South Coast
Air Quality Management District
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135 North "D" Street
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Draft Environmental Impact Report for the Proposed Oakmont Industrial Project

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

RVC070116-03
Control Number

Health Risk Assessment

1. On page 5 of the Revised Health Risk Assessment (Revised HRA), the lead agency states that an EPA idling emission factor was used. EPA has approved EMFAC2002 for on-road emission factor for use in California. Idling emission factors can be generated by setting the speed to zero. The Final EIR/HRA should be prepared using the EMFAC2002 idling-emission factors.

2. On page 5 of the Revised HRA, the lead agency has provided a partial description of the development of the emission rates used in the Revised HRA. There is not enough information, however, to verify the emission rates. For example, it is not clear why the north and south portions of the proposed project have different emission rates. It is also not clear how the gram per second emission rates were developed from the "trucks per dock per week" (i.e., were emissions divided by an eight-hour day, 24-hour day or other duration). Further, the trucks per dock per week values are not presented in the Revised HRA. The Final HRA should describe the development of the emission rates in a fashion that would allow the reader to reproduce the emission rates.

3. On page 6 of the Revised HRA, the lead agency states that the rural air dispersion coefficient was used. Because Health Risk Assessments should be completed according to SCAQMD guidance, the urban air dispersion coefficient is required for all air dispersion modeling in the SCAQMD's jurisdiction. The Final EIR/HRA should be revised to include air dispersion modeling with the urban air dispersion coefficient.

4. In the Revised HRA, PM10 was chosen by the lead agency for the pollutant ID. Under the PM10 option, ISCST3 computes an average of the four highest concentration at each receptor across the number of years of meteorological data being processed. Therefore, the Revised HRA was based on the fourth highest concentration. SCAQMD guidance requires that heath risk be estimated from the maximum concentration (first highest).

   Therefore, the SCAQMD staff suggests that the pollutant ID be set to "Other" and the RECTABLE card in the output pathway be set to the first highest concentration and the air dispersion modeling be revised for the Final HRA/EIR.

5. On page 6 of the Revised HRA, the lead agency states that the calms processing routine was bypassed. However, the air dispersion modeling files reveal that the calms processing routine was used. The calms processing routine must be bypassed when using SCAQMD meteorological data. The Final EIR/HRA should be revised to include air dispersion modeling with the calms processing routine bypassed.

6. The total idling time for each truck trip is five minutes per hour per truck. Five minutes is the maximum time allowed by state regulation for a single idling event. Since trucks may idle at an entrance gate, while waiting for a loading dock, at the loading dock before loading, at the loading dock after loading and again before checking out; SCAQMD staff believes that each diesel truck would idle at least 15 minutes on-site.

   If the lead agency decides to continue using the five minute idle per trip, then a five minute idle per trip restriction should be added as a mitigation measure or as a condition in the land use permit. The Final EIR should either include 15 minutes of idling per trip or a mitigation measure, or a statement that says that a five-minute idle restriction will be placed into the land use permit condition.

Localized Significance Threshold

7. In the Localized Significance Threshold analysis (LST analysis), the rural air dispersion coefficient was used by the lead agency. As stated in comment #6, the Final EIR should be revised to include air dispersion modeling with the urban air dispersion coefficient.

8. In the LST analysis, PM10 was chosen for the pollutant ID. The SCAQMD staff suggests the pollutant ID be set to "Other" and the RECTABLE card in the output pathway set to the first highest concentration and the air dispersion modeling be revised for the Final EIR.

9. The calms processing routine was not bypassed in the LST analysis. The Final EIR/HRA should be revised to include air dispersion modeling with the calms processing routine bypassed.

4. Page 21 of the Revised Air Quality Analysis states that one area source that covered the entire 35.8 acre project site was used. However, according to the modeling file, the area source representing grading does not extend to the property boundary. There is a 25 to 47 meter gap between the boundary of the area source and the property boundary. Because of the gap between the area source and the property boundary, the receptors are further away from the area source than if the area source ended at the property boundary. This is likely to generate lower concentrations at the receptors than if the area source extended to the property boundary. However, a smaller area source allows for less initial dispersion, it is unclear what effect expanding the area source to the entire site will have on the concentrations. In the Final EIR, the air dispersion model should be corrected or the text should be revised to explain why grading will stop 25 to 47 meters short of the property boundary.

5. In the Draft EIR LST analysis, the development of the emission rates is not adequately documented. Although it is assumed that the PM10 emissions were taken from the URBEMIS run; it is not stated in the Air Quality Analysis. In addition, the URBEMIS emission rates for grading were developed assuming that grading would

occur eight hours per day. The emission rates in the air dispersion model, however, were set to 11 hours per day in the variable emission factor card. The operating hours in the air dispersion modeling in the Final EIR should be consistent with the source of the emission rates.

The Final EIR should thoroughly explain the development of the emission rates. The sources of the emission rates and equations should be included in the Final EIR.

6. In the Draft EIR LST analysis, variable emission factors limited the analysis to the spring season (March – May). Since actual construction is often delayed, limiting the analysis to a single season may be too restrictive. By limiting the season to the spring season, only meteorology between March and the end of May is used for the analysis. If grading is delayed into the summer, the analysis may not adequately capture the effects of the worst meteorology in the summer. Since the concentrations at the receptors during other seasons are not known, the Final EIR should include a mitigation measure limiting grading to before June 2007 or the analysis should be revised to include an analysis of the worst-case meteorology, i.e., summer.

7. If URBEMIS is the source of the emission rates for the LST air dispersion modeling, the area source is not representative of the activity. The criteria emissions developed in URBEMIS are for a maximum disturbed area of 9.1 acres (25 percent of the total area of 35.8 acres). It would be incorrect to use a 35.8-acre area source for emissions generated from 9.1 acres of disturbed area. If URBEMIS is the source of the emission rates, then the analysis should be revised and the site should be modeled for each of the four 9.1 acre area sources in the Final EIR. The greatest concentrations should be used for the significance determination.

Mitigation Measures for Operational Air Quality Impacts

8. Because project-specific cancer and non-cancer risks are above significance levels and operational air quality impacts from the proposed project are estimated to exceed the NOx daily significance thresholds, the SCAQMD recommends that the lead agency consider the following modifications and additional mitigation measures to further reduce project-specific health risks and operational air quality impacts from the project:

The bullet points on page 5.10-20 should be required as mitigation measures and revised as follows:

- ~~Restrict truck idling during project operating hours when feasible~~ Prohibit all vehicles from idling in excess of five minutes, both on-site and off-site;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps or alternative fueled off-road equipment;
- Enforce any local truck parking restrictions ~~during project operating hours~~; Note: Ultra-low sulfur diesel is now required to be used for stationary and mobile sources.

Recommended Additions:

- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the warehouse/distribution center 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 warehouse/distribution center to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Re-route truck traffic by restricting truck traffic on certain sensitive routes;
- Restrict overnight parking in residential areas;
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight;
- Establish area(s) within the facility for repair needs.
- 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 facilities;
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;