



South Coast Air Quality Management District

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FAXED: AUGUST 18, 2006

August 18, 2006

Ms. Paula Kelly
City of Irwindale
Planning Department
5050 North Irwindale Avenue
Irwindale, CA 91706

Dear Ms. Kelly:

**Initial Study/Mitigated Negative Declaration for the
Proposed Roll Off Bin Storage and Truck Yard: CUP 1-06**

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 available 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

LAC060727-01
Control Number

**Initial Study/Mitigated Negative Declaration (IS/MND) for the
Proposed Roll Off Bin Storage and Truck Yard: CUP 1-06**

1. **Project Air Quality Emissions:** The lead agency has not provided any air quality data or quantified the construction and operational emissions from the proposed project. The lead agency has, therefore, not demonstrated that the proposed project's air quality impacts would not be significant.

To calculate potential adverse construction and operation 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 CARB-approved model URBEMIS 2002, which is available on the SCAQMD website: www.aqmd.gov/ceqa/models.html.

If quantification of emissions reveals that the project's emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce emissions to less than significance.

2. **Mitigation Measures:** If construction or operational air quality impacts from the proposed project are concluded to be significant, the following measures are recommended for the lead agency to consider where applicable or feasible:
- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
 - Require the use of alternative clean fuel such as compressed natural gas-powered 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 particulate filters, 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_x emissions by 50 percent.
 - Use electricity from power poles instead of from temporary diesel- or gasoline-powered generators.
 - Trucks hauling dirt, sand, gravel, soil or construction debris are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
 - Restrict idling emissions by using auxiliary power units and electrification.
 - Enforce truck parking restrictions.
 - Redirect truck route to avoid residential areas or schools.
 - Institute waste spray for unloading and loading of cement and other dry particulate loads.

- Use portable sprayers to control more localized dust sources, including construction and demolition material, e.g., wall board.
- Use portable sprays with deodorants on odorous materials such as green waste.
- Require station management to train 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 in compliance with state law.
- Provide electrical sources for service equipment and docking of trucks.

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

3. **Green Waste:** The IS/ND is inconsistent with regard to the types of waste material that would be brought to the facility. The lead agency states on pages two and seven of the Environmental Checklist Form that only solid inert materials will be accepted at the site and that the applicant shall be prohibited from storing refuse in the bins that may become putrid and create objectionable odors. The lead agency, however, will allow green wastes along with the inert materials. Green wastes are putrescible and, therefore, may create odor impacts. Please clarify the type of waste material that would be allowed at the site in the Final MND.