



South Coast Air Quality Management District

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FAXED: MAY 2, 2006

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Mr. William Davis
City of Downey, Business Development
11111 Brookshire Avenue
Downey, CA 90241

Dear Mr. Davis:

**Negative Declaration for the Kelterite Asphalt Plant at
12231 Pangborn Avenue and 12320 and 12328 Woodruff Avenue,
Downey. CUP No. 05-134**

The South Coast Air Quality Management District (SCAQMD) has reviewed the Negative Declaration for the proposed project and, in addition to the attached comments offers the following. The lead agency has not quantified construction or operational air quality impacts for the proposed project. Since the SCAQMD is likely a responsible agency for portions of the proposed project, the Negative Declaration is inadequate for the purposes of the SCAQMD's permit application process. As a result, the lead agency should revise the air quality analysis by quantifying construction and operational air quality impacts and recirculating the Negative Declaration pursuant to CEQA Guidelines Section 15073.5.

The lead agency has only circulated the Negative Declaration for a 14-day public review and comment period. Since the lead agency did not contact the SCAQMD regarding the shortened review period prior to the start of the comment period, the lead agency has not complied with the criteria for shortened review in Appendix K of the CEQA Guidelines.

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
LAC060419-02
Control Number

Negative Declaration (ND) for the Kelterite Asphalt Plant

1. **Project Air Quality Emissions:** The applicant is proposing to construct and operate an asphalt plant at 12231 Pangborn Avenue capable of producing 4,000 tons of asphalt per day by 2009. The lead agency, however, does not provide any data on emissions from the project to demonstrate that construction or operation air quality emissions do not exceed significance thresholds recommended for use by the SCAQMD. The lead agency states on page 6 of the ND that construction activities associated with the project will not emit daily levels of pollutants that exceed the Air District's thresholds of significance because the screening methodology outlined in the Air District's 1993 CEQA Air Quality Handbook (Handbook) will be used. Please note that although the screening tables in Chapter 6 of the Handbook were developed by the SCAQMD, the SCAQMD no longer supports the use of those tables. This is because the mobile source emission factors used in the tables are from an old version of the California Air Resources Board (CARB) EMFAC model. The current version is EMFAC 2002. Furthermore, the trip generation rates used in the screening tables are from an older version of the Institute of Transportation Engineers (ITE) Trip Generation Manual. The current version is the seventh.

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 in the Handbook or the current version of the CARB-approved computer model URBEMIS 2002 to estimate the project's construction and operational emissions. The model can be obtained at the SCAQMD website: www.aqmd.gov/ceqa/models.html. If quantification of project emissions reveals that the emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than the thresholds.

2. **Diesel Truck Emissions:** On page 3 of the ND, the lead agency states that there will be a maximum of 14 trucks per hour with each truck carrying 21 tons per load. Given that the plant capacity is 4,000 tons per day and trucks carry a load weighing 21 tons, the proposed project has the potential to generate 190 truck trips per day. If it is assumed that there is a similar number of truck trips bringing raw materials to the site, total heavy-duty truck trips generated by the proposed project would be more than 380 trips per day. The lead agency states on page 14 of the ND that the proposed asphalt plant may result in an increase in traffic but this increase would not be substantial. The lead agency does not provide any data or emission estimates to support this conclusion. Further, CARB has designated diesel particulate as a carcinogen. To demonstrate that the diesel emissions from these trucks will not exceed the cancer risk to sensitive receptors in the vicinity of the project site, especially Columbus High School which is less than 600 feet from the project site, the SCAQMD recommends that the lead agency perform an air toxics health risk analysis of the diesel truck emissions. The SCAQMD has prepared guidance for preparing such an analysis

which can also be accessed at the SCAQMD website:
www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html.

3. **Mitigation Measures:** If a quantitative air quality analysis identifies NO_x emissions exceeding the daily significance thresholds, SCAQMD staff recommends the following measures for consideration by the lead agency where applicable or feasible:
- For all equipment, such as yard tractors, loaders and other service equipment, require the use of alternative clean fuel such as electric or compressed natural gas-powered equipment with oxidation catalysts and particulate traps instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, require the use of 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.
 - Require the use of aqueous or emulsified diesel fuel for all diesel equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16 percent in NO_x and 60 percent in PM₁₀ from diesel exhaust.
 - Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
 - Redirect truck route to avoid residential areas or schools.
 - Use light-colored roof materials to deflect heat.
 - Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency to reduce potentially significant construction and operation emissions can be found in Chapter 11 of the SCAQMD's Handbook.