project create objectionable odors?

An in-depth discussion of odor impacts from the operation of the RAN TS/MRF was carried out in EA No. 40362. It was then determined that odor would not become a public nuisance, provided that BMP's that ensure cleanliness of the tipping floors at the end of a working day and prohibit uncovered storage of putrescible MSW, such as food waste, within the facility overnight are implemented. Enforcement of these odor-minimizing BMP's in the current facility operation has thus far produced satisfactory results, as the facility operator has yet received any odor complaints or citations by any regulatory agency.

Since the proposed greenwaste composting operation will not involve food waste or other odiferous matters, such as grease trap waste, sludge, or manures, odor generation is not expected to be significant. Moreover, the composting process is required to avoid anaerobic conditions, which would generate some odorous air emissions. Lastly, the facility is located within an industrial park where sensitive receptors or land uses, such as residences, schools, childcare

facilities, hospitals, are absent in the general neighborhood. In conclusion, the Project is not expected to general odors that would cause a public nuisance to any sensitive receptors.

MITIGATION MEASURES:

1. Existing best management practices to minimize odor generation from MSW handling at the facility shall continue to be implemented. The BMP's shall include, but not limited to, the followings:

   a) Residual MSW is transferred on a daily basis. Waste that has not been transferred at the end of the day is loaded into a transfer trailer(s) and kept inside the transfer building overnight, with additional capacity provided on the tipping floor. Except for consecutive holidays, residual MSW shall not remain at the facility for more than 48 hours.
   b) The facility site is cleaned daily to remove loose material and litter. The tipping areas are swept regularly. Boxes, bins, and containers are cleaned on a regular basis.

2. 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.

3. 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.

4. 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.

5. The transfer station operations shall comply with SCAQMD Rule 402 (*Nuisance*).

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.

The proposed Project will not result in any of the SCAQMD thresholds for criteria pollutants to be exceeded, based upon the results of the above air quality impact analyses. It is considered consistent with the 2007 AQMP, because the RAN TS/MRF operations will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or impairs the performance or efficiency of SCAQMD's programs to achieve the new federal attainment timeframes, as stated earlier.

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 and materials recovery facility 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 not located within any conservation area identified in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). In addition, the RAN TS/MRF is an existing facility, and there is no new construction that will occur as a result of the proposed Project, nor any disturbance to any native habitat.

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?

The Project is an established land use located within an existing industrial park and has been previously disturbed by the construction and operation of the existing facility. Surrounding properties are also previously developed. 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 project site is not located within a State-designated mineral resource area.

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

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?

Prior to development of the RAN TS/MRF, the project site was dry-farmed and was not known to contain any mineral resources. The RAN TS/MRF is an established land use, and the proposed Project does not involve any significant grading or soil excavation that will result in the loss of availability of locally-important mineral resources.

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 site is located immediately south of the Riverside Cement Company quarry and manufacturing facility. The Project is compatible with this adjacent land use and 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?

The project site does not physically consist of or connected to existing or abandoned quarries or mines; therefore, it will not expose people or property to mining hazards.

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)?

The proposed Project will not increase the total daily tonnage of the facility or the types of materials accepted. The facility is not permitted to accept hazardous materials except for those accepted as part of an ABOP program, those used in vehicle maintenance programs, and those removed from incoming waste loads. All hazardous materials used onsite or removed from incoming waste loads must be temporarily stored in a designated containment area and removed

from the site by a licensed hazardous waste hauler. The two above-ground diesel fuel tanks that are currently located in the concrete-paved greenwaste processing area provide diesel fuel to the stationary greenwaste processing equipment. If not managed properly, these tanks could present a fire or explosion hazard, as they are susceptible to collision accidents with the mobile equipment operating in the same area and fire accidents during equipment fueling and/or re-filling of the tanks themselves. With proper maintenance and operation procedures, the risk of upset associated with the diesel fuel tanks will be reduced to insignificance level.

MITIGATION MEASURE:

1. The greenwaste facility operator shall install and maintain properly sized and spaced concrete blocks on all sides of the above-ground fuel tanklocations to prevent collisions between mobile equipment and the tanks.

2. The greenwaste facility operator shall enforce a No-Smoking policy among employees working around the above-ground fuel tanks and maintain a sufficient buffer from combustibles.

3. The greenwaste facility operator shall install and maintain in proper operating conditions the following in the fuel tank locations:

    - A No Smoking sign
    - A Class B fire extinguisher
    - Fuel hose reels or racks
    - All wiring including, but not limited to ground cables
    - National Fire Protection Administration (NFPA) 704 sign

FINDING: Less Than Significant Impact After Mitigation

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

The proposed SWFP revision does not require the construction of additional buildings or facilities except for the future compost processing pad. The Project will not alter existing traffic patterns or increase facility traffic. Fire lanes around all buildings and outdoor processing areas are maintained to allow for emergency evacuation and emergency services access. Therefore, no impacts to emergency response plans or emergency evacuation plans are anticipated.

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

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

The soil amendment production area and greenwaste composting area are located outside and could result in the creation of potential nuisances such as odors, vectors, and windblown litter. The current SWFP and Transfer Processing Report provide mitigation programs designed to address these potential problems. These include implementation of the facility's litter and vector control programs. The proposed expansion in waste tire storage could increase the harborage for

certain vectors. To prevent rainwater from being accumulated within the storage trailers and thus mitigating for potential health impacts associated with vectors, the waste tire storage trailers must remain closed and their top covered or tarped between loading. In summary, the Project shall implement the following mitigation measures to minimize health nuisances and/or hazards:

MITIGATION MEASURES:

1 The transfer station operations shall comply with SCAQMD Rule 402 (Nuisance).

2 Extend the existing litter and vector control program to cover the proposed greenwaste composting operation and waste tire storage facility.

3 The waste tire storage trailers must remain closed and the tops covered or tarped between loading.

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 flammable vegetation. Fire safety systems including fire hydrants and fire extinguishers are located throughout the facility and provide adequate fire suppression capability for the Project. The potential fire hazard associated with the operation of the two above-ground diesel fuel tanks in the greenwaste processing area is reduced to an insignificant level with implementation of the mitigation measures noted in Section 3.2.9 a).

MITIGATION MEASURE:

1. Fire access lanes will be provided around compost and soil amendment piles to facilitate fire suppression operation in a composting fire accident.

FINDING: Less Than Significant Impact After Mitigation

3.2.10. Noise

a) Would the project result in increased noise levels?

The proposed SWFP revision includes the identification of storage areas for various recovered materials and the addition of compost activities to the facility. The Project is an established land use in a heavy industrial area. The project site is surrounded by similar uses that rely on trucking and heavy equipment operation.

Onsite uses include the transfer station/MRF buildings where waste and recyclable materials are processed and transferred within enclosed structures. Immediately west of the transfer station/MRF buildings is a waste collection hauling yard with heavy truck parking lots and a truck maintenance building. Other outdoor activities at the facility include an organics processing area where loads of greenwaste, wood waste, and construction/demolition wastes are received, processed and transferred. All activities except for active composting have been evaluated in the previous CEQA document, namely, Environmental Assessment No. 40362.

Soil amendment production and active composting will use feedstock materials that are already permitted for receipt at the facility. These activities will occur in the same area where organics are currently processed and use the same heavy equipment for material movement. Since no new heavy equipment or transfer trailers will be required to conduct these activities, there will be no significant increase in exterior noise levels above those currently experienced at the facility.

The facility uses established haul routes that contain a mix of commercial, industrial, and scattered residential land uses. The project site and surrounding properties have been or are being developed with industrial and manufacturing land uses, in accordance with the underlying Agua Mansa Industrial Corridor Specific Plan, which was approved by the Board of Supervisors in June 1986, along with corresponding EIR No. 216. The transition to industrial and noisier land uses was fully assessed in this EIR and the underlying EIR approved by the Board in 1994 for the development of the RAN TS/MRF, resulting in the Board making overriding findings. The project proponent will continue to comply with the measures identified and adopted through the underlying EIRs.

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

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

Noise generated by vehicles and equipment used in the daily operation of the facility may expose equipment operators and other personnel to severe noise levels. However, the Project will not involve increased equipment activities, and therefore, it will not result in workers exposed to higher than the current noise level, which was addressed in Environmental Assessment No. 40362. In addition, equipment operators at the facility are required to wear personal ear protection in accordance with Cal-OSHA (California Occupational Safety and Health Administration) and Riverside County Occupational Health requirements.

MITIGATION MEASURES:

1. All equipment used in the operation of the Robert A. Nelson Transfer Station/Materials Recovery 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.

2. Equipment operators and other facility personnel subject to excessive noise levels will be provided with hearing protection devices (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?

The proposed expansion does not require the construction of new buildings or facilities. The design of existing facilities have been reviewed and approved by the Riverside County Fire Department. An approved fire protection system is in place around all structures, and a sprinkler

system installed within each building. The existing fire protection system consists of several fire hydrants around the facility site and has a fire flow capacity that is capable of putting out a major fire in the greenwaste area and the waste tire storage trailers. Any small spontaneous fire that might occur within the green and wood waste piles can be quickly put out with the use of the on-site dozers/excavator. In conclusion, no additional impact to existing fire protection services is anticipated.

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

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

The proposed expansion does not require the construction of new buildings or facilities. Site security systems are currently in place throughout the site. Therefore, no impact to existing police services is anticipated.

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 proposed Project does not involve an increase in daily tonnage, daily traffic, or additional structures. The SWFP revision is limited to internal operational changes that do not affect government services.

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

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

The Project is not expected to have a significant effect upon, or result in a need for new or altered 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 will utilize the electrical power that currently serves the existing facility. No additional equipment requiring electrical power is proposed. In the event that the proposed

static pile composting is modified to employ the aerated static pile technology in the future, the additional power needs of the specific system will be assessed at that time.

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 provided at the project site. In addition, cellular telephone and two-way radios are used by facility personnel for onsite communications.

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 Project is located within an existing industrial park serviced with industrial-grade water treatment and distribution systems. 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?

Sanitary sewer service is currently available onsite. No additional sewer connections are proposed.

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 storm water drainage?

No new buildings or facilities are proposed under the Project. All required drainage facilities have previously been constructed as part of the current facility design and operation. The organics processing area and proposed active composting area have recently been graded to drain to a new storm drain inlet located near the southeast corner of the organics processing area. The new inlet has received an Encroachment Permit from the Riverside County Flood Control and Water Conservation District. This overall surface drainage pattern will not be significantly altered as a result of the anticipated paving/lining of the future composting area and installation of additional storm water treatment facilities for protection of surface water quality from possible contamination by compost leachate.

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

f) Would the project include new or retrofitted Stormwater Treatment Control BMP's (e.g. water quality treatment basin, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g., increase vector or odors)?

The Project will include greenwaste composting as a permitted facility activity. Current water quality regulations prohibit the release of liquids generated by composting into storm drains and surface waters and require containment and/or treatment of these liquids. Therefore, the Project will require paving/lining of the composting pad with an appropriate material that can prevent or minimize infiltration of liquids and collecting and treating compost leachate before discharge offsite. Moreover, additional drainage facilities may be required for collection and treatment of the compost leachate prior to discharge into the local storm drain system. Implementation of greenwaste composting at the facility will likely require revisions to the facility's current Industrial Storm Water Pollution Prevention Plan (SWPPP) and inclusion of new Best Management Practices (BMPs) to address compost leachate.

MITIGATION MEASURE:

1. Prior to commencement of active greenwaste compost operations, the facility's Industrial Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (AQMP) shall be amended to incorporate Best Management Practices (BMPs) designed to address potential surface water contamination from the compost activities, subject to approval by the Water Quality Control Board, Santa Ana Region.

FINDING: Less Than Significant Impact After Mitigation

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

The Project will serve to preserve landfill disposal capacity in Riverside County by removing recyclable materials, green and wood waste, and household hazardous waste from the waste stream, thus reducing the amount of waste to be landfilled and conserving valuable landfill capacity.

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

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

Domestic water and fire protection services are currently provided at the facility. No additional water services are required for the Project.

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?

The Scenic Highways section of the Riverside County General Plan indicates that there are no State-Designated or Eligible Highways in the vicinity. There is not a scenic vista to be affected by the Project.

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

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

The Project is located within an existing industrial park. It does not require additional buildings or facilities. Therefore, the proposed SWFP revision will not result in any impact to aesthetics.

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

c) Would the project create night lighting or glare?

The Project will not increase night lighting need. All site lighting currently exists and has been designed in accordance with the lighting requirements of Riverside County.

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 section of the Riverside County General Plan places the site in an area of low Paleontological Sensitivity. The Project will not require new buildings or facilities, or disturb previously undisturbed land. In addition, the Project is an established land use. Therefore, no impact to cultural resources is anticipated.

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

b) Would the project disturb archaeological resources?

The Relative Archaeological Sensitivity of Diverse Landscapes section of the Riverside County General Plan indicates the project site is not in an archaeological sensitive area. The Project will not require new buildings or facilities, or disturb previously undisturbed land. Therefore, no impact to archaeological resources is anticipated.

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

c) Would the project affect historical resources?

According to the Riverside County General Plan, the project site is not in an area of historical significance. The Project will not require new buildings or facilities, or disturb previously undisturbed land. Therefore, no impact to historical resources is anticipated.

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 require new buildings or facilities, or disturb previously undisturbed land. The development of the active compost facility will occur on lands previously disturbed. Therefore, no impact to religious or sacred uses is anticipated.

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 Project 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 involves an existing facility within an existing industrial park. Therefore, no impacts to existing recreational opportunities are anticipated.

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?

Greenhouse gas (GHG) emissions, whether they are from private developments or public projects, are an emerging regulatory concern in California in the wake of Governor's Executive Order S-3-05 (E.O. S-3-05) in 2005 and the subsequent passage of Assembly Bill No. 32 in 2006.[6] While major GHG generators are known and many of which well documented, 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 will sponsor a systematic GHG emissions field testing 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 from composting more challenging, impact significance thresholds for GHG emissions that are applicable to composting operations have not been established by any regulatory agencies. In this light, this EA will estimate the possible GHG emissions from composting greenwaste at RAN TS/MRF, based on emission factors derived from a recent composting field testing research conducted in Europe and GHG emissions

[6] E.O. S-3-05 targets statewide GHG emission reduction to the 2000 level by 2010, 1990 level by 2020, and 80% below the 1990 level by 2050. AB 32, or the Global Warming Solutions Act of 2006, sets the emission reduction goal of achieving the 1990 level by 2020.

from composting operation equipment on emission factors listed in Appendices G & I of Urbemis 2007, v.9.2. [7] These emission estimates are the net GHG emissions of the Project.

Composting GHG Emissions:

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.[8] 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. 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-equ), 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. Due to seasonal variations in greenwaste generation and market demands for soil amendment and compost products, the daily capacity of the greenwaste feedstock for each production cycle varies between the winter months and the rest of the year. Generally, during the winter months where greenwaste feedstock supply is higher and product demand lower, greenwaste processing at the transfer station shifts to the longer, 90-day production cycle. Conversely, the shorter, 21-day production cycle will prevail in rest of the year, when demand for soil amendments is generally higher. As shown in Table GHG -1, productions of soil amendment (21-day cycle) and finished compost (90-day cycle) are estimated to occur at 80 tpd and 175 tpd, respectively, for 90 days during Winter schedule and at

[7] Florian Amlinger, et al., *Green House Gas Emissions from Composting and Mechanical Biological Treatment*, Waste Management & Research, Vol. 26, No. 1, 47-60 (2008).

[8] 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.

266 tpd and 70 tpd, respectively, for 269 days during Spring, Summer, and Fall schedule. These daily feedstock throughput amounts are in accordance with the greenwaste processing tonnage breakdowns listed in Table A-4.

An emission factor of 40 kg CO2-equ/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-equ/MT treated materials estimated in the study by Florian Amlinger, et al. in Europe for the entire composting process for biowaste or greenwaste.[9] 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-equ/MT treated materials is used for the calculations here to represent an average or somewhat standard windrow composting conditions.

The calculations in Table GHG-1 show that the Project would generate approximately 0.00411 MMT of CO2-equ 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 days instead of a full composting cycle, on 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.[10] 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.

[9] 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-equ/MT greenwaste = kg CH_4/MT greenwaste x 21 + kg N_2O/MT greenwaste x 310).

[10] 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.

Table GHG-1
Robert A. Nelson Transfer Station/Materials Recovery Facility
Greenwaste Composting and 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 CO2-equ)	Cumulative Throughput Tonnage On-site
	A		B	C	D = A x B x C x 10^{-9}	A x B
Winter Operation Schedule*						
Soil Amendment	80 (72.576)	21	90	40	0.00026	7,200
Composting (Static Piles)	175 (158.759)	90	90	40	0.00057	15,750
Winter Total	**255 (231.334)**		**90**		**0.00083**	**22,950**
Spring, Summer, and Fall Operation Schedule*						
Soil Amendment	266 (241.314)	21	269	40	0.00260	71,554
Composting (Static Piles)	70 (63.504)	90	269	40	0.00068	18,830
Quarters Total	**336 (304.817)**		**269**		**0.00328**	**90,384**
Annual Total Biogenic GHG Emissions from Composting					**0.00411**	

Composting Equipment[3]	Unit	Total Use (hours/day) A	Max hp B[2]	Load Factor C[2]	Emissions Factor (g/hp/hour) D[2]	Equipment Emissions ($MMTCO_2$-equ/Year) [A x 359 days x B x C x D ÷ 454 g/lbs ÷ 2204.6 #/MT x 10^{-6} MT/MMT]
Loader	2	16	250	0.54	307.158	0.00024
Excavator	1	8	150	0.57	324.222	0.00008
Trommel Screen	2	12	175	0.59	335.598	0.00015
Grinder	1	6	1,000	0.78	443.672	0.00074
Annual Total Anthropogenic GHG Emissions from Composting Equipment						**0.00121**
Annual Gross Project GHG Emissions Related to Composting Operation						**0.00532**

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 = 907.19 Kg = 0.907 Mg (MT); 1 MT = 2,204.6 lbs

* See Table A-4 for the explanations for greenwaste processing/composting operation schedules

(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.

(2) CO_2 emission factors, load factors, and Max hp are based on Urbemis 2007, v.9.2, Appendices G & I. The parameters for Crusher and Other Material Handling Equipment were substituted for, respectively, the horizontal grinder and trommel screen.

(3) The composting equipment fleet is in accordance with the existing equipment allocation for the transfer station, as indicated in Table A-3.

Equipment GHG Emissions:

GHG emissions from equipment operation during the composting process represent the only anthropogenic GHG emissions of the Project, thus, the cause of the Project's potential climate change impact. The calculations are straight forward and illustrated in Table GHG-1. As indicated in the table, the composting equipment is estimated to produce an approximately 0.00121 MMT of CO_2-equ a year. This is equivalent to less than 0.0003% of the State's net GHG emissions at 480 $MMTCO_2E$ in 2004.[11]

If the biogenic GHG emissions (i.e., 0.00411 MMT of CO_2-equ a year) were considered also contributing to the current global warming and climate change, the net project impact-contributing GHG emissions would amount to approximately 0.00532 MMT of CO_2-equ a year, or approximately 0.0011% of the State's net GHG emissions at 480 $MMTCO_2E$ in 2004.

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 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.

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 0.0003% of the State-wide net GHG emissions in 2004.

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 all these factors are taken

[11] Staff Report, *California 1990 GHG Emissions Level and 2020 Emissions Limit*, approved by the CARB on December 6, 2007

into consideration, the proposed composting operation may not have a negative effect on climate change, or, perhaps, it may even 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 said goals of the Scoping Plan and CIWMB.

4. 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).

Notwithstanding the above conclusion of insignificant direct global warming effects of the Project, the proposed greenwaste composting operation 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 facts 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 cumulative 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[12]:

1. Maintain a proper carbon to nitrogen (C/N) ratio in the greenwaste feedstock that minimizes NH_3 and N_2O 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).

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

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

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

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).

FINDING: Less Than Significant Cumulative Impact After Mitigation

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 RAN TS/MRF 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 wastestream 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.

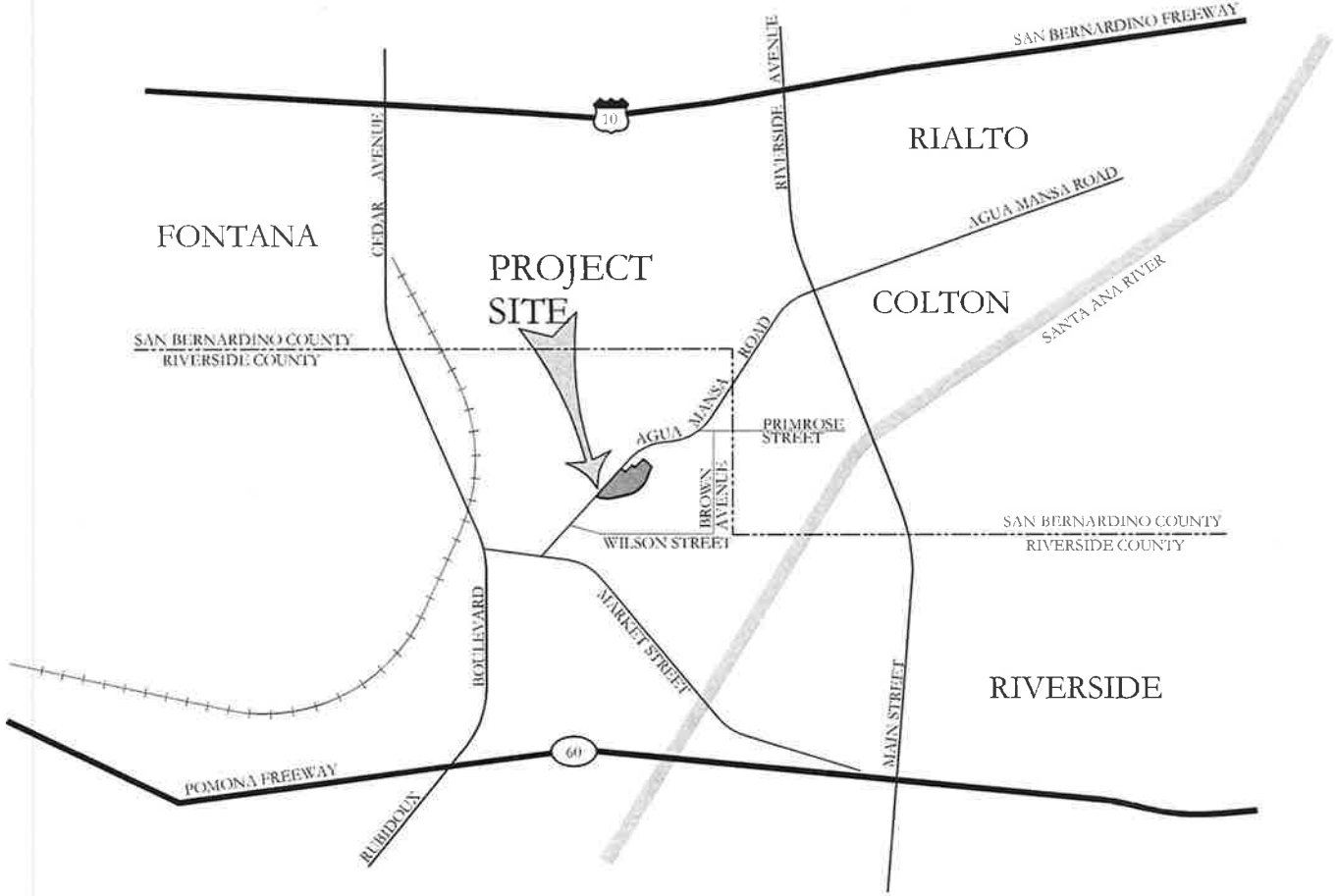
☒ The proposed Project could have a significant effect on the environment, unless the mitigation measures described in the Environmental Assessment are incorporated into the Project. A Mitigated Negative Declaration will be prepared.

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

Environmental Assessment Prepared By: Sung Key Ma, Planner IV

Environmental Assessment Completion Date: 10-6-2009

4.0 EXHIBITS



PROJECT: ROBERT A. NELSON TRANSFER STATION/MATERIALS RECOVERY FACILITY
1850 AGUA MANSA ROAD COUNTY OF RIVERSIDE, CALIFORNIA

FOR: ENVIRONMENTAL ASSESSMENT RAN 2009-03

EXHIBIT: 1

SUBJECT: SITE LOCATION MAP

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SCALE: NOT TO SCALE | DATE: SEPT 2009 | CHECKED BY: [illegible] | DRAWN BY: CDH | JOB #: [illegible]