



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

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Mr. Matthew Bassi, Planning Manager  
City of Pomona, Planning Department  
505 S. Garvey Avenue  
Pomona, CA 91766

## **Draft Environmental Impact Report (Draft EIR) for the Proposed First Street Waste Transfer Station**

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

LAC070220-04  
Control Number

### **Localized Significance Thresholds**

1. Because the proposed site is located less than a quarter-mile from an existing high school and elementary school complex to the north and a mobile home park directly south, the SCAQMD recommends that a localized air quality analysis be prepared to ensure that the students, faculty and staff in the existing school complex and the mobile park 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**

2. 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](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](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

### **CO Hotspots Analysis**

3. In the Draft EIR, the lead agency has noted that the intersection of East End Avenue (NS) at Mission Boulevard (EW) listed in Table 5-6 on page 5-20 in Appendix G shows a decline in the level of service in the AM and PM Peak Hours that would warrant a CO hotspots analysis. The SCAQMD recommends performing a CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse or if the LOS declines from C to D.

Please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address:  
<http://www.dot.ca.gov/hq/env/air/coprot/htm> .

### **Health Risk Assessment**

4. On page 2-7 in Section 2.5, the lead agency states that daily traffic to the site is estimated to be 187 commercial collection trucks, 65 heavy-duty transfer trucks, and

25 employee vehicle trips. On page 3.2-17, Section 3.2.2.2 and in the URBEMIS output sheets, the lead agency states that the maximum daily trip generation is 579 municipal solid waste (MSW) commercial collection trucks and 204 heavy-duty transfer trucks. On page 3.11-16, Section 3.11.3.1.1, the lead agency states that 874 daily truck trips would be generated by the proposed project [227 transfer truck trips (26 percent of the total truck trips) and 647 collection truck trips (74 percent of truck trips)]. The sheet entitled "Calculate On-site Diesel Particulate Matter (DPM) Emissions from Trucks" in Appendix C estimates emissions for 65 annual average trips per day from transfer trucks and 187 annual average trips per day for solid waste collection vehicles (SWCV) for use in the HRA. Since the "Calculate On-site Diesel Particulate Matter (DPM) Emissions from Trucks" sheet presents operations occurring seven days per week, it appears that the HRA was not based on worst-case activity. The correct truck trip values should be consistent throughout the Final EIR. Finally, the Final EIR should be revised to include health risks estimated using the correct trip rates for the proposed project.

5. The running diesel particulate matter (DPM) emissions from SWCV were estimated using an emission factor of 0.01 gram per mile, which is referenced as based on CARB SWCV regulation in the sheet entitled "Calculate On-site Diesel Particulate Matter (DPM) Emissions from Trucks" in Appendix C. The units for the emission factor are incorrect. The CARB SWCV regulation emission factor is 0.01 gram per brake-horse power hour not grams per mile. Therefore, the running emissions are underestimated by the horsepower rating of the trucks, which could potentially increase emissions by two orders of magnitude. The Final HRA should be revised based on corrected running DPM emissions factor.
6. SWCV DPM idling emissions from SWCV were estimated based on an emission factor of 0.01 grams per hour in the sheet entitled "Calculate On-site Diesel Particulate Matter (DPM) Emissions from Trucks" in Appendix C. It appears that the 0.01 value is in error, because the emission factor from EMFAC2002 is presented above the equation is 1.004 grams per hour. Therefore, the SWCV DPM idling emissions are under estimated by two orders of magnitude. The Final HRA should be based on corrected idling DPM emissions.

### **Construction Mitigation Measures**

7. Because the construction air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for nitrogen oxide (NOx), the SCAQMD recommends that the lead agency consider adding the following mitigation measures to those listed in Table 6-1 Required Mitigation Measures (Construction) in Section 6.0 on page 6-1 to further reduce construction air quality impacts from the project, if applicable and feasible:
  - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Use alternative clean fueled off-road equipment or give extra points in the bidding process for contractors committing to use such equipment;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require construction equipment that meet or exceed Tier 2 standards; use emulsified diesel fuels; and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified technologies, etc.;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Reroute construction haul trucks away from congested streets or sensitive receptor areas; and
- Improve traffic flow by signal synchronization.

### **Operational Mitigation Measures**

8. Because project-specific operational air quality impacts from the proposed project are estimated to exceed the NO<sub>x</sub> daily significance threshold, 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, if applicable and feasible:

#### Recommended Additions:

- Design the facility so that entrances and exits do not result in trucks traversing past neighbors or other sensitive receptors;
- Design the facility 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 facility 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;
- Require street sweepers that comply with SCAQMD Rules 1186 and 1186.1 to handle spilled debris around the proposed facility; and
- Conduct air quality monitoring at sensitive receptors.

### **Odor Mitigation Measures for Operational Air Quality Impacts**

9. In the Final EIR, the lead agency should state that the proposed project would be subject to SCAQMD Rule 410 - Odors From Transfer Stations and Material Recovery Facilities, since the facility operators are proposing to increase the facility permitted throughput capacity by 1,350 tons per day or more. In addition, the lead agency should clarify in the Final EIR whether the facility is located greater than 1,000 feet

from any property zoned for residential or mixed land use, or designated as a site for a school or a school under construction, measured from the side of the odor generating source located nearest to the area zoned for residential or mixed land use or school to the closest property line of that receptor. From the project description and satellite imagery from the web, there are two sensitive receptor sites that appear to be located within 1,000 feet from the proposed site: an existing 66-unit mobile home park directly south of the proposed site, and to the north, separated by railroad tracks, is the Pomona Unified School District (PUSD) Village High/Pueblo Elementary School complex. If there are sensitive receptors located less than 1,000 feet, there are detailed building and ventilation design and operational requirements that must be met in Rule 410. Permitting and compliance questions regarding SCAQMD Rule 410 can be directed to SCAQMD staff at (909) 396-2684.

10. Under proposed Mitigation Measure AQ-11, the SCAQMD staff is concerned that the proposal to utilize an odor control system could actually worsen air quality and cause odor nuisances. An ineffectively designed odor control system might not effectively neutralize odors from the facility prior to release. In addition, some odor control products contain volatile organic compounds which, upon release, become ozone precursors, while other products contain salts which, upon release, are particulate matter. SCAQMD staff has responded to complaints caused by facilities using odor control products containing fragrances which are considered by some as objectionable.