



South Coast Air Quality Management District

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August 30, 2005

Mr. Andres L. Soto
City of Colton
Community Development Department
650 North La Cadena Drive
Colton, CA 92324

**Draft Mitigated Negative Declaration (DMND) for Pico Rivera Pallet Company:
File Index Number DAP-000-284, Colton. (July 2005)**

Dear Mr. Soto:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:CB

SBC050727-02
Control Number

**Draft Mitigated Negative Declaration (DMND) for the Pico Rivera Pallet Company
(FIN DAP-000-284, July 2005)**

1. **Construction NO_x Emissions:** The NO_x emissions exceed the significance threshold, but the lead agency argues on page 15 of the DMND that “due to the short-term nature of the construction of the project, and the fact that the only criteria pollutant that is exceeded is NO_x, air quality impacts resulting from the project are considered less than significant.” SCAQMD staff disagrees with these statements for the following reasons.

First, regarding the short-term nature of construction emissions, the lead agency is reminded that designations of non-attainment are based on daily exceedances of an ambient air quality standard. Consequently, whether or not emissions are temporary is irrelevant to determining air quality significance. Second, the fact that the other criteria pollutants are not significant does not minimize the significance of the remaining pollutant, NO_x, which the analysis shows exceeds the significance threshold. It is recommended that the statements be deleted in the Final MND in light of these comments. Further, the lead agency should conclude that construction air quality impacts for NO_x are significant, or quantitatively demonstrate that NO_x emissions be mitigated to less than significant.

2. **Mitigation for NO_x Construction Emissions:** The lead agency states on page 15 of the MND that even with incorporation of mitigation measures, NO_x construction emissions will still exceed the significance threshold. A review of the mitigation measures proposed by the lead agency on pages 16 and 17 of the DMND shows that the lead agency has proposed only two measures to reduce NO_x construction emissions. To further reduce NO_x emissions, SCAQMD staff proposes three other mitigation measures for consideration by the lead agency.

- Use alternative clean fuel such as electric or compressed natural gas-powered construction equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use emulsified diesel, which can reduce NO_x emissions by 14%, or low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content. This has the potential to reduce NO_x emissions by 50 percent.
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.
- Limit the hours of operation of one or more pieces of construction equipment.

3. **Mitigation Measure MM Air 2:** The mitigation measure on page 1 of the Air Quality Impact Analysis and the second bullet on page 16 of the DMND, should be

revised to prohibit heavy-duty vehicles from idling more than five minutes, to be consistent with state law.

4. **Daily Vehicle Trips:** Review of the URBEMIS 2002 output files indicates that the default number of daily trips, 1,275.16, is less than the number of daily vehicle trips identified in the traffic analysis, 1,390 (page 26 of the DMND). Since vehicle trips directly affect operational emissions, operational emissions have been underestimated for the proposed project. Operational emissions in the Final MND should be revised to reflect the correct number of vehicle trips.
5. **Project Impacts on Sensitive Receptors:** On page 16 of the DMND, the lead agency dismisses potential impacts to sensitive receptors due to (1) implementation of mitigation measures; (2) the expanded facility emits the same type and level of air particulates as the existing facility; therefore, sensitive receptors will not likely perceive any increase in emissions. The SCAQMD rejects this rationale because the lead agency has not adequately analyzed operational impacts and has not quantitatively proven that there will be no impacts to sensitive receptors. According to the traffic default values from the URBEMIS 2002 model output in Appendix A of the Air Quality Impacts Analysis, the proposed project is expected to generate 1,275.16 trips per day (1,390 trips per day according to the traffic analysis). The lead agency changed the default percentage of heavy-duty trucks in the URBEMIS 2002 model from 0.8 to 9.5. This means that the proposed project will generate 106 new heavy-duty trucks trip per day ($0.095 \times 0.875 \times 1275$).

The California Air Resources Board has designated diesel particulates as a carcinogen since August 1998. The SCAQMD requests that a mobile health risk assessment be prepared pursuant to the SCAQMD guidance which can be accessed at the SCAQMD website: www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. If the cancer risk exceeds ten in a million, specific mitigation measures must be identified by the lead agency to reduce this risk. The SCAQMD guidance document has recommended mitigation measures which the lead agency may consider for implementation.

6. **Operational Emissions:** The lead agency omits operational emissions from the analysis of new pallet construction operation, particulate emissions from woodworking, stating that the use of a baghouse reduces PM10 emissions below significance levels and, therefore, exempts the facility operating from obtaining a permit from the SCAQMD. This statement may be true and relevant to SCAQMD Rule 1137 and SCAQMD permit requirements. It does not, however, relieve the lead agency from the responsibility of calculating baghouse PM10 emissions under CEQA. Therefore, the lead agency should calculate PM10 emissions from the baghouse and any other emissions from equipment at the facility and add the results to Tables 4 and 5 on page 11 of the Air Quality Impact Analysis and then compare the totals to the appropriate significance thresholds.
7. **CO Hot Spots Analysis:** Traffic data was not provided with the DMND, therefore SCAQMD staff could not verify that traffic volumes and emission factors were correctly

applied. The Final MND should include the traffic report. In the future, please provide the SCAQMD with all supporting documentation relative to the air quality analysis along with the draft CEQA document.

Links were not labeled. However, when aerial photos of the intersection were reviewed, the spatial locations of the intersection modeled did not appear to match the spatial locations seen in the aerial photos. It appears as though the west bound approach and departure links were mistakenly located parallel to the north bound departure and south bound approach lanes. In the final MND, links should be clearly labeled and corrections to spatial locations should be made if necessary.

Some receptors have been placed within three meters of either side of the roadway, which is considered within the mixing zone of traffic. The CALINE4 modeling should follow the CALTRANS Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997, which can be downloaded from the CALTRANS website at <http://www.dot.ca.gov/hq/env/air/coprot.htm>. The CO Protocol states that receptors should not be placed within three-meter mixing zone on either side of the roadway. Final MND should not include CALINE4 modeling with receptors placed within the three meter mixing zones on both sides of the roadway.