



South Coast Air Quality Management District

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FAXED: NOVEMBER 2, 2005

November 2, 2005

Mr. Samuel Kevin Wilson
City of Vernon
Community Services & Water
4305 Santa Fe Avenue
Vernon, CA 90058

Dear Mr. Wilson:

**Negative Declaration for Baker Commodities, Inc:
3001 Sierra Pine Avenue, Vernon**

The South Coast Air Quality Management District (SCAQMD) has reviewed the Negative Declaration for the proposed project and, in addition to the attached comments offers the following. The lead agency has not quantified construction or operational air quality impacts for the proposed project. Since the SCAQMD is likely a responsible agency for portions of the proposed project, the Negative Declaration is inadequate for the purposes of the SCAQMD's permit application process. As a result, the lead agency should revise the air quality analysis by quantifying construction and operational air quality impacts and recirculating the Negative Declaration pursuant to CEQA Guidelines Section 15073.5.

The lead agency has only circulated the Negative Declaration for a 20-day public review and comment period. Since the lead agency did not contact the SCAQMD regarding the shortened review period prior to the start of the comment period, the lead agency has not complied with the criteria for shortened review in Appendix K of the CEQA Guidelines.

The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. 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
LAC051020-4
Control Number

**Negative Declaration for Baker Commodities, Inc.
3001 Sierra Pine Avenue, Vernon**

1. **Project Air Quality Emissions:** The applicant is proposing to construct and operate a temporary recycled materials processing facility which will operate for two years, and also construct a 176,490 square-foot cold storage facility at the site. The lead agency, however, does not provide any data on emissions from either project to demonstrate that no air quality violations will occur as a result of these concurrent projects. Please note that without providing a quantitative analysis of potential emissions from construction and operation using the analysis methodologies in the AQMD 1993 CEQA Air Quality Handbook (Handbook) or other approved methodologies, the lead agency has not demonstrated that the project's air quality impacts are not significant. Alternatively, the lead agency may consider using California Air Resources Board (CARB) computer model URBEMIS 2002 to estimate the project's construction and operational emissions. The model can be obtained at the SCAQMD website: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that the project's emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than the thresholds.

2. **Diesel Truck Emissions:** It is expected that materials to be recycled will be transported to the facility in heavy-duty diesel transport trucks. Further, at buildout the 176,490 square foot cold storage facility will attract truck traffic. California Air Resources Board (CARB) has designated diesel particulates as a carcinogen. The lead agency does not provide any data regarding the volume of truck traffic and what the air quality impacts are going to be on the roadways along the truck routes and the sensitive receptors in the vicinity of the project. To demonstrate that the diesel emissions will not exceed the cancer risk to sensitive receptors along the routes or close to the facility, the SCAQMD recommends that the lead agency perform an air toxics health risk analysis of the diesel truck emissions. The SCAQMD has prepared interim guidance for preparing such an analysis which can also be accessed at the SCAQMD website: www.aqmd.gov/ceqa/handbook/diesel_analysis.doc under Health Risk Assessment.

3. **Mitigation Measures:** If a quantitative air quality analysis identifies any criteria pollutant emissions greater than the daily significance thresholds recommended for use by the SCAQMD, the following measures are recommended for the lead agency to consider where applicable or feasible:
 - Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
 - Require the use of alternative clean fuel such as electric or compressed natural gas-powered construction equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO_x emissions by 50 percent.

- Require the use of emulsified diesel fuel for construction equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16% in NO_x and 60% in PM₁₀ from diesel exhaust.
- Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
- Use alternative-fueled yard tractors.
- Enforce truck parking restrictions.
- Redirect truck route to avoid residential areas or schools.
- Improve traffic flow through signal synchronization.
- Provide electrical sources for service equipment and docking of trucks.
- Use light-colored roof materials to deflect heat.
- Install solar panels on roof to supply electricity for air conditioning.
- Use double-paned windows to reduce thermal loss.
- Install central water heating systems to reduce energy consumption, and
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the SCAQMD's Handbook.