South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

**FAXED: JULY 14, 2006**

July 14, 2006

Ms. Angela Reynolds
City of Long Beach
Department of Planning and Building
333 West Ocean Boulevard, 7th Floor
Long Beach, CA 90802

**Recirculated Draft Environmental Impact Report (RDEIR) for Home Depot: City of Long Beach, May 2006)**

Dear Ms. Reynolds:

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report. The SCAQMD previously submitted comments on the DEIR 2005, which are attached, herein, and incorporated by reference.

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 is available 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

LAC060602-01
Control Number

**Recirculated Draft Environmental Impact Report (RDEIR) for Home Depot: City of Long Beach (May 2006)**

1. **Soil Contamination Emission Estimates and Health Risk Assessment:** On page 4.6-3 of the RDEIR, it is stated that a March 1, 2004 investigation revealed methane soil gas concentrations as high as 40,000 ppm by volume within the Tank No. 4 area. According to the lead agency, "this level of concentration exceeds the current regulatory threshold of 5,000 ppm." The lead agency however, states that because VOCs or methane were not detected in the two on-site and one off-site air samples, "air quality at the project site is not currently considered an environmental concern for the project site." On page 4.6-13 the lead agency further states "the extent of petroleum hydrocarbon and metals contamination from operation of the Aboveground Storage Tanks (ASTs) and support facilities is unknown." The lead agency also notes the possibility of past leaks or spills from the four pad-mounted transformers creating a potential environmental concern. SCAQMD staff considers the above statements contradictory. SCAQMD staff believes that until detailed studies are done to determine the extent of VOC-contamination in the soils at the project site, it is premature for the lead agency to conclude that the project site does not pose an environmental concern. Further analysis is warranted prior to certification of the DEIR.

2. **Emissions From Soil Remediation Activities**: On page 4.6-6 of the RDEIR, it is stated that the project applicant is in the process of entering into a Corrective Action Consent Agreement with the Department of Toxic Substances Control (DTSC) in connection with any future tests and remedial actions that need to be taken on the site in preparation for project construction. SCAQMD staff believes that this approach taken by the lead agency regarding these future tests and possible remedial actions improperly defer to some undefined future date the health risk potential and is inconsistent with CEQA Guidelines. This precludes the public from reviewing and commenting on the risks and determining whether or not the proposed mitigation measures can reduce those risks.

   SCAQMD staff recommends that the soil studies be done and the extent of soil contamination determined prior to certification of the Final EIR. Should the soil tests prove the presence of VOC contamination at the project site, the proposed project would be subject to two SCAQMD Rules. These two rules are Rule 1150 – Excavation of Landfill Sites, and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. These should be included in the discussion in Section 4.6 of the Final EIR.

   Further, the exact nature of the remediation activity should be included in the Final EIR. The description should include the size of the area disturbed, the types and number of construction equipment required, the number of trucks required to haul contaminated soil, etc. The amount of soil disturbed and contaminates emitted should be presented in the Final EIR. Emissions (VOC)

from the soil remediation activities and those (VOC, $NO_X$ and PM10) from the trucking of the treated or contaminated soil off-site for disposal should also be included in the Final EIR.

**3. <u>Health Risk Assessment</u>**

- Page 6-9 of the RDEIR outlines the procedure used to estimated idling emission factors. The idling emission factors were not determined correctly. EMFAC2002 estimates the idling emission factors from diesel exhaust when zero is entered in as a speed. The Final EIR should incorporate into the HRA the correct idling emission factors from EMFAC2002.
- The lead agency used an idling time of 1.5 minutes per trip. The 1.5 minute per trip is not standard. The California Air Resources Board's (CARB's) idling rule restricts idling to five minutes per event. Truck trips typically include more than one idling event (idle while waiting for a dock, idle at dock before unloading/loading, idle at dock after unloading/loading). While all idling events may not occur each trip and a full five minutes of idling may not occur during each idling event, it is not clear that idling can be restricted to 1.5 minutes of idling per trip. SCAQMD staff recommends using fifteen minutes of idling per trip to represent the standard delivery truck trip.
  If the lead agency continues to use the 1.5 minute idle per trip, then a 1.5 minute idle per trip restriction should be added as a mitigation measure or as a condition in the land use permit. The Final EIR should either include 15 minutes of idling per trip or a mitigation measure or include a 1.5 minute idle restriction mitigation measure that would be included as part of any land use permit condition.
- TSCREEN3 is not typically used for health risk assessment. TSCREEN3 includes SCREEN3 which is the standard EPA screening model. However, TSCREEN3 uses an old version of SCREEN3 (version 95250), the current version of SCREEN is 96043. The most recent version of SCREEN3 should be used for the HRA in the Final EIR. The output of the SCREEN3 version 96043 needs to be included in the Final EIR so that the public can verify the correct model was used and verify the inputs and outputs.
- Documentation in the RDEIR on the HRA is not complete and difficult to follow. The public would not be able to reproduce steps taken to estimate health risk. Table 6.2D in the RDEIR presents the emission rate in grams per day. Table 6.2.E presents a unitized emission rate. SCAQMD staff attempted to reproduce the values in the RDEIR, but was not able to duplicate the results. When the input parameters in Table 6.2E were placed into SCREEN3, the result was 294.1 micrograms per square meter. If the operating time is eight-hours, then the emission rate would be 0.00316 grams per second. If the operating time is 24-hours, then the emission rate would be 0.001053 grams per second. For the eight-hour operating time, the 1-hour concentration would be 0.93 micrograms per square meter. For the 24-hour operating time, the emission rate would be 0.31 micrograms per square meter. The 0.27 micrograms per square meter reported in Table 6.2F is lower than both. The lead agency does not disclose that a 0.08 conversion factor was used to convert 1-hour concentrations estimate with SCREEN3 to annual concentrations. The Final EIR needs to include clear

documentation on how the HRA was completed. Without clear documentation, either in the RDEIR or in associated appendices, it is not certain that the lead agency has fulfilled CEQA Guidelines §§ 15147 and 15151.

- On page 6-11 of the RDEIR, the breathing rate used for the inhalation cancer risk is listed as 271 L/kg-day. Inhalation cancer health risk should be estimated with a breathing rate of 302 L/kg-day as presented in the CARB Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk which can be downloaded from the CARB site at http://www.arb.ca.gov/toxics/harp/docs/rmpolicy.PDF.
- No worker risk was estimated in the HRA. Typically, worker risk is estimated at worksites adjacent to the project site. However, because the project consists of several retail and restaurant establishments that would be operated by independent owners, health risk impacts from idling trucks at the Home Depot to retail and restaurant workers that are part of the proposed project should be disclosed to those workers. It would not be reasonable to expect that protective equipment would be available to the workers at the retail and restaurants by their employers. Therefore, risk to workers at retail and restaurant stores on the proposed project site should be included in the HRA. Worker risk needs to be included in the Final EIR.
- No map was provided that shows the location of the source and the sensitive, residential and worker receptors as required by SCAQMD guidelines which can be downloaded from the SCAQMD website at http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. A map that shows the source and receptors needs to be included in the Final EIR.

**4.** **CO Hotspots**

The traffic volumes presented in the CO hotspots do not appear to match the traffic volumes presented in the Traffic Report. The CO hotpots analysis should describe which traffic volumes were used in the CO hotspots analysis in the Final EIR.

**5.** **Localized Impacts**: Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors, i.e., the residential community west of the proposed project site, University Park Estates. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

**6.** **Project Acreage and $PM_{10}$ Emissions**: On page 3-5 of the RDEIR the net development site for the proposed project is estimated to be 16.7 acres. This includes landscaping of approximately 1.37 acres. On page 5-7 or the RDEIR the lead agency incorrectly describes the entire project site of 1.37 acres being under construction or exposed on any single day. Please revise the text to reflect actual

grading emissions. Appendix C currently shows only the URBEMIS 2002 operational emissions from the proposed project. In the absence of the construction emissions in Appendix C it is not clear how the lead agency calculated the proposed project's construction emissions and what assumptions were used. Please provide construction emission calculations, assumptions, emission factors, etc., in the Final EIR to facilitate review of the proposed project's emissions.