



South Coast Air Quality Management District

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FAXED: JUNE 24, 2005

June 24, 2005

Mr. Cuong Nguyen
City of Santa Fe Springs
Department of Planning and Development
11710 Telegraph Road
Santa Fe Springs, CA 90670-3679

Dear Mr. Nguyen:

**Mitigated Negative Declaration (MND) for Reconsideration of CUP Case No. 206
(Norwalk Industries: May 2005)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. As a responsible agency for the proposed project, the SCAQMD finds that the air quality analysis for the proposed project is inadequate because it does not sufficiently quantify air quality impacts. As a result, the mitigated negative declaration cannot be relied on by the SCAQMD as the CEQA document for any future permit applications that may be submitted to the SCAQMD for processing.

The SCAQMD requests that the lead agency quantify air quality impacts and recirculate the document pursuant to CEQA Guidelines Section 15073.5. 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

LAC050525-07
Control Number

**Mitigated Negative Declaration (MND) for Reconsideration of CUP Case No. 206
(Norwalk Industries: May 2005)**

1. **Project Air Quality Emissions:** The project proponent proposes to (i) increase the daily capacity of the transfer station from 27 tons of municipal solid waste to 100 tons, (ii) increase the capacity of the facility to process greenwaste from 200 to 500 tons per day, and finally (iii) construct a 17,600 or 13,400 sq. ft. building for the greenwaste operations. The lead agency, however, provides little or no information or data on the air quality impacts of these proposed developments. The lead agency first needs to clarify the actual size of the building, either 17,600 sq. ft. building as stated on page 6 or 13,400 sq. ft. as stated on page 15 of the MND. The construction of this building, which would require the use of construction equipment, off-site trucks conveying construction materials and debris, and construction worker vehicles, will generate emissions. Similarly, the lead agency needs to quantify operational emissions including emissions from stationary sources, (e.g., internal combustion engines used to generate electricity, etc.), chipping and grinding equipment, on-site mobile sources, (e.g., loaders), and off-site mobile sources hauling material to and from the facility.

Further, the lead agency has included mitigation measure 1.1, which inappropriately defers the analysis of air quality impacts to some future date. Without disclosing air quality impacts from the proposed project, the lead agency has denied the public the opportunity to review, evaluate, and provide comments on potential air quality impacts from the proposed project. Without quantifying these emissions, the lead agency cannot conclude that the air quality impacts will be less than significant.

To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emission calculation methodologies from the SCAQMD 1993 CEQA Air Quality Handbook (Handbook) or use the current version of the California Air Resources Board (CARB)-approved model URBEMIS 2002, which is available on the SCAQMD website at: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that project emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.

Once construction and operational air quality impacts have been quantified, the lead agency should revise the MND and recirculate it for public review pursuant to CEQA Guidelines Section 15073.5.

2. **Diesel Truck Emissions:** The expansion of operations at the transfer station will mean an increase in the number of vehicles, especially trucks, that will be traveling to and from the transfer station. The lead agency states on pages 5 and 6 of the MND that approximately 75-80 "public vehicles" will utilize the transfer station per day, and green waste will be brought to the facility by 70 vehicles per day, and chipped materials will be dispatched onto approximately 20 transfer vehicles per day. The lead agency needs to

clarify whether or not these numbers represent vehicle trips or simply vehicles. If the latter, then the lead agency needs to specify the number of vehicle trips.

The increase in emissions from these additional vehicle trips needs to be quantified. Furthermore, with the designation of diesel particulates as a carcinogen by the California Air Resources Board (CARB), the health impacts of diesel particulates from truck traffic on nearby sensitive receptors (listed on page 7) also need to be assessed. The SCAQMD has prepared a methodology for performing an air toxics health risk analysis of truck emissions. This methodology can be accessed at the SCAQMD website at: www.aqmd.gov/ceqa/handbook/diesel_analysis.doc under Health Risk Assessment Guidance. The health risk assessment should also include diesel particulate emissions from on-site sources, e.g., front loader, etc.

3. **Emissions from Greenwaste and Transfer Station Activities:** Although the lead agency proposes on page 7 of the MND to conduct greenwaste activities such as chipping and grinding in a fully enclosed building equipped with a negative pressure ventilation, the lead agency has not provided any data on the emissions that will be generated by equipment that will be used on the project site but outside the building. The lead agency should be aware that the greenwaste chipping and grinding operation is subject to SCAQMD Rule 1133.1 – Chipping and Grinding Activities.

Other emission sources from the greenwaste operations should also be quantified. For example, it is stated on page 7 of the MND that a front loader will be used to feed the tub grinder and to load the transfer trailer for transfer offsite. Furthermore, it is stated on page 6 that a loader will be used to push the waste materials into a storage pile area where salvageable material will be hand sorted by transfer station personnel. The loader will subsequently load the remaining waste material into a transfer vehicle. The lead agency needs to quantify emissions from all sources that are present during the operational phases of both the transfer station and the greenwaste facility. The emission sources include stationary and portable equipment, fugitive dust emissions, and on-road mobile sources and off-road mobile sources associated with the project. The lead agency also needs to present for review, either in the text or the appendix, the emission factors and the hours of operation for the site equipment. This information will help account fully for operational emissions as well as facilitate review of the analysis of the air quality impacts.

4. **Mitigation Measures:** The mitigation measures identified by the lead agency do little to reduce potentially significant air quality impacts from the proposed project. For example, as already noted, mitigation measure 1.1 inappropriately defers quantifying air quality impacts to some future date. Mitigation measure 1.2 simply states that a permit to operate shall be obtained for the transfer station equipment. If a permit is required from the SCAQMD, then this is not mitigation. The mitigation measure does not identify specific measures to reduce air quality impacts. Mitigation measure 1.3 states that the project shall comply with SCAQMD Rule 402. The project proponent must comply with Rule 402, so this would not be considered mitigation. Further, no measures are identified to reduce odor nuisances from the project. Finally, mitigation measure 1.4 requires

removing green wastes within 48 hours of receipt of the waste. This is already required by Rule 1133.1. Consequently, the lead agency has not identified any mitigation measures with emission reduction benefits.

Since the air basin is currently designated as non-attainment for both the federal and state ozone, carbon monoxide and particulate matter (PM10) standards, it is important that the lead agency identify and ensure the implementation of any measures which would help reduce any of these criteria pollutants. The following measures are recommended for the lead agency to consider where applicable or feasible:

- For construction equipment, require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines, or if diesel equipment has to be used, use particulate filters, oxidation catalysts and low sulfur diesel as defined in AQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
- Trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
- Use alternative-fueled yard tractors/loaders and other service equipment.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Improve traffic flow in the project vicinity through signal synchronization.
- Also use double-paned windows to reduce thermal loss.
- Create a buffer zone of at least 1,000 feet between warehouse and sensitive receptors. Buffer zone can be office space, employee parking or greenbelt.
- Require the use of newer, lower-emitting trucks.
- Require trucks to be properly tuned and maintained.
- Require the installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use.
- Require training of warehouse managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.
- Design warehouse to ensure truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Reroute truck route to avoid residential areas or schools.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the warehouse complex where trucks can rest overnight.
- Use light-colored roofing materials in construction to deflect heat away from buildings.
- Install automatic lighting on/off controls and energy-efficient lighting.

- Landscape with appropriate drought-tolerant species to reduce water consumption.
- Provide food options, fueling, truck repair and or convenience store on-site or within the warehouse complex to minimize the need for trucks to traverse through residential neighborhoods.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the Handbook.