

**San Joaquin Valley Unified  
Air Pollution Control District**

**Western Milling, LLC**

**Project Number C-1083613**

**Final Mitigated Negative Declaration**

**June 2009**

**SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT GOVERNING BOARD  
2009**

CHAIR: CHRIS VIERRA  
Councilmember, City of Ceres

VICE CHAIR: TONY BARBA  
Supervisor, Kings County

**MEMBERS:**

JUDITH G. CASE  
Supervisor, Fresno County

RONN DOMINICI  
Supervisor, Madera County

HENRY JAY FORMAN, PH.D  
Appointed by Governor

MICHAEL G. NELSON  
Supervisor, Merced County

WILLIAM O'BRIEN  
Supervisor, Stanislaus County

LEROY ORNELLAS  
Supervisor, San Joaquin County

JOHN G. TELLES, M.D.  
Appointed by the Governor

RAYMOND A. WATSON  
Supervisor, Kern County

J. STEVEN WORTHLEY  
Supervisor, Tulare County

***AIR POLLUTION CONTROL OFFICER***

SEYED SADREDIN

# FINAL MITIGATED NEGATIVE DECLARATION

## **Western Milling, LLC**

June 2009

Lead Agency: San Joaquin Valley Air Pollution Control District  
1990 East Gettysburg Avenue  
Fresno CA 93726-0244

Agency Contact: David McDonough, Air Quality Specialist  
Phone: (559) 230-6000  
Fax: (559) 230-6061

Project Sponsor Western Milling, LLC  
And Location: Hanford Industrial Park  
SE 1/4 Sec. 12, T19S, R21E

Project Contact: Doug Shaffer  
Phone: (661) 282-2200  
Fax: (661) 282-2204



## A. INTRODUCTION

The San Joaquin Valley Unified Air Pollution Control District (District) has received an Authority to Construct (ATC) application from Western Milling, LLC proposing the installation of a new dry poultry litter (DPL). The proposed operation will include receiving and shipping operations, storage operations, mixing operations, grinding operations with spray bars, sterilizing auger with an existing permit exempt 1.75 MMBtu/hr natural gas-fired heater, and transfer conveyors. The District has performed an Engineering Evaluation (EE) (C-1083613) incorporated herein by reference, and has conducted an Initial Study. The District concludes that with mitigation there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment. The District has prepared a Final Mitigated Negative Declaration for public review and comment.

## B. PURPOSE AND AUTHORITY

The District has discretionary approval power over the project via its Permits Required Rule (Rule 2010) and New and Modified Stationary Source Review Rule (Rule 2201). The District has determined that no other public agency has broader authority for approving the project. Because the District is the public agency acting first on the project, the District shall serve as Lead Agency (CEQA Guideline 15051.c)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The ERG was prepared to comply with this requirement and is an internal document used to comply with CEQA.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Under CEQA the Lead Agency is required to:

- Conduct preliminary reviews to determine if applications are subject to CEQA [CCR §15060].



- Conduct review to determine if projects are exempt from CEQA [CCR §15061].
- Prepare Initial Studies for projects that may have adverse environmental impacts [CCR §15063].
- Determine the significance of the environmental effects caused by the project [CCR §15064].
- Prepare Negative Declarations or Mitigated Negative Declarations for projects with no significant environmental impacts [CCR §15070].
- Prepare, or contract to prepare, EIRs for projects with significant environmental impacts [CCR §15081].
- Adopt reporting or monitoring programs for the changes made to projects or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment [PRC §21081.6 & CCR §15097].
- Comply with CEQA noticing and filing requirements.

## C. PROJECT BACKGROUND INFORMATION

### Project Description

Western Milling, LLC is proposing the installation of a new dry poultry litter (DPL). The proposed operation will include receiving and shipping operations, storage operations, mixing operations, grinding operations with spray bars, sterilizing auger with an existing permit exempt 1.75 MMBtu/hr natural gas-fired heater, and transfer conveyors. Western Milling is proposing a two step process consisting of poultry litter processing and feed additive processing. The facility expects up to 1,000 tons per day of raw poultry litter will be received from local poultry ranches by belt trailer, side dump truck, or end dump truck. The received poultry litter will be stored on the ground in piles. The poultry litter is sterilized by transfer through an enclosed 18" by 72' heated auger and used to produce cattle feed. Heating of the poultry litter is accomplished through the use of closed indirect heat transfer system. Hot air is blown through heating ducts attached to the auger, thereby heating the auger to a specified temperature without the air actually contacting the product. As the material passes through the heated augers a pasteurization process takes place, sterilizing the material to produce a safe feed product. The DPL will be stored inside a building as a pile and shipped within 48 hours of sterilization. Urea and ground feed additives are introduced before discharge from the sterilization auger. The finished product is not stockpiled.

The facility expects up to 500 tons/day of feed additives received and transferred to hoppers, bins, or tanks. A small, purpose-built tub grinder with four counter-rotating blades (hammermill), equipped with a water spray bar for dust suppression, is proposed for a grinding operation. The counter-rotating blades chop the feed additives into a consistent size for addition into the DPL process or for bulk sale. These feed additives are of the consistency of ground corn meal, and are maintained with about 15% moisture content.



The bulk density of the material is 34 pounds per cubic foot. Ground product will be stored within the existing warehouse.

DPL is stockpiled or loaded directly into bulk feed trucks or dairy wagons for shipment. All materials received will be processed within 30 days. Therefore composting is not expected to occur. The facility has stated that composting is detrimental to the quality of the product as the protein content is reduced.

Please note that no composting is proposed. Additionally, not enough information was available to quantify Volatile Organic Compounds (VOCs) emissions which may occur during the pasteurization step and therefore these emissions are unknown but expected to be minimal.

#### Pre and Post Project Emissions

Pollutant	Post-Project Emissions (lb/year)	Pre-Project Emissions (lb/year)	Change in Emissions (lb/year)	Change in Emission (tons/year)
NO <sub>x</sub>	0	0	0	0
SO <sub>x</sub>	0	0	0	0
PM <sub>10</sub>	7,523	0	7,523	3.76
CO	0	0	0	0
VOC	0	0	0	0
NH <sub>3</sub>	0	0	0	0

Particulate matter less than 10 microns in aerodynamic diameter (PM<sub>10</sub>) is the only pollutant of concern emitted from the poultry litter receiving, storage, sterilization, and load out operation. PM<sub>10</sub> emissions during storage are controlled by maintaining raw poultry litter with a moisture content of approximately 15%. During processing, the poultry litter is transferred through enclosed augers. Transfer points will be controlled with water spray bars. The finished product, dried poultry litter will be stored within an enclosed warehouse. The District does not have enough information to assess whether facility odors and potential VOCs emissions may create a nuisance. Odor and VOC monitoring will be done by the Compliance Division inspector during the startup inspection.

#### Proposed Mitigation:

No odor or VOC control has been proposed. The following condition is included on the ATC to ensure that odors do not create a nuisance:

If odors create a nuisance beyond the facility boundary permittee shall obtain an Authority to Construct and install an odor control system. [District Rule 4102]



### Project Location

The proposed operation will be located at the Kings Industrial Park, within the SE 1/4 Sec. 12, T19S, R21E.

### General Plan Designation and Zoning

Western Milling will occupy approximately a 55-acre portion of the Kings Industrial Park, located south of the city of Hanford, CA. The facility proposes the installation of a new dry poultry litter (DPL). The project site is zoned Heavy Industrial. The assessor's parcel numbers (APNs) for this site are 018-232-072, 018-232-022 and -018-232-054.

The District has verified that the proposed project is not within 1,000 feet of the outer boundary of any schools. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to the Project.

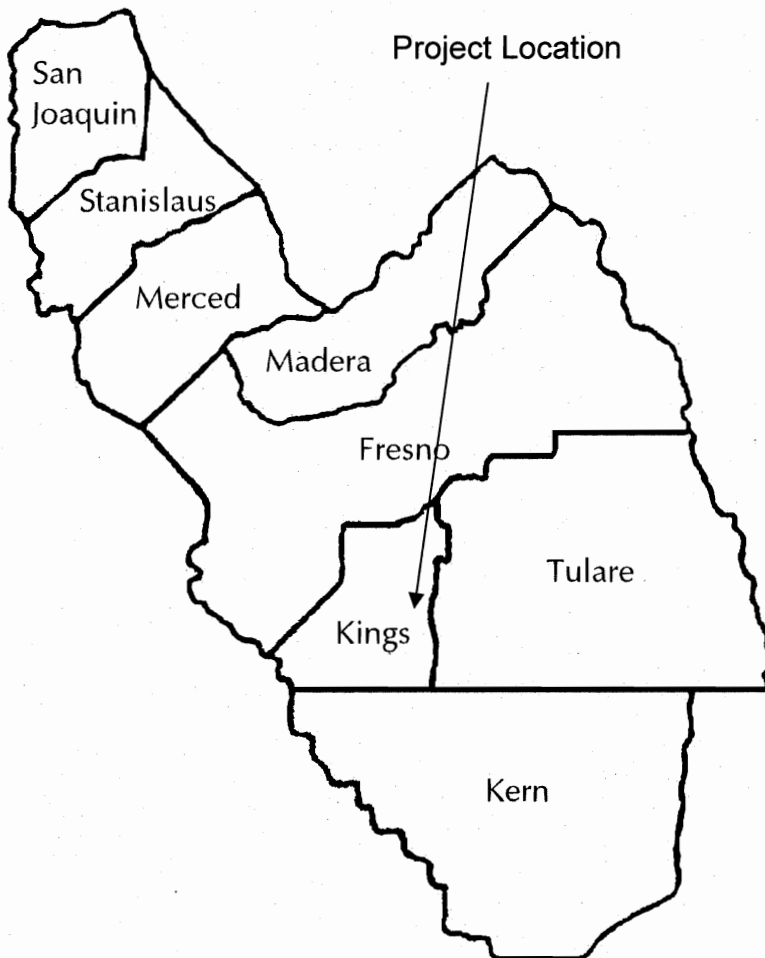
### Surrounding Land Uses and Setting

The area North and East of the project site is currently used as agriculture (field crops, row crops and orchards). The area West of the project site is the railroad and the City of Hanford wastewater treatment facility. The Area South of the project site is used for agriculture and heavy industrial businesses.



**Figure 1**

**Regional Location within the SJVAB**







#### **D. DECISION TO PREPARE A MITIGATED NEGATIVE DECLARATION**

The District has performed an Engineering Evaluation (EE) (C-1083613) incorporated herein by reference, and has conducted an Initial Study. The District concludes that with mitigation there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment. The District has prepared a Final Mitigated Negative Declaration for public review.



**E. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated", as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture Resources              | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Geology/Soils          |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality            | <input type="checkbox"/> Land Use/Planning      |
| <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Noise                              | <input type="checkbox"/> Population/Housing     |
| <input type="checkbox"/> Public Services               | <input type="checkbox"/> Recreation                         | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems     | <input type="checkbox"/> Mandatory Findings of Significance |   |

**F. DETERMINATION**

I certify that the project was independently reviewed and analyzed and that this document reflects the independent judgment of the District.

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION has been prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Signature: 

Date: 6/17/09

Printed name: Rick McVaigh

Title: Deputy APCO



**G. ENVIRONMENTAL IMPACT CHECKLIST**

<b>I. AESTHETICS</b> Would the proposal:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Affect a scenic vista or scenic highway?				X
b) Have a demonstrable negative aesthetic effect?				X
c) Create light or glare?				X
<b>Discussion:</b> The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through c), as identified above.				
<b>Mitigation:</b> None required.				
<b>Reference:</b> Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty				
<b>II. AGRICULTURE RESOURCES</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				X
<b>Discussion:</b> The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through c), as identified above.				
<b>Mitigation:</b> None required.				
<b>Reference:</b> : Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty				



<b>III. AIR QUALITY</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?		X		
<p><b>Discussion:</b> Sensitivity to odors is largely subjective and the District does not have enough information to assess whether facility odors and potential VOC emissions may create a nuisance. To mitigate potential odor impacts, odor and VOC monitoring will be done by the Districts Compliance Division inspector during the startup inspection. In addition, the District has imposed permit conditions requiring the applicant to obtain an Authority to Construct and install an odor control system, should nuisance odors be detected outside project boundaries. Thus, the project would not have an impact on environmental elements (a through e), as identified above. The District has evaluated project related impacts on global climatic change and finds them to less than significant. See Appendix A for a discussion of project related greenhouse gas emissions.</p>				
<p><b>Mitigation:</b> The District has imposed permit conditions requiring the applicant to obtain an Authority to Construct and install an odor control system, should nuisance odors be detected outside project boundaries. No further mitigation is necessary</p>				
<p><b>Reference:</b> : Engineering Evaluation C-1083613</p>				
<b>IV. BIOLOGICAL RESOURCES</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X



c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
<b>IV. BIOLOGICAL RESOURCES</b> (Continued):	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

**Discussion:** The proposed project would be located in an existing Industrial Park. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through f), as identified above.

**Mitigation:** None required.

**Reference:** Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty

<b>V. CULTURAL RESOURCES</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
d) Disturb any human remains, including those interred outside of formal cemeteries?				X

**Discussion:** The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through d), as identified above.

**Mitigation:** None required.

**Reference:** Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty



<b>VI. GEOLOGY/SOILS</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
<b>Discussion:</b> The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through e), as identified above.				
<b>Mitigation:</b> None required.				
<b>Reference:</b> Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty				

<b>VII. HAZARDS &amp; HAZARDOUS MATERIALS</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or				X



proposed school?				
<b>VII. HAZARDS &amp; HAZARDOUS MATERIALS</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

**Discussion:** The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through h), as identified above.

**Mitigation:** None required.

**Reference:** Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty

<b>VIII. HYDROLOGY/WATER QUALITY</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Violate any water quality standards or waste discharge requirements?				X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?				X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of				X



the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				
<b>VIII. HYDROLOGY/WATER QUALITY</b> (Continued)	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?				X
f) Otherwise substantially degrade water quality?				X
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
j) Inundation by seiche, tsunami, or mudflow				X
<b>Discussion:</b> The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. The facility is not subject to DWRs or any specific State Water Resources Control Board conditions or requirements. Thus, the project would not have an impact on environmental elements (a through j), as identified above.				
<b>Mitigation:</b> None required.				
<b>Reference:</b> Engineering Evaluation C-1083613 Email from consultant Doug Shaffer				
<b>IX. LAND USE/PLANNING</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X





**Discussion:** The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through c), as identified above.

**Mitigation:** None required.  
**Reference:** Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty

<b>X. MINERAL RESOURCES</b> Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
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?				X

**Discussion:** There are no known significant mineral resources in or around the project area. The project would be sited on land within the Kings Industrial Park. Thus, the project would not have an impact on environmental elements (a through b), as identified above.

**Mitigation:** None required.  
**Reference:** Engineering Evaluation C-1083613

<b>XI. NOISE</b> Would the project result in:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X



**Discussion:** The proposed project will be built within the Kings Industrial Park. On-site grading and construction resulting from this project may result in a temporary increase in the area's ambient noise levels. The project's impact on noise associated with on-site activities and traffic are not anticipated to exceed normally acceptable noise levels. Thus, the project would have a less than significant impact on environmental element (d) and would not have an impact on environmental elements (a,b,c,e and f), as identified above.

**Mitigation:** None required.

**Reference:** Engineering Evaluation C-1083613 & email from consultant Doug Shaffer

<b>XII. POPULATION/HOUSING</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				<b>X</b>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				<b>X</b>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				<b>X</b>

**Discussion:** The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through c), as identified above.

**Mitigation:** None required.

**Reference:** Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty

<b>XIII. PUBLIC SERVICES</b> Would the project	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?				<b>X</b>
Police protection?				<b>X</b>
Schools?				<b>X</b>
Parks?				<b>X</b>
Other public facilities?				<b>X</b>
b) Cumulatively exceed official regional or local population projections?				<b>X</b>



<b>XIII. PUBLIC SERVICES</b> (Continued)	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
c) Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?				X
d) Displace existing housing, especially affordable housing?				X
<b>Discussion:</b> The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a through d), as identified above.				
<b>Mitigation:</b> None required.				
<b>Reference:</b> Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty				
<b>XIV. RECREATION</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
<b>Discussion:</b> The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a and b), as identified above.				
<b>Mitigation:</b> None required.				
<b>Reference:</b> Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty				
<b>XV. TRANSPORTATION/TRAFFIC</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			X	
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				X



XV. TRANSPORTATION/TRAFFIC (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?				X
f) Result in inadequate parking capacity?				X
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

**Discussion:** Western Milling, LLC proposes the installation of a new dry poultry litter (DPL). The applicant proposes a total of 40 heavy-duty trucks per day traveling 100 miles round trip. Using EmFac 2007 for Kings County to estimate the truck traffic emissions for the Western Milling Poultry Litter operation, it was found that the project is below the District's significance threshold shown in table A. Since the project would be located in the existing Kings Industrial Park the increase in the number of trucks from the facility is not expected to deteriorate the roads beyond the current usage. Thus, the project would have a less than significant impact on environmental element (a) and would not have an impact on environmental elements (b through g), as identified above.

**Mitigation:** None required.

**Reference:** Email from consultant Doug Shaffer Post project emissions are presented below in Table A;

<b>Table A TOTAL PROJECT EMISSIONS – INCRIMENTAL INCREASE</b>						
Emissions Source	Pollutant (tons/year)					
	ROG	NO <sub>x</sub>	CO <sup>c</sup>	SO <sub>x</sub> <sup>c</sup>	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>c</sup>
<b>Unmitigated Emissions</b>						
• Operational (Vehicle) Emissions <sup>a</sup>	0.22	7.13	2.17	0.02	0.30	0.30
• 1.75 MM Btu/hr Process Heater Emissions	0.02	0.28	0.28	0.02	0.04	0.04
Total Unmitigated Long-Term Emissions <sup>b</sup>	0.24	7.41	2.45	0.04	0.34	0.34
<b>SJVAPCD and Kern County CEQA Threshold</b>	<b>10</b>	<b>10</b>	<b>NA</b>	<b>NA</b>	<b>15</b>	<b>NA</b>
Is Threshold Exceeded <i>Before</i> Mitigation?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**NOTES:**

<sup>a</sup> Operational Emissions are based on estimated truck traffic to and from the project site including product distribution, number of vehicles, vehicle type, and expected round trip distances for each commodity.

<sup>b</sup> Total Long-Term Emissions includes all operational, area, and mobile source emissions associated with the proposed facility that will occur within the air basin.

<sup>c</sup> The SJVAPCD has not established significance thresholds for CO, SO<sub>x</sub> or PM<sub>2.5</sub>.



<b>XVI. UTILITIES/SERVICE SYSTEMS</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X
<b>Discussion:</b> The proposed project would be located in the existing Kings Industrial Park and is in concert with the approved land usage. The approval of the existing industrial park was subject to CEQA review in 1/28/1975, which included an assessment of these properties built out for industrial uses. There is no evidence to suggest this project would result in impacts not previously considered to be less than significant. Thus, the project would not have an impact on environmental elements (a and g), as identified above.				
<b>Mitigation:</b> None required.				
<b>Reference:</b> Engineering Evaluation C-1083613 & phone call with the City of Hanford Barbra Marty				



<b>XVII. MANDATORY FINDINGS OF SIGNIFICANCE</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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>X</b>	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively Considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			<b>X</b>	
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?			<b>X</b>	
<b>Discussion:</b> Review of this project has not identified any features, which might significantly impact the environmental quality of the site and/or adjacent areas. The applicant has incorporated design elements into the project that reduce the project's environmental impacts to less than significant.				



## Appendix A – Greenhouse Gases

### Greenhouse Gas Emissions

Federal and state laws require emission control measures in areas where air pollution exceeds ambient air quality standards. The San Joaquin Valley is one of these areas. The District consists of the following eight counties: San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare, and the Valley portion of Kern. The District's primary focus is taking action to improve the health and quality of life of people living in the Valley, while striving to meet health based state and federal ambient air quality standards. This is achieved through adopting and implementing cost-effective air pollution control measures, providing meaningful incentives for reducing emissions, and by developing creative alternatives for achieving emissions reductions. The District's strategies focus on reducing Criteria Pollutants to meet federal and state standards, and regulating stationary source emissions.

Recent concerns over global warming have created a greater interest in greenhouse gas emissions (GHG) and their contribution to global climate change (GCC). However, at this time there are no generally accepted thresholds of significance for determining the impact of GHG emissions from an individual project on GCC. Thus, permitting agencies are in the position of developing policy and guidance to ascertain and mitigate to the extent feasible the effects of GHG, for CEQA purposes, without the normal degree of accepted guidance and case law.

**Greenhouse Gases.** Gases that trap heat in the atmosphere are called greenhouse gases. They act in the atmosphere in a manner analogous to the way a greenhouse retains heat. Common GHG include water vapor, carbon dioxide, methane, nitrous oxides, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, ozone, and aerosols. Without the natural heat trapping effect of GHG, the earth's surface would be about 34 degrees Centigrade cooler (Climate Action Team, 2006). Natural processes and human activities are primarily responsible for the emission of GHG. Green house gases include:

Water Vapor: Although not considered a pollutant, water vapor is the most important, abundant, and variable GHG. In the atmosphere, it maintains a climate necessary for life. The main source of water vapor is evaporation from the ocean (approximately 85 percent). Other sources include sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves.

Ozone: Unlike other GHG, ozone is relatively short-lived and, therefore, is not global in nature. It is difficult to make an accurate determination of the contribution of ozone precursors (nitrogen oxides and volatile organic compounds) to global climate change (California Air Resources Board (CARB) 2004b).





Aerosols: Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols. Sulfate aerosols are emitted when fuel-containing sulfur is burned. Black carbon (or soot) is emitted during bio mass burning or incomplete combustion of fossil fuels. Particulate matter regulation has been lowering aerosol concentrations in the United States; however, global concentrations are likely increasing.

Carbon dioxide: Carbon dioxide (CO<sub>2</sub>) is an odorless, colorless gas, which has both natural and anthropogenic sources. Natural sources include the following: respiration of bacteria, plants, animals, and fungus, evaporation from oceans, volcanic outgassing, and decomposition of dead organic matter. Anthropogenic sources of carbon dioxide are from burning coal, oil, natural gas, and wood. Concentrations of CO<sub>2</sub> were 379 parts per million (ppm) in 2005, which is an increase of 1.4 ppm per year since 1960 (Intergovernmental Panel on Climate Change 2007).

Methane: Methane (CH<sub>4</sub>) is a flammable gas and is the main component of natural gas. When one molecule of CH<sub>4</sub> is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. There are no ill health effects from CH<sub>4</sub>. A natural source of CH<sub>4</sub> is from the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH<sub>4</sub>, which is extracted for fuel. Other sources are from cattle, fermentation of manure, and landfills.

Nitrous oxide: Nitrous oxide (N<sub>2</sub>O), also known as laughing gas, is a colorless greenhouse gas. Higher concentrations of N<sub>2</sub>O can cause euphoria, dizziness, and slight hallucinations. N<sub>2</sub>O is produced by microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (nitric acid production, nylon production, fossil fuel-fired power plants, and vehicle emissions) also contribute to its atmospheric load. It is used in racecars, rocket engines, and as an aerosol spray propellant.

Chlorofluorocarbons: Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH<sub>4</sub> or ethane with chlorine and/or fluorine atoms. CFCs are nonflammable, nontoxic, insoluble, and chemically uncreative in the troposphere (the level of air at the earth's surface). CFCs were first synthesized in 1928 for use as cleaning solvents, refrigerants, and aerosol propellants. They destroy stratospheric ozone; therefore, their production was stopped as required by the Montreal Protocol in 1987.

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are synthetic man-made chemicals that are used as a substitute for CFCs for automobile air conditioners and refrigerants.

Perfluorocarbons: Perfluorocarbons (PFCs) have stable molecular structures and do not break down though the chemical processes in the lower atmosphere. High-energy





ultraviolet rays, roughly 60 kilometers above the earth's surface are able to destroy the compounds. PFCs have long lifetimes, ranging between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. Concentrations of tetrafluoromethane in the atmosphere are over 70 parts per trillion (ppt) (Environmental Protection Agency (EPA) 2006d). The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur hexafluoride: Sulfur hexafluoride (SF<sub>6</sub>) is an inorganic, colorless, odorless, nontoxic, nonflammable gas. Concentrations in the 1990s were roughly 4 ppt (EPA 2006d). SF<sub>6</sub> is used for insulation in electric power transmission and distribution equipment, in semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.

**Worldwide Greenhouse Gas Inventory.** In 2004, total worldwide GHG emissions were estimated to be 20,135 teragram CO<sub>2</sub> equivalents (Tg CO<sub>2</sub> Eq.) (22,194,810,000 tons), excluding emissions/removals from land use, land use change, and forestry (United Nations Framework Convention on Climate Change 2006). (Note that sinks, or GHG removal processes, play an important role in the GHG inventory as forest and other land uses absorb carbon.) In 2004, U.S. GHG emissions were 7,074.4 Tg CO<sub>2</sub> Eq. (7,798,111,120 tons) (EPA 2006a). In 2005, total U.S. GHG emissions were 7,260.4 Tg CO<sub>2</sub> Eq. (8,003,138,920 tons), a 16.3 percent increase from 1990 emissions, while U.S. gross domestic product increased by 55 percent over the same period (EPA 2007a). Emissions rose from 2004 to 2005, an increase of 0.8 percent. Factors causing the increase are the following: (1) strong economic growth in 2005, leading to increased demand for electricity and (2) an increase in the demand for electricity due to warmer summer conditions (EPA 2007a). However, a decrease in demand for fuels due to warmer winter conditions and higher fuel prices moderated the increase in emissions (EPA 2007a). California is a substantial contributor of GHG as it is the second largest contributor in the U.S. and the sixteenth largest in the world (California Energy Commission (CEC) 2006). In 2004, California produced 492 Tg CO<sub>2</sub> Eq. (542,331,600 tons) (CEC 2006), which is approximately seven percent of U.S. emissions. The major source of GHG in California is transportation, contributing 41 percent of the State's total GHG emissions (CEC 2006). Electricity generation is the second largest source, contributing 22 percent of the State's GHG emissions.

**Global Climate Changes.** Global climate change (GCC), which most scientists believe is caused by GHG emissions, is a widely discussed economic, political, and scientific issue in the United States. GCC is a change in the average weather of the earth that may be measured by changes in temperature, precipitation, storms, and wind. The baseline by which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. Many recent concerns over GCC utilize this data to extrapolate a level of statistical significance specifically focusing on temperature records from the past 150 years (the Industrial Age) that differ from previous climate changes in rate and magnitude.



**Key Legislation and Policies.** The Global Warming Solutions Act of 2006, also known as Assembly Bill 32 (AB 32), was signed into law on September 27, 2006. AB 32 requires the California Resources Board (CARB) to do the following:

- By July 1, 2007, adopt a list of early action measures that can be implemented by regulation before January 2010.
- By January 1, 2008, adopt mandatory reporting requirements for significant sources.
- By January 1, 2008, establish a statewide GHG emission cap for 2020 based upon 1990 emissions levels.
- By January 1, 2009, adopt a scoping plan indicating how emission reductions will be achieved for significant GHG sources via regulations, market mechanisms, or other measures.
- By January 1, 2011, adopt regulations to achieve the maximum technologically feasible and cost effective reductions in GHG.

Western Milling, LLC is proposing the installation of a new dry poultry litter (DPL) located in the Kings Industrial Park. The facility has a number of sources that can generate Greenhouse Gases. The sources include a process heater, on site equipment, electricity use, employee vehicles and commodity delivery vehicles. The following table quantifies the Greenhouse Gases generated from these sources.

<b>Post Project Estimated Annual Greenhouse Gas Emissions (Tons/Year)</b>				
<b>Source</b>	<b>Source Type</b>	<b>CO<sub>2</sub></b>	<b>CH<sub>4</sub></b>	<b>N<sub>2</sub>O</b>
Process Heater	Fuel Combustion	966.86	a	a
On Site Equipment	Fuel Combustion	54.67	a	a
Electricity Use	Purchased Electricity	22.35	a	a
Employee Vehicles	Fuel Combustion	17.04	a	a
Commodity Delivery Vehicles	Fuel Combustion	2,255.65	a	a
<b>Total Post Project =</b>		<b>3,316.57</b>	<b>a</b>	<b>A</b>
<b>Notes:</b> The CH <sub>4</sub> and N <sub>2</sub> O component of GHG emissions were not estimated as there was not a reliable means by which to quantify these at the time this analysis was conducted. Electricity use is estimated at 50.875 MW/yr. Emissions are based on the data contained in the CCAR Version 3.0 reporting protocol.				



**Thresholds of Significance.** There are no widely accepted published thresholds of significance for determining the impact of GHG emissions from an individual project, or from a cumulative perspective, on GCC. Without established guidelines or thresholds of significance, the District evaluates project related impacts on global climatic change on a case by case basis. The Global Warming Solutions Act of 2006 (AB 32) requires that by 2020 the state's greenhouse gas emissions be reduced to 1990 levels, a roughly 25% reduction under business as usual estimates. AB 32 mandates the California Air Resources Board (ARB), under the California Environmental Protection Agency, to prepare plans to achieve the objectives stated in the Act. Consistent with the mandate, ARB has prepared draft guidance for assessing GHG impacts. Total project related GHG emissions are estimated to be 3,316.57 MT CO<sub>2</sub>e/yr, and are below ARB's draft quantitative significance standard for industrial projects, of 7,000 MT CO<sub>2</sub>e/yr for operational emissions (excluding transportation). Therefore, the District finds that project related impacts on global climatic change would be less than significant.



# **ATTACHMENT A**

Comments and Responses for  
Initial Study/Proposed Mitigated Negative Declaration  
Western Milling, LLC. in Hanford, CA



The following parties provided written comments on the proposed Initial Study/Mitigated Negative Declaration:

- California Regional Water Quality Control Board, Central Valley Region

A copy of the respective comment letter is incorporated into this document as attachment A. A summary of salient comments and associated responses follow.

**California Regional Water Quality Control Board, Central Valley Region:**

1. **Comment:** The initial Study and Proposed Mitigated Negative Declaration need to evaluate how storm water at the DPL will be managed.

**Response:** Storm water will be managed consistently with the requirements of Hanford Industrial Park's storm water control plan and water discharge requirements. Additionally, the Facility is graded such that all storm water collected on site will be retained on site within the on-site storm water retention basin.

2. **Comment:** The Mitigated Negative Declaration should include a mitigation measure to require that best management practices are implemented that will prevent or minimize pollutants from the raw or finished materials from entering the Industrial Park's storm water system, or any on-site storm water detention/retention basin.

**Response:** Western Milling's Hanford DPL facility will use a water truck to comply with SJVUAPCD Regulation VIII requirements. Standing water and water runoff to the onsite retention basin or to the Industrial Park's storm water system is not part of the normal operation at the Facility. Finished product will be stored under shelter at the Facility, to prevent damage which would occur if the finished product were exposed to inclement weather or storm water. The only water produced on site is storm water.

3. **Comment:** If liquid waste will be discharged at the facility, then the Initial Study and Proposed Mitigated Negative Declaration need to evaluate the discharge (unless it was evaluated in the 1975 CEQA document).

**Response:** Facility will not generate significant amounts of wastewater. Delivery vehicles will not be washed at this site. Occasional cleaning of Facility onsite equipment is performed with a high-pressure washer, which generates significantly less wastewater than a hose attached to a spigot. Cleaning activities will not generate enough wastewater to cause standing water or to cause runoff. The mentioned spray bars are not irrigation spray equipment, but are water misters, to create fine water droplets used capture and suppress dust at transfer points. Under



normal operating conditions, the water misters will not create standing pools and certainly would not generate runoff. Liquid waste will not be generated at the facility.

4. **Comment:** Western Milling will need to file a Report of Waste Discharge with the Central Valley Water Board for any discharge of waste that could affect the quality of waters at the site.

**Response:** Since the operation does not generate wastewater, Facility will investigate the need to file a Report of Waste Discharge.

5. **Comment:** The township and range location listed in the Initial Study and proposed Mitigated Negative Declaration (SE ¼ of Section 12, T11N, R22W) appears incorrect.

**Response:** The RWQCB is correct. The location should read SE/4 Sec 12, Township 19S, Range 21E. Facility will be located near the northwest corner of the intersection of Iona and 10<sup>th</sup> Avenues, as previously described.

6. **Comment:** In accordance with section 15073(d) of the State CEQA Guidelines, the District should submit the Initial Study and Proposed Mitigated Negative Declaration to the State Clearinghouse for distribution.

**Response:** The project is not of statewide, regional, or area wide environmental significance. Copies of the Draft Mitigated Negative Declaration were mailed directly to the appropriate state agencies, versus, relying on the State Clearinghouse to redistribute the documents. Thus, the notification requirement was met.



# California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, P.E., Chair

Linda S. Adams  
Secretary for  
Environmental  
Protection

1685 E Street, Fresno, California 93706  
(559) 445-5116 • Fax (559) 445-5910  
<http://www.waterboards.ca.gov/centralvalley>



Arnold  
Schwarzenegg  
Governor

19 May 2009

Mr. David McDonough  
San Joaquin Valley Air Pollution Control District  
1990 East Gettysburg Avenue  
Fresno, CA 93726

Received  
MAY 20 2009  
SAN JOAQUIN VALLEY  
SJVAPCD

## INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION, WESTERN MILLING, LLC, KINGS COUNTY, PROJECT No. 20090113

The San Joaquin Valley Air Pollution Control District (District), as lead agency for CEQA, circulated an Initial Study and Proposed Mitigated Negative Declaration for a dry poultry litter (DPL) facility in Kings County. The CEQA documents were received by the Central Valley Water Board on 24 April 2009. The project proponent is Western Milling, LLC. The facility would comprise 55 acres of the Kings Industrial Park, which is about two miles south of the City of Hanford at the northwest corner of Iona and 10<sup>th</sup> Avenues.

The Initial Study and Proposed Mitigated Negative Declaration conclude there would be no impacts to water quality from the proposed DPL facility. The discussion states that the Kings Industrial Park was subject to CEQA review in 1975 and there is no evidence the current project would result in impacts not previously considered in 1975.

- 1 The Initial Study and Proposed Mitigated Negative Declaration need to evaluate how storm water at the DPL facility will be managed (unless it was evaluated in the 1975 CEQA document). The project description states that raw poultry litter, feed additives, and finished DPL will be stored at the facility in stockpiles, or various bins, hoppers, and tanks. The Mitigated Negative Declaration should include a mitigation measure to require that best management practices are implemented that will prevent or minimize pollutants from the raw or finished materials from entering the Industrial Park's storm water system, or any on-site storm water detention/retention basin.
- 2

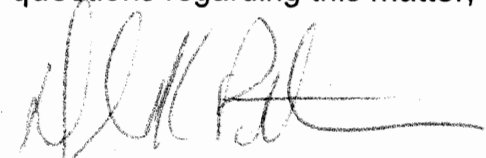
- 3 In the experience of Central Valley Water Board staff, facilities such as the proposed DPL facility often generate wastewater from vehicle and equipment washing and from maintenance activities. In addition, the Project Description mentions spray bars for dust suppression, which could potentially generate liquid waste. If liquid waste will be discharged at the facility, then the Initial Study and Proposed Mitigated Negative Declaration need to evaluate the discharge (unless it was evaluated in the 1975 CEQA document). In addition, Western Milling will need to file a Report of Waste Discharge with the Central Valley Water Board for any discharge of waste that could affect the quality of waters at the site. Otherwise,
- 4 the Mitigated Negative Declaration should include a mitigation measure that prohibits the

discharge of wash water or any other waste at the facility to the Industrial Park's storm water system, or to any on-site storm water detention/retention basin.

5 [ Additionally, the township and range location listed in the Initial Study and Proposed Mitigated Negative Declaration (SE ¼ of Section 12, T11N, R22W) appears incorrect. If the Kings River Industrial Park is at the northwest corner of the intersection of Iona and 10<sup>th</sup> Avenues, review of the USGS Hanford Quadrangle 7.5 minute topographic map indicates the correct listing for the Kings River Industrial Park and the DPL facility should be the SE ¼ of Section 12, T19S, R21E. The Initial Study and Proposed Mitigated Negative Declaration should be amended to list the correct facility location.

6 [ In accordance with section 15073(d) of the State CEQA Guidelines, the District should submit the Initial Study and Proposed Mitigated Negative Declaration to the State Clearinghouse for distribution.

Thank you for the opportunity to comment on this proposed project. If you have any questions regarding this matter, please contact Jeff Pyle at (559) 445-5145.



DOUGLAS K. PATTESON  
Senior Engineer  
RCE No. 55985

cc: Doug Shaffer, Insight Environmental  
Bob Berczynski, Western Milling, Goshen