



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Consolidated Ready Mix Project (SCH No.: 2019089019)

South Coast Air Quality Management District (South Coast AQMD) 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 MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish two existing structures totaling 1,800 square feet, build an eight-foot masonry wall, a chain link fence, and washout pits, and install two mixing materials storage tanks on 39,519 square feet (Proposed Project). The Proposed Project is located at 162 North Aspan Avenue near the northeast corner of North Aspan Avenue and West 1st Street. Construction is expected to last six months¹. Operation of the Proposed Project would produce a daily average of 50 yards of concrete, with a maximum daily output of 125 yards².

South Coast AQMD Staff's Summary of Air Quality and Health Risk Assessment Analyses

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant, after the implementation of dust control measures, such as a conveyor misting system that reduces fugitive dust emissions by 62 percent and a three-sided baghouse that reduces fugitive dust emissions by 75 percent³.

The Lead Agency also performed a health risk assessment (HRA) analysis for the Proposed Project's operational activities and found that the maximum incremental cancer risk would be 8.52 in one million⁴ at the Proposed Project's fence line, which is below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk. Furthermore, the Lead Agency identified the South Coast AQMD as a public agency whose approval is required for the Proposed Project⁵.

South Coast AQMD Staff's Comments on the Health Risk Assessment Analysis

After a review of the HRA analysis and supporting technical documents, South Coast AQMD staff is concerned about the HRA analysis in the MND. First, the modeling performed for the Proposed Project used improper parameters. Second, while the Lead Agency evaluated the Proposed Project's cancer risk from multiple exposure pathways, cancer risk from the homegrown produce pathway was not evaluated.

¹ MND. Page 6.

² *Ibid.* Page 6.

³ *Ibid.* Page 22.

⁴ *Ibid.* Page 24.

⁵ *Ibid.* Page 7.

These have likely underestimated the Proposed Project's health risk impacts in the MND. Detailed comments are as follows.

1. The Lead Agency initially used a 100-meter receptor grid at the ground level to identify the location of the point of maximum impact (PMI) from Proposed Project's operation along the fence line. However, "sensitive receptors were placed at a breathing height of 1.8 meters⁶ above ground level (AGL)⁷." Flagpole receptors are only necessary for analyses that have instances where sensitive receptors are located on patios/decks at nearby high-rise apartment buildings⁸. Receptors should be set to a default height of 0.0 meter, so that ground-level concentrations are analyzed⁹. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the HRA and use the default 0.0 meter flagpole height in AERMOD or provide a rationale to justify the use of 1.8 meters.
2. The Lead Agency modeled the Proposed Project's operational emissions during the hours of operation (Monday through Friday 5:00AM-6:00PM; Saturday 5:00AM-11:00AM; Sunday 6:00AM-9:00AM), which would equal to 74 hours of operation per week, rather than assuming continuous operations. The Lead Agency also used an improper emission scalar when modeling the variable emissions. South Coast AQMD staff recommends sources be modeled as continuous operations (24 hours/day, seven days/week, and 52 weeks/year) by using the default emission rate of 1g/s, 24 hours a day, for 365 days a year in AERMOD to estimate the Proposed Project's chronic and cancer risks during operation. Alternatively, if there are permit conditions that restrict the operating hours, the Lead Agency should revise the variable emission scalar in AERMOD. Since continuous operations over seven days a week result in 168 hours (24 hours multiplied by seven days), a variable emissions scenario should account for 168 hours of operation, rather than only 74 hours. Therefore, the Lead Agency should use 2.3 instead of 1 for each hour of operation (168 hours divided by 74 hours) and 0 for each hour of nonoperation in AERMOD.
3. The Lead Agency used the Hotspots Analysis and Reporting Program 2 (HARP2) software to calculate the Proposed Project's cancer risk. When calculating cancer risk in HARP2, users can select among multiple exposure pathways. Here, the Lead Agency selected the following exposure pathways: inhalation, dermal, soil ingestion, and mother's milk in HARP2. Since exposures from ingestion from soil and food such as mother's milk were selected, the Lead Agency should also select homegrown produce as another pathway for exposure through ingestion and re-calculate the Proposed Project's cancer risk in the Final MND, or provide a rationale to justify why the homegrown produce pathway was not selected.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

⁶ The Lead Agency reported a flagpole receptor height of 1.8 meters above ground level but used a flagpole receptor height of 1.2 meters above ground level in the air dispersion modeling.

⁷ MND. Appendix A, *Air Quality and Green House Gas Analysis*. Page 18.

⁸ South Coast AQMD Modeling Guidance for AERMOD. Accessed at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Flagpole>.

⁹ *Ibid.*

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

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Planning, Rule Development & Area Sources

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