



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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County of Los Angeles Department of Public Works

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Draft Environmental Impact Report (Draft EIR) for the Proposed United Rock Quarry No. 3 Project/Buena Vista SPS (SCH No. 2016051042)

The South Coast Air Quality Management District (SCAQMD) staff 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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to use the former United Rock Quarry No. 3 as a permanent placement location for sediment removed from reservoirs, debris basins, spreading grounds, and other (Proposed Project). Placement of sediment would occur for approximately 50 years and the proposed operations would be intermittent. United Rock Quarry No. 3 is approximately 100 acres. During normal sediment placement operations, peak truck trips to the Project site would include 400 round trip truck trips per day. Based on a review of aerial photographs, the Proposed Project is bounded by residential uses to the north and west and industrial uses to the south and east.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the Proposed Project's operational air quality impacts from NO_x emissions would be significant and unavoidable after incorporating Mitigation Measure Air-1 through Mitigation Measure Air-5¹. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 5 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk². SCAQMD staff has concerns about the air quality and HRA analyses in the Draft EIR. The analysis utilized assumptions which have likely led to an under-estimation of the Proposed Project's health risks. Please see the attachment for more information.

¹ Draft EIR. Section 3.1 – Air Quality.

² Draft EIR. Table 3.1-15 – Mitigated Cancer Risk and Chronic Hazards.

Pursuant to the California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

LAC171214-05

Control Number

ATTACHMENT

Health Risk Assessment (HRA)

1. On-site idling is reasonably foreseeable. On-site idling emissions should include 15 minutes of idling to ensure that emissions from idling are properly analyzed and potential health impacts from idling are disclosed in the Final EIR. While the Lead Agency is committed to restricting idling to five minutes or less pursuant to the California Air Resources Board Rule 2449³, the 15-minute idling is a more realistic representation of the idling activities and serves as a conservative estimate of impacts from idling. The 15-minute idling includes emissions generated when entering the Proposed Project site; idling at the scales; and emissions generated when leaving the Proposed Project. Therefore, SCAQMD staff recommends that the Lead Agency use 15 minutes of idling as a modeling parameter to calculate emissions and associated health risks.
2. In the Health Risk Assessment methodology discussion, emission rates for the AERMOD model were based on unitized 1 gram per second⁴. However, in the AERMOD dispersion modeling, sources used a 3 gram per second emission factor. SCAQMD staff recommends revising the emission rates to ensure consistency.

Compliance with SCAQMD Rule 403(e) – Large Operations

3. The Proposed Project is a large operation on 100 acres (50 acres or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations⁵. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class⁶. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 403(e) in the Final EIR.

³ Draft EIR. Mitigation Measure Air-1 through Mitigation Measure Air-5.

⁴ Digital File – UR Health Risk Assessment September 2017.docx.

⁵ South Coast Air Quality Management District. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁶ South Coast Air Quality Management District Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.