



South Coast Air Quality Management District

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State of California
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, CA 91201

Draft Environmental Impact Report (Draft EIR) for the Proposed Exide Corporation
Hazardous Waste Facility Permit

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 Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. 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, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC060630-01
Control Number

Operational Emissions

1. In Appendix D Table D-2 On-site/Off-site Vehicle Emissions, the lead agency estimates operational emissions for 80 trucks that deliver spent lead-acid batteries and other lead-bearing scrap to the project site. Normally, these trucks would fall into the heavy-heavy duty weight vehicle class (greater than 33,000 pounds) for the purposes of estimating on-road vehicle emissions using EMFAC2002 emission factors. In Appendix D Table D-2 On-site/Off-site Vehicle Emissions and other applicable tables, however, the lead agency estimates on-road truck emissions using the general delivery truck category EMFAC2002 emission factors. Although the heavy-heavy-duty diesel truck emission factors for CO, PM10, and VOC are lower than the comparable delivery truck emission factors, the emission factors for SO_x are slightly higher and for NO_x are substantially higher. Therefore, at a minimum, the lead agency should revise the air quality analysis for NO_x in the Final EIR using the heavy-heavy-duty category emission EMFAC2002 factors. The heavy-heavy-duty emission factors can be found at the SCAQMD website at the following URL: http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls.

Operational Mitigation Measures

2. Because the operational emission impacts for NO_x and PM10 for the project were concluded to be significant, the lead agency should consider adding the following mitigation measures to further reduce NO_x and PM10 including fugitive dust impacts from the proposed project, if applicable and feasible:

Recommended additions:

Trucks

- Re-route or by restrict truck traffic to avoid certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Enforce truck parking restrictions;
- Develop park and ride programs for employees;
- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
- Restrict operation to “clean” trucks;
- Electrify service equipment facility;
- Use “clean” street sweepers;
- Electrify auxiliary equipment;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.;
- Require or provide incentives to use particulate traps;

Train Idling

- Require or provide incentives for locomotive operators to install an anti-idling device that is set at 15 minutes or less, that is engaged and not tampered with. If anti-idling devices are not installed, require or provide incentives for the locomotive operators to limit idling to 30 minutes or less.

Health Risk Assessment (HRA)

3. The SCAQMD recognizes that the lead agency prepared an HRA according to U.S. EPA's Human Health Risk Assessment Protocol (HHRAP). It is unclear why the lead agency used the HHRAP protocol. SCAQMD staff contacted U.S. EPA and that agency indicated that it does not require the HHRAP protocol to be used for the affected facility. SCAQMD staff recommends that the lead agency perform an HRA pursuant to SCAQMD's recommended HRA protocol because it is based on more conservative assumptions and, therefore, provides more health protective risk management information. The HHRAP differs from SCAQMD HRA protocol primarily in the assumptions built into the models used to calculate health risks. The SCAQMD HRA protocol requires that the HARP model be used to estimate multi-chemical, multi-pathway health risk. The HARP model assumptions differ from the HHRAP model assumptions in the following ways. The SCAQMD protocol requires that residential health risk be based on a 70-year exposure duration. Residential health risk is estimated for adults and children under the HHRAP, which allows exposure durations of 30 years and six years, respectively. The SCAQMD modeling protocol recommends a breathing rate no less than 302 pounds per kilogram-day (Lbs/kg-day) per California Air Resources Board's Office of Environmental Health Hazard Assessment's (ARB's/OEHHA's) guidance. HHRAP uses a breathing rate for an adult equivalent to 216 Lbs/kg-day. Based on these and other differences between HARP and the HHRAP model, the SCAQMD recommends that the lead agency include in the Final EIR an HRA based on current SCAQMD guidance in addition to the health risk estimated according HHRAP.
4. The emission rates, source parameters and receptor grid are the same as those presented in the May 2000 AB2588 Air Toxics Hot Spots Health Risk Assessment, which is based on the emissions reported for the 1999 ATIR inventory year. Based on a review of the toxic data on the SCAQMD website at http://www.aqmd.gov/webappl/fim/prog/facility_details.aspx?fac_id=124838, the 2002 annual lead emissions were 1,198 pounds per year, which is 339 pounds per year greater than the 859 pounds per year reported for 1999. Also 1,198 pounds of ammonia are reported in 2002. No ammonia emissions were reported for previous years. The Final EIR should include an evaluation of more recent emissions data that show the higher emissions. Similarly, the health risk assessment analysis in the Final EIR should evaluate the most conservative annual average emission rate.

5. Detailed methodology/calculations are not include in the 1999 ATIR/2000 HRA, so it is not clear how the diesel truck exhaust particulate emissions were estimated. Diesel truck particulate exhaust emissions were speciated into arsenic, cadmium, chromium, copper, lead, manganese, mercury, nickel, selenium, zinc, and antimony in both the May 2000 AB2588 Air Toxics Hot Spots HRA and the HHRAP analysis. The diesel truck exhaust particulate emissions should be consistent with those estimated in the emission inventory provided in the Draft EIR, which was estimated using EMFAC2002/BURDEN emission factors. It is unlikely that the emissions in the 1999 ATIR/2000 HRA, were estimated using EMFAC2002, since EMFAC2002 was released after the 1999 ATIR/2000 HRA were submitted. The Final EIR should include an HRA with emissions consistent with those presented in the Final EIR emission inventory. In addition, it is not clear if the truck trips between the Draft EIR emission inventory and 1999 ATIR/2000 HRA are consistent. The Draft EIR states that there are 80 trucks that travel 88 miles round trip per day, which is about 1,858,000 miles per year (80 truck/day x 88 mile/round trip x 5 day/week x 22 day/month x 12 month/year). This assumes that diesel trucks only operate five days per week and 22 days per month. If diesel trucks operate more than five days per week and 22 days per month then the miles traveled would be more than 1,858,000 miles per year. The 1999 ATIR/2000 HRA reports that eight sources travel 1,325 miles per year, which would be 10,600 miles per year. The HRA in the Final EIR should be based on diesel truck exhaust particulate emission estimates that are consistent with the diesel truck particulate emissions presented in the emission inventory of the Final EIR.
6. The HRA does not include health risk from locomotive emissions, which are estimated in the Draft EIR emissions inventory. Since SCAQMD policy is to include mobile sources in CEQA analysis, including HRAs, the rail car emissions should be included in the HRA analysis for the Final EIR.
7. SCAQMD mobile health risk assessment guidance requires that carcinogenic risk from diesel exhaust particulate emissions be estimated using the OEHHA cancer potency value for diesel exhaust particulate which is 1.1 (mg/kg-d)⁻¹. Carcinogenic health risk was estimated in the HRA based upon the speciated diesel exhaust components (into arsenic, cadmium, chromium, copper, lead, manganese, mercury, nickel, selenium, zinc, and antimony). The Final EIR should include an updated HRA or demonstrate that the emission inventory in the HRA is consistent with the emissions inventory in the Final EIR. The HRA in the Final EIR should also include health risk based on the OEHHA cancer potency value for diesel particulate exhaust.