South Coast
Air Quality Management District
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FAXED: May 20, 2005

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Ms. Paula Kelly
City of Irwindale
Department of Planning
5050 North Irwindale Avenue
Irwindale, CA 91706

Dear Ms. Kelly:

Draft Environmental Impact Report (DEIR) for the Hanson Aggregates Proposed Mining and Reclamation Project: City of Irwindale
February 2005

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated in 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 certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Feel free to call me at (909) 396-3105 if you have any questions regarding these comments.

Sincerely

Susan Nakamura
Program and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:SS:CB

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1. **Operational Equipment Emissions**: The SCAQMD staff is concerned that the air quality impacts presented in Section 3A.4.3 underestimate the operational emissions from the proposed project. The operational emissions presented in Section 3A.4.3 should include all emission sources that would occur during the operational phases of the project. Emission sources include, but are not limited to, stationary and portable equipment and process related emissions, fugitive dust emissions, and on-road mobile sources and off-road mobile sources that are associated with the project. The SCAQMD staff recommends that the lead agency add the unmitigated fugitive dust emissions presented in Table 3A-6 to the vehicular emissions in Tables 3A-3, 3A-4 and 3A-5 for the three project phases to obtain peak daily emissions from all emissions sources. In addition, any other stationary emission sources associated with the operation of the proposed project should be quantified and included in Tables 3A-3, 3A-4, and 3A-5.

   The operational emissions should be based on the peak daily emissions that could occur from each phase of the project, and any overlapping phases of the project. For example, Phase I of the proposed project assumes that there would be 540, 40-mile round trip truck trips each year from 2005 to 2010. The peak daily emissions should be based on 2005 emissions as the vehicle fleet in 2005 is expected to generate more emissions than the vehicle fleet in 2018. Emission factors in the EMFAC2002 model assume that each year the overall emissions from on-road vehicles will decrease as on-road vehicles become cleaner over time.

   The lead agency does not provide enough data to evaluate the emissions presented in the Tables 3A-3, 3A-4, and 3A-5. To facilitate review of project emissions, the lead agency needs to provide a breakdown and list of equipment, both stationary and mobile, that is being used for the mining operation. A similar breakdown and listing of stationary and off-road equipment that would be used for reclamation activities at the site should also be provided. The lead agency also needs to present for review, either in the text or the appendix, the emission factors and the hours of operation that were used to estimate the equipment emissions. It is not sufficient to state that the emission factors were taken from CARB's Off-Road Model since CARB's emissions factors are specific to the year and vehicle mix for which they are issued. The SCAQMD's website includes annual composite off-road emission factors based on CARB's Off-Road Model.

2. **Mitigation Measures**: Tables 3A-3, 3A-4, 3A-5 and 3A-6 show that NO_X and PM10 operational emissions substantially exceed the significance thresholds. The SCAQMD staff strongly urges the lead agency to consider the following mitigation measures to reduce these NO_X and PM10 emissions. In addition, the SCAQMD staff

requests that lead agency include a discussion in the Final EIR an explanation of why a mitigation measure is infeasible and the reason(s) the measure cannot be implemented:

- Ensure that trucks are scheduled for pick up only when the aggregates are ready for loading.
- Ensure that there is no queuing of trucks outside of the confines of the facility boundaries.
- Restrict truck idling to less than ten minutes.
- Require or provide incentives to truck operators to use low-sulfur diesel fuel, as defined in SCAQMD Rule 431.2, i.e., diesel with 15 ppm sulfur content.
- Provide incentives or establish a policy to require truck operators to operate trucks that are properly tuned and maintained.
- Provide incentives to truck operators to use newer, lower-emitting trucks.
- Provide incentives to truck operators to install after treatment control technologies such as diesel oxidation catalyst, particulate filters, alternative diesel fuels such as emulsified diesel fuel, or implementation of innovative engine designs such as timing and fuel ratio modifications.
- Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes.
- Improve traffic flow by signal synchronization.
- Electrify service equipment at the facility.
- Have an environmental coordinator on-site to immediately report problems to project manager or respective agencies, and ensure mitigation measures are implemented.
- Require all trucks hauling loose materials to be covered with a tarp or other suitable cover.
- Prior to hauling, check bell-dump truck seals regularly, and any trapped rocks be removed to prevent spillage of soil or debris.

3. **Air Quality Management Plan (AQMP)**: The lead agency states that the most recent AQMP is the 1997 AQMP with the 1999 Amendment. Please note that the SCAQMD board adopted the 2003 AQMP in August 2003 and California Air Resources Board (CARB) approved the plan in October 2003. So for planning purposes, the 2003 AQMP is currently the applicable plan. This information should be updated in the Final EIR.

4. **SCAQMD Rule 1157**: On January 7, 2005, the SCAQMD adopted Rule 1157 – PM10 Emission Reductions from Aggregate and Related Operations. This rule will reduce PM10 emissions by controlling fugitive dust from a variety of potential sources such as conveyors, crushers, screens, storage piles, haul roads etc. The rule becomes effective July 1, 2005. The project should be aware that this rule may impose PM10 control requirements for specific components of the proposed project.

5. **Mislabeled Tables (Editorial)**: The tables identified in the third paragraph on page 3A-14 appear to be mislabeled.

6. **CO Hotspots Protocol**: The CO hotspots modeling should be completed according to the Transportation Project-Level Carbon Monoxide Protocol, UCD-ITS-RR-97-21, ITS UC Davis, December 1997 (CO Protocol). However, EMFAC2002 emission factors should be used in place of EMFAC7F emission factors. According to the CO Protocol, projects that result in the worsening of a signalized intersection LOS to E or F should complete at least a screening analysis.

7. **Traffic Volumes:** It is not clear from the EIR whether traffic volumes are greater or equal to 1,000 vehicles per hour per lane. If traffic volumes are greater or equal to 1,000 vehicles per hour per lane, a detailed analysis should be prepared according to the CO Protocol (see Appendix B) with EMFAC2002 emission factors. If the traffic volumes are less than 1,000 vehicles per hour per lane, the screening analysis should be updated to be consistent with the CO Protocol. Sufficient documentation should be provided in the Final EIR to allow the reader to verify that the CO Protocol was followed correctly.

8. **Post Reclamation CO Analysis:** The CO hotspots analysis was limited to the post reclamation year 2036. By completing the CO hotspots analysis only for traffic in 2036, the lead agency completed its analysis using the cleanest vehicle fleet average. The CO Protocol states that impacts should be examined the year that the traffic stabilizes. Since dredging would stop in July 2005 without the project, and traffic patterns are stable under existing conditions; the first stable year would be 2005. Therefore, the CO hotspots analysis should examine CO impacts based on 2005 traffic volumes. CO impacts should also be examined for any significant change in traffic volumes, when the change occurs. The traffic analysis states that truck traffic would be at a maximum in 2030. Therefore, CO impacts in 2030 should be examined as well. Since a worst-case analysis would examine impacts from changes to traffic volumes at the time they occur, analysis should be provided on impacts as truck traffic from the project increases between 2005 and 2030.