



November 15, 2018

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

David Rader
Department of Planning and Development
County Government Center
70 West Hedding Street
San Jose, CA 95110

RE: NOP on Z-Best Composting Modifications

ALAMEDA COUNTY
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY
John Gioia
David Hudson
(Chair)
Karen Mitchoff
Mark Ross

MARIN COUNTY
Katie Rice
(Vice Chair)

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Rafael Mandelman
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY
David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY
Margaret Abe-Koga
Cindy Chavez
Liz Kniss
Rod G. Sinks
(Secretary)

SOLANO COUNTY
Pete Sanchez
James Sperring

SONOMA COUNTY
Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Mr. Rader,

Bay Area Air Quality Management District (Air District) staff has reviewed the notice of preparation (NOP) for a draft environmental impact report (DEIR) on the Z-Best Composting Facility Modifications (Project). This DEIR will examine the potential impacts from conversion of an existing composting operation using windrows-based composting methods to one using aerated static piles. The planned modification includes an increase in maximum daily throughput from 1,500 to 2,750 tons per day (tpd), an estimated doubling in truck trips per day, and a proposal to restrict truck trips to between 8pm to 4am. The Project will be required to obtain an authority to construct and a permit to operate from the Air District for its composting operation. We recommend that the project proponent initiate the permit application as soon as practicable.

While the NOP contains many details about the project, the project description does not identify some critical information about the project, such as (i) the parts of the existing facility that are being expanded and/or replaced, (ii) the materials being brought in for processing, and (iii) the anticipated products and their markets. Air District staff recommends that the project description in the DEIR include this information and the air quality analysis consider it within the impact discussion.

Air District staff recommends that the following information be provided in the DEIR:

- An evaluation of proximity of nearby receptors including schools, residential areas and businesses, and potential impacts of air pollutant emissions and odors.
- An estimate of construction-related emissions of particulate matter, ozone precursors (NOx/ROG), and greenhouse gases in pounds per day and tons per year.
- An estimate of daily and annual emissions of particulate matter, ozone precursors (NOx/ROG), and greenhouse gases in pounds per day and tons per year from all on-road and off-road mobile sources of emissions.

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- A cumulative emission estimate of all on-road and off-road mobile sources of emissions for particulate matter, ozone precursors (NOx/ROG), and greenhouse gases associated with the existing operations and the proposed Project.
 - An estimate of total vehicle miles traveled (VMT) by vehicle class. This VMT assessment should be based on where the material to be composted will be coming from and where the finished products will be transported once the composting is completed. This analysis should not be limited to just VMT in the Bay Area Air Basin (Air Basin). All vehicle miles traveled within or outside the Air Basin should be estimated and used in the emission estimate for on-road air quality impacts.
 - A project-alone and a cumulative health risk analysis to assess the potential health impacts associated with any increase in emissions at the facility on nearby sensitive receptors or sensitive receptors along State Route 25.
 - Identification of all emission sources at the existing facility by source name (including the permitted source number, where available). If the proposed aerated composting process retires and/or replaces current processes, the DEIR should be explicit about sources being retained and those being replaced.
 - An estimate of the potential air emissions associated with any new or modified transfer station (e.g., the tipping building), whether off-site or on-site.
 - An estimate of current actual air emissions, the current permitted air emissions, and the air emissions for the proposed project from both new or modified sources. If the proposed aerated composting process retires and/or replaces current processes, any associated emissions reductions associated with their retirement and replacement should be clearly detailed.
 - The emission factors used to estimate emissions, the emission calculation formulas, parameters, assumptions and bases (such as throughputs), particularly for emissions associated with the existing windrows and with the proposed aerated static piles. If any parameter and/or emission factor is different than from current source permitting (see Engineering Evaluation for 2017 Permit Application 28251), a detailed explanation and justification for the difference should be provided. If the project will include emissions testing, please describe the testing method and protocol that will be used.
 - All emission estimates should be clearly associated with its source name and permitted source number. Throughput for each emission source should detail feedstock material type and rate. The DEIR should clearly describe any Best Available Control Technology emissions controls included in the project. If biofilters will be used, please supply information about their design and maintenance schedule.
 - Details about the handling and storing of feedstock, product, and byproduct materials, such as pile design characteristics (e.g., height and length, among others) and pile management methods (e.g., limits on residence time, pile tagging, etc).
 - An assessment of available land and alternative configurations that can buffer management of feedstock piles and of product and/or byproduct piles against shocks in inflows and outflows. The goal should be to prevent disruptions to best practices in material handling and storage.
 - The impact of the proposed material delivery schedule between 8pm and 4am on the storage of materials, either on-site or off-site, given that organic materials may be collected by scavengers outside the hours of 8pm to 4am.
 - Operational changes that may occur due to the planned expansion from 1,500 to 2,750 tpd, with a focus on how the expansion will impact permitted operations. The current air permit limits operation to

this facility to 10 hours per calendar day and 56 hours per calendar week, and we encourage the EIR to reconcile these limits with the proposal for delivery between 8pm-4 am.

Air District staff is available to assist the County in addressing these comments, and we recommend that the County and its consultants meet with Air District staff to discuss them. For such discussion or for assistance with any questions that arise, please contact Chad White, Senior Environmental Planner, at 415-749-8619 or cwhite@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Margaret Abe-Koga
BAAQMD Director Cindy Chavez
BAAQMD Director Liz Kniss
BAAQMD Director Rod Sinks