



San Diego County Air Pollution Control District

February 25, 2022

Robert Hingtgen
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Hingtgen,

The San Diego Air Pollution Control District (District) appreciates the opportunity to provide comments on the proposed project. General comments contained in this letter are for information/education of District rules and requirements and do not require a response. The District requests a response when specific comments are made that reference a section of the CEQA document.

Project Description as Described by the District

The Cottonwood Sand Mine Project (project) is located in the unincorporated portion of the County, in the Valle De Oro Community Planning Area. The Project proposes to convert the two golf courses within the Cottonwood Golf Club to a sand mining operation that would be conducted in three phases over 10 years. Approximately 214.4 acres of the approximately 280-acre site are proposed for extractive use.

General Information About the District

The District is mandated under federal and state law to regulate air pollutant emissions and improve air quality to protect public health and the environment. Accordingly, the District operates a countywide air quality permitting, monitoring, and enforcement programs to ensure compliance with applicable air pollution regulations for healthful air quality. The District's jurisdiction covers all of San Diego County, including both the incorporated and unincorporated areas.

Specific Comments on Emissions Estimates

The District reviewed emissions for Diesel Particulate Matter (DPM) and Particulate Matter (PM) by comparing the project details and assumptions used to create the CalEEMod output. These comments pertain to DPM, PM and other emissions stated in the DRAFT EIR:

- The emissions found on the Attachment tables and those found in the AQ section are not consistent, as some of the totals are different. The District suggests comparing these emissions and making them consistent.

- The DRAFT EIR used District calculation procedures for the operational emissions, except for the unpaved haul roads – for those, the EIR used the 2006 version of AP-42 (The District uses the 1995 version due to the need to make moisture and other adjustments). Using the 2006 version of AP-42 tends to underestimate the haul road emissions by 2 to 3.5 times.
- The DRAFT EIR used a 95% control efficiency for watering the haul roads, but did not specify a watering frequency in the dust control plan. The District suggests adding a watering frequency that correlates to 95% (i.e. watering every 2 hours, unless the ground is wet).
- PM emissions are created using OFFROAD2017, although EMFAC 2021 was released in January 2021. The District does not believe recalculation of the emissions estimations is required, but including a discussion of why using OFFROAD2017 is still accurate would be appropriate.

Specific Comments on the Health Risk Assessment

The District also reviewed the health risk analysis conducted in the DRAFT EIR. Comments on the health risks:

- The risk calculations are based on a 10-year exposure, as the operation is assumed to run for 10 years only. This is not the practice used by the District in calculating health risks and will be inconsistent with the assumptions used in calculating health risks in District Rule 1200 HRA guidelines. This has the biggest impact on risk results compared to what is seen in AB2588 HRAs (which use 30 years, assuming the source will continue in the future). Based on the reported risk methodology in the DRAFT EIR, it is recommended that the HRA be adjusted to be more consistent with how the District calculates health risks as a result of facility emissions. Then the results can be compared to District Rule 1200 thresholds (again mainly due to the 10-year exposure instead of a normal 30-year exposure). It is also not the District's practice, nor does the District have authority, to put a sunset date on a permit indicating when the operation of a facility must end.
- The DRAFT EIR used CARB provided meteorological data for Gillespie Field. The District would have recommended the use of more recent data which the District has access to. Also, the District would have recommended to use the sigma theta data (not the modified Ustar that was previously used). However, this should not impact the resulting risk results.
- The DRAFT EIR did not give all the HARP model inputs (like deposition velocity), so the District is unable to verify all model inputs. However, the emissions input by source looks appropriate, and the cancer risk isopleth provided is what we would expect for the dispersion patterns in the area.

General Information About Equipment Potentially Requiring Permits

The District's permitting program has been established to minimize air pollution by specifying operating and compliance requirements for stationary and portable sources that emit air contaminants. District [Rule 10](#) requires that any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, shall first obtain written authorization for such construction from the District. Examples of air contaminants include carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, sulfur dioxide or toxic air contaminants, which can negatively impact public health. District [Rule 11](#) lists exemptions for equipment or processes that do not emit a significant amounts of air pollutants.

Specific Comment on Equipment Which May be Used

Rock crushing, blasting and some 2-engine vehicles may require authority to operate from the District.

General Information About Dust

Projects or operation that can generate fugitive dust emissions may be subject to the following APCD rules:

- APCD [Rule 50](#) *Visible Emissions*, which states air contaminants shall not be discharged into the atmosphere for a period or periods aggregating more than three minutes in any period of 60 consecutive minutes which is darker in shade than a number 1 on the Ringlemann Chart (20% opacity).
- APCD [Rule 51](#), *Nuisance*, which states *“a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals.”*

Please note the District has received complaints in the past in regard to sand, rock and aggregate operations when in proximity to residences. Common factors which contribute to these complaints are proximity and elevation of a project in relation to residences, wind patterns, air pollution controls or mitigations implemented and moisture content of haul roads and aggregate processing lines and piles.

In addition to the rules listed above, any commercial construction or demolition activity capable of generating fugitive dust emissions may be subject to District [Rule 55](#), *Fugitive Dust Control*. This rule has restrictions for airborne dust beyond the property line and visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out.

General Information About Off-Road Construction Equipment

Any project using off-road vehicles that are diesel-powered, self-propelled, and 25 horsepower or greater must be registered under the current owner with the California Air Resources Board (CARB) Diesel Off-Road Online Reporting System (DOORS). Each vehicle is assigned an Equipment Identification Number (EIN) which must be labeled on both sides of the vehicle. Fleets must meet emission targets.

Fleets must limit their unnecessary idling to 5 minutes; there are exceptions for vehicles that need to idle to perform work (such as a crane providing hydraulic power to the boom), vehicles being serviced, or in a queue waiting for work.

Written Idling Policy – Medium fleets (total max hp 2,501 – 5,000) and large fleets (total max hp greater than 5,000 hp) must also have a written idling policy that is made available to operators of the vehicles and informs them that idling is limited to 5 consecutive minutes or less.

General Information About Asbestos

Asbestos is a known human carcinogen and the primary route of exposure is through inhalation of asbestos fibers. More information on the health effects of asbestos may be found at www.epa.gov/asbestos . As such, APCD [Rule 1206](#) incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants (NESHAP) and includes additional requirements to minimize exposure to asbestos fibers.

APCD [Rule 1206](#) requires a facility survey for certain projects to determine if asbestos is present prior to commencement of renovation or demolition. Persons conducting facility surveys shall have taken and passed a current EPA-approved Building Inspector Course. The asbestos content shall be analyzed by a laboratory certified by the National Voluntary Laboratory Accreditation Program (NVLAP).

If more than 100 square feet of asbestos containing materials will be disturbed or a demolition will occur a notification must be submitted to the APCD and procedures for asbestos emission control and waste handling and disposal must be in compliance with District Rule 1206.

Specific Comment About Asbestos

The DRAFT EIR specifies the removal of all manmade structures. As stated in the general information about asbestos, "If more than 100 square feet of asbestos containing materials will be disturbed or a demolition will occur a notification must be submitted to the APCD and procedures for asbestos emission control and waste handling and disposal must be in compliance with District Rule 1206."

Should you have any questions about these comments or District requirements please contact Air Quality Specialist, Eric Luther (858) 586-2806 or eric.luther@sdapcd.org .

Sincerely,



Eric Luther
Air Quality Specialist