



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

**FAXED: DECEMBER 9, 2005**

December 9, 2005

Mr. Matthew Bassi  
City of Pomona  
Planning and Community Development Department  
505 South Garvey Avenue  
Pomona, CA 91769

Dear Mr. Bassi:

**Draft Environmental Impact Report (DEIR) for the Grand Central Waste Transfer Station:  
Pomona: October 27, 2005**

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 Environmental Impact Report.

SCAQMD staff is concerned that the lead agency has not recommended enough feasible mitigation measures to reduce the adverse air quality and transportation impacts from a project that will generate daily traffic of approximately 783 heavy-duty diesel transfer, collection and self-haul trucks. Further, given that the project will also present a Maximum Incremental Cancer Risk (MICR) ranging from 28.5 to 57.8 in one million, cancer risks that are above the SCAQMD-recommended significance threshold, SCAQMD staff is concerned that the lead agency has not exhausted recommended feasible mitigation measures that will protect the public health of nearby sensitive receptors.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. 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  
LAC051028-03  
Control Number

**Draft Environmental Impact Report (DEIR)  
for the Grand Central Waste Transfer Station: Pomona**

1. **Project Construction Emissions:** The lead agency used the California air Resources Board (CARB)-approved URBEMIS 2002 model to estimate project emissions as recommended by SCAQMD. However, the lead agency made some erroneous assumptions regarding the input data which may have led to the URBEMIS model underestimating the air quality impacts of the proposed project. For example, on the first page of the detailed printout for construction emissions, the acreage listed is 10.5 acres instead of 14.5 acres. The square footage listed in the model output is 69,000 square feet instead of the total building area of 85,400 sq. ft.

Furthermore, the traffic analysis shows in Table 3.10-6 on page 3.10-17 of the DEIR that at buildout, the proposed project will generate 1,632 vehicle trips per day, while the URBEMIS model shows only 876.99 vehicle trips per day. This means that actual project emissions are greater than the emissions shown in the URBEMIS printout, and the cancer risks could be much higher than those shown in the DEIR.

Given the above reasons, SCAQMD staff suspects project construction emissions may have been underestimated. SCAQMD staff therefore recommends that the lead agency rerun the URBEMIS 2002 model using the correct inputs. Should project construction emissions exceed the SCAQMD significance thresholds, the lead agency should recommend measures to reduce those emissions to less than significance. See also comment on demolition emissions below.

2. **Fueling Island:** On page 2-5 of the DEIR the lead agency describes the fueling island that will be located at the southeastern corner of the project site. The lead agency, however, does not provide any information about this island, especially relating to the number of pumps that will be located there nor the emissions that will be generated from these pumps. In addition, two of the assumptions used in the Hotspots Analysis and Reporting Program (HARP) and noted on page 3.2-19, are contradictory, as discussed below.

The first assumption states that apart from emissions from the transfer, collection and self-haul trucks, no other sources of diesel emissions or other toxic emissions will be on site. Please note that fumes from gasoline station pumps contain toxic substances. The second assumption states that no onsite refueling will occur. Please clarify this apparent discrepancy in the Final EIR. SCAQMD staff would like to know why a fueling station is being built at the project site if there will not be any onsite refueling.

Please note that fuel pumps are SCAQMD-permitted sources. To receive a permit from the SCAQMD, the fuel pumps must undergo a health risk assessment (HRA) pursuant to SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants. The HRA should be performed specifically for the fueling station component of the proposed project.

Given that the Maximum Incremental Cancer Risk (MICR) for the nearest sensitive receptor, as reported on page 3.2-20 of the DEIR, already exceeds the threshold at 28.5 in one million, the addition of the risk from the fueling island would greatly worsen this health hazard.

3. **Demolition Emissions:** The lead agency describes the project site as comprising approximately 14.5 acres of relatively flat, vacant and disturbed land. See pages ES-1 and 2-1 of the DEIR. The project description does not list any structures on the site that need to be demolished before grading and building construction can begin. Yet the URBEMIS output printout shows emissions from demolition. Please correct this discrepancy in the Final EIR.
4. **SCAQMD Greenwaste Management Rule:** In discussing the SCAQMD rules that the proposed project will be subject to, the lead agency fails to mention that greenwaste chipping and grinding operation is subject to SCAQMD Rule 1133.1 – Chipping and Grinding Activities.
5. **Mitigating Operational NO<sub>x</sub> Emissions:** Though the cancer risk at 28.5 in one million for the nearest sensitive receptor greatly exceeds the significance threshold, the lead agency proposes to implement only one mitigation measure on page 3.2-21 of the DEIR to reduce diesel exhaust emissions. The lead agency proposes to have waste handling equipment employ diesel particulate filters and/or other types of emissions controls or alternate fuels to reduce diesel particulate matter and nitrogen oxides emissions, if available. SCAQMD staff considers this mitigation measure inadequate.

On page 3.2-20, the lead agency attributes the high cancer risk mostly to emissions from diesel-powered loaders operating in the transfer building. The lead agency claims that there are no alternative fueled loaders currently commercially available, therefore the diesel emissions cannot be reduced. Please note that CARB has certified emulsified diesel for use on construction and other equipment. Information on commercial availability of these products can be obtained at the following websites:

[www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html](http://www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html),  
[www.lubrizol.co/PuriNox/markets\\_distributors.asp](http://www.lubrizol.co/PuriNox/markets_distributors.asp),  
[www.cleanfuelstech.com/Customers/Customers.htm](http://www.cleanfuelstech.com/Customers/Customers.htm).

Mitigation measure AQ-5 proposes to use a mechanical sweeper, hand-brooming and wipedown to remove dust and dirt. SCAQMD staff recommends the use of “clean” sweepers, i.e., sweepers using natural gas in place of regular diesel.

SCAQMD staff recommends the following additional mitigation measures for consideration by the lead agency where feasible:

- For all equipment, such as yard tractors, loaders and other service equipment including front loaders, require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, use oxidation catalysts and low-sulfur diesel as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO<sub>x</sub> emissions by 50 percent.

- Require the use of aqueous or emulsified diesel fuel for all equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16% in NO<sub>x</sub> and 60% from diesel exhaust.
- Require the use of newer, lower-emitting trucks from companies and cities that will be dumping materials at the site.
- Create a buffer zone of at least 1,000 feet between the waste station and sensitive receptors.
- Design the waste transfer station such that truck traffic within the facility is located away from the property lines closest to its residential or sensitive receptor neighbors.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes in compliance with state law.
- Require waste transfer station management to train employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility.
- Require waste transfer station management to clearly define primary entrance and exit of the station.
- Require waste transfer station management to establish specific truck routes between the center and the nearest freeway.
- Place signs at the exits of the waste transfer station that indicate which way to turn and the specific truck route to take to get to the freeway.
- Require waste transfer station management to provide flyers and pamphlets for truck drivers informing truck drivers of the health effects of diesel particulate and the importance of being a good neighbor.
- Require waste transfer station management to conduct periodic community meetings informing neighbors of steps being taken to reduce and/or eliminate diesel particulate emissions at the station.

6. **Odor Mitigation Measures:** The SCAQMD has identified various best management practices and techniques for odor mitigation at Municipal Solid Waste (MSW) transfer stations and Materials Recovery Facilities (MRFs), many of which are embodied in the current draft of Proposed Rule 410 – Odors From Transfer Stations and Material Recovery Facilities.

While Proposed Rule 410 is still in a developmental stage, the odor reduction practices and techniques it identifies conceptually have been observed or otherwise determined to be effective in reducing odor complaints at existing transfer stations and MRFS.

For the Proposed Grand Central Waste Transfer Station with a maximum daily throughput of 1500 tons per day, SCAQMD staff recommends the following best management practices and techniques for reducing nuisance odors from the Proposed Project as contained the DEIR.

- The proposed project states that the waste dumping, sorting and processing will be restricted to “inside the building.” SCAQMD recommends a full enclosure, consisting of a permanent roof structure covering the tipping floor and four walls. Openings for the ventilation and access should not exceed 2% of the sum of the area of the wall and the horizontal projection of the roof.

- Limit the drop height from the tipping floor into the transfer trucks to three feet or less.
- For the transfer tunnel, include placement of physical barriers, such as plastic flaps or operate an odor reduction misting system, at the entrance or exit to the transfer tunnel, whichever is more directly downwind of the prevailing wind for the proposed project.
- If recycled containers that contained dairy products or other organic food products are held for more than 24 hours after baling, such containers should be completely covered with a tarp or odor-impermeable membrane; or stored inside of a partial enclosure, consisting of a roof structure and at least two walls, provided one wall is downwind of the prevailing wind at the Proposed Project; or stored inside of a complete enclosure, consisting of a roof structure and four walls.
- Install a weather monitoring station to monitor temperature, humidity, wind speed and wind direction. The Proposed Project should plan to identify levels of temperature, humidity, wind speed and wind direction leading to offsite odor complaints as part of the CIWMB Odor Impact Minimization Plan (OIMP) or other odor management plan.
- Sweep the tipping floor at least once per day.
- Sweep the transfer tunnel at least once per day.
- Sweep all areas within the facility property in which waste from transfer operations accumulates at least once per day.
- Implement procedures to identify and handle especially odiferous incoming loads of MSW.
- Cover transfer trucks within 15 minutes after loading. Trucks that are pre-loaded for disposal at a landfill or other final disposal location on the following day should be covered with a tarp or other odor-impermeable membrane, and should be parked in a covered area within 60 minutes of loading.
- Implement a community outreach program to include a publicly displayed sign with contact information for odor complaints, a log for all odor complaints received, an employee to coordinate odor complaint response, and a protocol for handling odor complaints.

Further, AQMD recommends that the Proposed Project incorporate the following design elements that would be of additional value for odor reduction to prevent odor nuisances.

- The building should be equipped with a ventilation system which is designed to contain odorous air in the building and direct it to a release point where dispersion may be maximized. The system shall have provisions to accommodate an odor control system designed to reduce odors sufficient to prevent public nuisances.

- The ventilation system should be designed to maintain an inward face velocity of air through each opening in which air can enter the building a minimum of 100 feet per minute.

## 7. Health Risk Assessment

- The rural dispersion coefficient and calms processing routine were used to estimate concentrations in the air dispersion model. SCAQMD staff requires that the urban dispersion coefficient is used and that the calms processing routine is bypassed for all air dispersion modeling for proposed project within SCAQMD jurisdiction. The Final EIR should include air dispersion modeling with the urban dispersion coefficient and the calms processing routine bypassed.
- The emission factors used to estimate emissions are referenced as ARB certified emission factors. However, the emission factors in the calculations do not match the emission factors presented on the technical data sheets included in the document.

Description	Pollutant	Technical Sheet Emission Factors g/kw-hr	Technical Sheet Emission Factors g/bhp-hr	Draft EIR Emission Factors g/bhp-hr
966H Loader	PM	0.2	0.27	0.15
	NO <sub>x</sub> + NMHC	3.8	5.1	2.68
	CO	3.3	4.4	2.46
980H Loader	PM	0.16	0.22	0.12
	NO <sub>x</sub> + NMHC	3.4	4.4	2.54
	CO	3.4	4.6	2.54

In addition, although ARB certified emission factors were available, EPA Tier III emissions were used to estimate PM emissions. The emission factors used were lower than the ARB certified emission factors. The Final EIR should include emissions and risk analysis based on the higher ARB certified emission factors.

- The Draft EIR does not state that operators would purchase and use the 966H and 980H loaders as presented in the emission estimates and risk assessment. The Final EIR should either state that the 966H and 980H loaders as presented in the emission calculations would be used as a part of the proposed project description or as a mitigation measure. If operators may not use the loaders as presented in the emission estimates and risk assessment, then the emission estimates and risk assessments should be changed to reflect the equipment that would be used for the proposed project.
- The Draft EIR does not include LST analyses for construction and operation. The Final EIR should include LST analyses for construction and operations. Methodology for LST analyses can be found on the SCAQMD website at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

- The risk assessment assumption on page 3.2-19 states that no onsite refueling would occur. While collection and transfer trucks are licensed for on-road travel, it is not expected that loaders would be licensed to be driven on city streets; therefore, it is not clear from the document where the loaders would be fueled. If the loaders would be fueled on-site, the fueling operations should be addressed in the risk analysis for the Final EIR.

**8. CO Hotspots**

The Draft EIR does not include a discussion of CO hotspots. Even though the level of service (LOS) for all intersections are above C, a discussion of CO hotspots should be included in the Final EIR.