South Coast
Air Quality Management District
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FAXED: JULY 7, 2006 July 7, 2006

Ms. Sabrina Chavez, Project Planner
City of Perris
Department of Developmental Services/ Planning Division
135 "D" Street
Perris, CA 92570-2200

Draft Negative Declaration for Proposed Plan Review 05-0217

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 into the Final Negative Declaration (ND).

Please provide the SCAQMD staff with a copy of the CEQA document for the proposed project when it is completed. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist, CEQA Section, at (909) 396-3302 if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:GM

RVC060615-02
Control Number

Air Quality Analysis

1. In Appendix B Air Quality Analysis (AQA) on page 4 of the URBEMIS2002 operational output sheets, the lead agency has defined the land use as a Material Recycling Facility (MRF) and has listed 350 total trips. Under Fleet Mix, the percentage of vehicles is 51 percent light automobiles and 49 percent trucks. The AQA on page 22 further states in the narration that the vehicles using the MRF will be primarily trucks. In the Final ND, the lead agency should clarify the mix of trucks and automobiles in the fleet mix to ensure the narration and the modeling emission estimates are consistent with the emissions associated with trucks and non-trucks using the proposed MRF. Currently, the Draft ND is showing a slight majority of non-truck vehicles in the Fleet Mix in the URBEMIS2002 output sheets.

2. According to a telephone conversation between lead agency and SCAQMD staff, a traffic study was not prepared to analyze traffic impacts for the proposed project. From page 4 of the URBEMIS2002 modeling output sheets, total vehicle miles traveled (VMT) is 2,261. If the trips are primarily trucks (ibid. AQA page 22), the average VMT (2,261 divided by 350 total trips) would be 6.46 miles. This trip length is lower than what would normally be expected for a commercial or industrial vehicle trip length. Please provide the assumption or rationale used to derive an average trip length of 6.46 miles. If this information is not readily available, a more conservative regional figure of 80 miles per round-trip should be used to estimate the operational emissions. Using the less conservative figure of 6.46 miles per trip length, operational air quality impacts appear to be substantially underestimated.

Health Risk Assessment

3. It appears that the weighted EMFAC2002 emission factors are not weighted conservatively and may under estimate risk. Since the actual calculations are not shown, it is difficult to review the values provided in Table A of the Air Quality Analysis in the Draft EIR. It appears that from 2041 through the 2070 (27 years), the 2040 engine year emission factors are used. This would not happen in practice. After 2041 the engines would still be a mixture of new and old engines, since and EMFAC2002 includes a mixture of 45 engine model years. To be health protective, SCAQMD staff suggest that emission factors be re-weighted based on a more realistic emission factor for the years between 2041 and 2070 in the Final EIR.

4. TSCREEN3 is not typically used. TSCREEN3 includes SCREEN3 which is the standard EPA screening model. However, TSCREEN3 uses an old version of SCREEN3 (version 95250), the current version of SCREEN is 96043. The most recent version of SCREEN3 should be used for the HRA in the Final EIR. The output of the SCREEN3 version 96043 needs to be included in the Final EIR so that the public can verify the correct model was used and verify the inputs and outputs.

5. Documentation in the Draft EIR on the HRA is not complete and difficult to follow. The public would not be able to reproduce steps taken to estimate health risk. Table 6.2D in the Draft EIR presents the emission rate in grams per day. Table C presents a unitized emission rate. SCAQMD staff attempted to reproduce the values in the Draft EIR, but were not able to duplicate the results. When the input parameters in Table 6.2E were placed into SCREEN3, the result was 747.6 micrograms per square meter. If the operating time is eight-hours, then the emission rate of 105 gram per day would be 0.0036 grams per second. If the operating time is 24-hours, then the emission rate would be 0.0012 grams per second. For the eight-hour operating time, the 1-hour concentration would be 2.73 micrograms per square meter. For the 24-hour operating time, the emission rate would be 0.81 micrograms per square meter. The 0.031 micrograms per square meter reported in Table D is lower than both. The consultant does not disclose that a 0.08 conversion factor was used to convert 1-hour concentrations estimate with SCREEN3 to annual concentrations. The Final EIR needs to include clear documentation on how the HRA was completed. Without clear documentation, either in the EIR or in associated appendices, it is not certain that the lead agency has fulfilled CEQA Guidelines §§ 15147 and 15151.

6. No map was provided that shows the location of the source and the sensitive, residential and worker receptors as required by SCAQMD guidelines which can be downloaded from the SCAQMD website at http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. A map that shows the source and receptors needs to be included in the Final EIR.

Odor Management

7. In the project description, the lead agency states that the Material Recovery Facility (MRF) is expected to handle 100 to 150 tons per day after three years. Based on this annual tonnage level, the owner or operator of the MRF should therefore submit to the SCAQMD an Odor Management Plan (OMP). The OMP is a written plan that describes odor control methods or techniques at the MRF. Questions about the requirements of the OMP and to obtain an application should be directed to the SCAQMD at (909) 396-2684.

Mitigation Measures for Operational Air Quality Impacts

8. Should the lead agency determine (see comment #2) that project-specific operational air quality impacts from the proposed project would exceed the NOx and VOC daily significance thresholds, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce project-specific operational air quality impacts from the project in conjunction with other similar projects at the business park:

   Recommended Additions:

   - Prohibit all vehicles from idling in excess of five minutes, both on-site and off-site.

- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the MRF and sensitive receptors;
- Design the MRF such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the MRF such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Design the MRF to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas;
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of the facility;
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps or alternative fueled off-road equipment;
- Conduct air quality monitoring at sensitive receptors.