



Jose Bautista
1222 First Ave
MS 501
San Diego, CA 92101-4153

PROJECT NAME / NUMBER: New Leaf Biofuel / 697394 CEQA Categorical Exemption

Dear Mr. Bautista,

This is in reference to the City of San Diego, Development Services Department's approval of a Neighborhood Development Permit (Project) for New Leaf Biofuel, LLC. and determination that the Project is categorically exempt from CEQA. The Project proposes to construct a private 12-inch underground pipe within and across the public right-of-way between two biofuel facilities located at 2285 Newton Avenue and 2317 Newton Avenue. The San Diego County Air Pollution Control District (APCD) is the local air pollution control agency responsible for permitting of stationary sources of air pollution in San Diego County. This Project is subject to APCD permitting requirements.

The APCD has received numerous odor complaints from the community surrounding this facility and is currently working through a Stipulated Order for Abatement with the facility in an attempt to reduce odors from its operations. The odors stem from the nature of the material used by the facility to produce biofuels. The APCD is not appealing the City's decision to approve the Project because an underground pipe has the potential to reduce odors when replacing or reducing product that is currently transported by truck loading and offloading operations. However, even an underground pipe has the potential to create odors if not properly maintained. Therefore, it is recommended that the City include the following conditions into the Neighborhood Development Permit in order to minimize any potential odors associated with the use of this underground pipe.

- Install grease filtration/removal system prior to conveying oil and grease through the underground pipe.
- The underground pipe should be maintained to prevent leaks including those from pumps, flanges, valves, connectors, open-ended lines, etc.
- Maintenance and repair of the underground pipe and associated equipment, such as pumps, flanges, valves, connectors, open-ended lines, etc. should be conducted under negative pressure, such as vacuum truck or odor control system with fan to ensure negative pressure and ventilation to odor control system.

Lastly, in accordance with APCD Rule 10, the facility is required to obtain an Authority to Construct from the APCD prior to starting any construction associated with this Project. Thanks for your consideration of the APCD comments. Please feel free to contact me if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "K. Keehan". The signature is written in a cursive, flowing style.

Kathleen Keehan
Chief, Emission Reduction Strategies