South Coast
Air Quality Management District
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FAXED: AUGUST 16, 2005

August 16, 2005

Ms. Adrienne Ng
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Ng:

Initial Study/Mitigated Negative Declaration (IS/MND) for the City Terrace (Fishburn Avenue) Recycling and Waste Transfer Station Project No. R2005-1533 (July 2005)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. As a possible responsible agency for the proposed project, the SCAQMD would use the MND prepared by the lead agency as the CEQA document for any subsequent SCAQMD permit applications. Because the air quality analysis prepared by the lead agency neglects or underestimates emissions from a number of emission sources, it is likely that the SCAQMD will not be able to use this MND for future permitting. Based on the attached comments, the SCAQMD requests that the air quality analysis be revised and recirculated for public comment pursuant to CEQA Guidelines Section 15073.5.

Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB
LAC050715-05
Control Number

**Initial Study/Mitigated Negative Declaration (IS/MND)
for the City Terrace (Fishburn Avenue)
Recycling and Waste Transfer Station**

1. **Project Construction Emissions**: The lead agency fails to calculate demolition and construction emissions related to the proposed project in the MND. For example, the proposed project includes the demolition of a covered recycling area at the southwest corner of the property, and the construction of a new 6,600 square-foot processing building. The lead agency does not provide any information on the type and number of demolition and construction equipment that would be used at the site and the emission factors that would be used to estimate the emissions that would be generated during this phase of the project. It is recommended that the lead agency quantify construction and demolition emissions using the methodologies in the SCAQMD CEQA Air Quality Handbook. Alternatively, the lead agency may consider using California Air Resources Board (CARB) - approved URBEMIS 2002 model, using one of the industrial land use categories as a surrogate for the recycling and waste transfer station. The URBEMIS 2002 model may be found online at the SCAQMD website at: www.aqmd.gov/ceqa/models.html.

2. **Project Baseline Emissions**: The analysis of operational emissions is deficient for a number of reasons. First, the facility is an existing facility, but baseline emissions from the facility have not been calculated. For example, it is not clear if the off-road construction equipment identified on page 1 of the Initial Study, e.g., two caterpillar 320 CLU excavators, one Caterpillar IT914 loader, one forklift, and two loaders, is existing equipment or new equipment. If these are existing equipment, daily emissions should be calculated to establish the baseline. If any of these pieces of equipment will be new equipment, then emissions should calculated as part of the operational air quality impacts. This information, including emissions factors, hours of operation of all site equipment, etc., should be presented for review in the MND. The information may be presented in the text or the appendix. This information will help fully account for operational emissions as well as facilitate review of the analysis of the air quality impacts of the proposed project.

3. **Regional versus Local Emissions**: On page seven of the Technical Note, the lead agency states that "the proposed expansion will result in additional truck trips to the facility." The lead agency states further, "Emissions from trucks that transport waste to the facility are not considered new emissions since the additional material would be transported to other facilities." The SCAQMD rejects this rationale because even if it is assumed that the waste transport trips could go to other facilities, the expanded facility would then be able to accommodate new trips resulting from population growth, etc. Consequently, truck trips to the expanded facility should be considered new trips. Furthermore, although the lead agency calculates emissions for the new truck trips, 105 round trips, the lead agency only calculates emissions for one mile of each one-way trip. For the purposes of a localized analysis, this approach

may be acceptable. However, for the purposes of a regional analysis, this approach substantially underestimates total project emissions. Therefore, the SCAQMD requests that the lead agency calculate mobile source emissions using the entire trip length for each one-way trip, not just one mile. The net emissions should then be compared to the significance thresholds for the criteria pollutants to determine whether or not those net emissions are significant. SCAQMD staff recommends that the table on page six of the Technical Note be expanded to include the baseline and projected emissions for the Final MND.

4. **Diesel Trucks Idling Emission Factor**: The idling emission factor for diesel engines manufactured in 2007 from CARB's Public Hearing to Consider the Adoption of Heavy-Duty Vehicle Idling Emission Reduction Requirements Staff Report (December 5, 2003), 0.15 gram per hour, was used in the HRA. This emission factor is the emission factor for the specific year 2007 engine category rather than the fleet average, which would be substantially higher. The HRA should be completed with the fleet average EMFAC2002 idling emission factor for the first year of operation, which would be conservative. Alternatively, the fleet average EMFAC2002 idling emission factor for each year from the first year of operation to seventy years after the start of operation can be averaged, then used in the HRA. The idling emission factor can be estimated by EMFAC2002 by including a vehicle speed of zero miles per hour. EMFAC2002 will provide the fleet average PM10 idling emission factor in grams per hour for trucks. The final CEQA document should include an HRA with idling emission factors calculated as described above.

5. **Existing or New Vehicle Trips**: On page six of the Technical Note, it is indicated that the proposed project would result in an additional 105 trucks per day traveling to and from the project site. On page seven of the same document, it is stated that a total of 105 trucks would visit the facility on a daily basis. The lead agency needs to clarify, in the MND, whether the 105 trucks represent the total number of new trucks visiting the project site or some portion of this total represents new trips.

6. **Overall Project Emissions**: On page five of the Technical Note, PM10 emissions from material handling is calculated and compared to the PM10 regional significance criterion of 150 pounds per day. Similarly, combustion emissions from new truck trips associated with the proposed project (although underestimated see comment # 3) are calculated separately and compared to the applicable regional significance thresholds. This approach inappropriately minimizes emissions that are compared to the regional significance thresholds. Instead, the lead agency should calculate emissions from all sources, sum all like pollutants, e.g., all CO emissions, all PM10 emissions, etc., and then compare the summed emissions to the regional significance thresholds.

6. **Health Risk Assessment (HRA):** HRAs for diesel exhaust particulates should be completed according to the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This guidance can be downloaded from the SCAQMD website at:

www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. Dispersion modeling was completed with the EPA regulatory defaults. SCAQMD requires that dispersion modelers bypass the calm processing routine option. The HRA should contain dispersion modeling with no-calm processing routine and no stack-tip downwash options.

No information was provided on why a release height of five meters from the area source was selected. The final CEQA document should justify the five meter release height.

Fence-line receptors were not included in the air dispersion model. The SCAQMD Guidance document requires that fence-line receptors be included in the determination of adverse air quality impacts. The final CEQA document should include the HRA based on air dispersion modeling with fence-line receptors.

SCAQMD HRA Guidance document also requests a cancer risk isopleth map showing risk contours of 1, 10, and 25 in a million should be included in the impact assessment. The final CEQA document should include the cancer risk isopleth map as described above.

7. **Odor Complaints and Mitigation**: According to SCAQMD records, though the facility has been at this location for only seven months, there have been three odor complaints so far. The closest residences are within ½-mile from the transfer station. SCAQMD staff is concerned about increased odor nuisance from the transfer station if the proposed expansion goes through without the lead agency instituting odor mitigations. SCAQMD staff recommends that the lead agency implement the following mitigation measures where feasible:

a. Institute water spray for unloading and loading of soil, cement and other dry particulate loads.
b. Use portable sprayers to control more localized dust sources, including construction and demolition material, e.g., wall board.
c. Use portable sprays with deodorants on odorous materials, especially organic materials including food wastes.
d. Use a bleach solution to clean off the tipping floor once a day.
e. Install an overhead deodorizing misting system over the part of the facility where the municipal solid waste material is dumped and/or stored.