South Coast
Air Quality Management District
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FAXED: JUNE 15, 2007 June 15, 2007

Ms. Joann Lombardo, Contract Planner
City of Perris
Department of Community Development and Planning
135 North D Street
Perris, CA 92572

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Condition Use Permit 06-0158**

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 Draft Mitigated Negative Declaration.

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

RVC070522-08
Control Number

**Mobile Source Impacts**

1. Review of the emission factors used to calculate heavy-duty truck trip emissions indicate that the weighted delivery truck emission factors from the SCAQMD webpage were used. These factors are a weighted factor derived from all heavy-duty truck classes, e.g., light-, medium-, and heavy-heavy-duty trucks. Since it is likely that all transfer and collection trucks will be heavy-heavy-duty trucks, it is recommended that emissions for these vehicles be calculated using the heavy-heavy-duty truck emission factors, which can be found at the following web address: http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls .

**Localized Significance Thresholds**

2. Because the proposed site is located less than a quarter-mile from an existing multi-family residences to the north and single-family residences to the west, the SCAQMD recommends that a localized air quality analysis be prepared to ensure that the these residents are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: http://www.aqmd.gov/ceqa/handbook/LST/LST.html .

**PM2.5 Significance Thresholds**

3. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

**Health Risk Assessment**

4. On page 18 in Section III. Air Quality, there is a general discussion of diesel emissions from the projected increase in diesel equipment from 306 to 512 diesel-powered vehicles , e.g., transfer vehicles, waste collection trucks, smaller haul trucks, etc., for the expansion at the existing project site. The lead agency does mention cancer risk, but cancer risks from the project have not been calculated. Since there are sensitive receptors located immediately north and west of the expansion site and diesel particulates have been designated as a carcinogen, the SCAQMD therefore recommends that cancer risks be calculated since it appears that the proposed project

will increase diesel particulate emissions at this site from trucks queuing and idling. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from the AQMD's CEQA web pages at the following URL: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc

**Mitigation Measures – Operation**

5. Because residential sensitive receptors located immediately north and west of the proposed expansion at the existing TS/MRF project site (see also comment #1) will experience a substantial increase in heavy-duty diesel-powered truck and other haul-vehicle traffic coming to the site, queuing and idling, those sensitive receptors will experience a substantial increase in long-term (operational) localized air quality impacts (see comment #2). The SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce operational air quality impacts from the project, if applicable and feasible:

   $NO_x$ – Recommended Additions:

   - Provide minimum buffer zone of 300 meters between truck traffic and sensitive receptors;
   - Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
   - Enforce truck parking restrictions;
   - Restrict truck idling;
   - Restrict operation to "clean" trucks;
   - Electrify service equipment facility;
   - Use "clean" street sweepers for dust created by truck track out;
   - Pave road and road shoulders;
   - Conduct air quality monitoring at sensitive receptors; and
   - Accelerate the conversion of Waste Management fleets to alternative clean fueled vehicles;
   - Replace off-road mobile source equipment with alternative clean fueled equipment.

**Odor Management Plan**

6. Based on the project description, the project proponent proposes to increase the daily permitted tonnage of all wastes and recyclable materials by more than 1,000 tons per day, which, if granted after October 2006, would make the permit subject to SCAQMD Rule 410 – Odors From Transfer Stations and Material Recovery Facilities. Compliance with SCAQMD Rule 410 would include the requirement for the owner or operator of the facility to submit to the Executive Officer of the SCAQMD a Rule 410 Odor Management Plan and, potentially, could include strict design requirements for the enclosure. The owner or operator would also need to

demonstrate compliance with applicable design requirements for the proposed ventilation system before increasing the amount of daily waste being handled.