



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Ms. Karen Hoo, City Planner
Los Angeles World Airports
Environmental Planning
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Draft Environmental Impact Report (Draft EIR) for the Proposed Pacific Gateway Cargo Center at Ontario International Airport

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 into the Final Environmental Impact Report.

The SCAQMD staff recommends that the lead agency provide assurance that the existing buffer between the residences and sensitive receptors, and the proposed project be maintained to ensure the point of maximum impact (56 in a million) does not impact future residents and sensitive receptors. The DEIR indicates that there are no residences present north of the project site, at the point of maximum impact. Since, however, the area north of the proposed project site is vacant the SCAQMD staff recommends that the FEIR explain how the lead agency will prevent residential and sensitive receptors from locating in this area in the future. In addition, the SCAQMD staff recommends that the Final EIR adequately describe the specific sensitive receptors located within a quarter of a mile from the proposed project site.

The SCAQMD staff is concerned that the DEIR may have underestimated operational emissions from trucks traveling to and from, and idling at the Proposed Pacific Gateway Cargo Center. It appears that the DEIR assumed a distance of 20 miles per truck trip. The SCAQMD staff generally recommends a distance of 40 miles per one-way truck trip (80 miles round-trip). In addition, it is important that the idling assumptions include all idling events that are expected to occur within the proposed project site. Thus, although CARB regulations would limit idling to 5 minutes per event, it is expected that there would be multiple idling events within the proposed project site. These assumptions are important to accurately quantify the operational emissions. In addition, the assumptions for idling at the Proposed Cargo Center is a key element in estimating the potential health risks.

Ms. Karen Hoo
City Planner

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Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura
Planning Manager

Attachment

SN:GM

SBC060427-09
Control Number

Construction Impacts

Demolition

1. In Volume II, Appendix E Table 5-4a Estimated Construction Emissions, the estimate for total PM10 during demolition is 320.27 pounds per day, which is above significance threshold. However, the lead agency concludes on page 4-66 that estimated daily construction emissions during demolition are less than significant compared with the SCAQMD daily significance threshold for PM10, which is 150 pounds per day. The SCAQMD staff recommends that the lead agency address this discrepancy in the Final EIR. Should any cumulative construction activities exceed any daily significance thresholds, the lead agency should adopt feasible mitigation measures to reduce construction air quality impacts from the project and include those adopted measures in the Final EIR.

Architectural Coating

2. In Volume II of the Technical Appendices in Appendix E on pages 15 and 16, the lead agency states, in part that “VOC emissions from the application of architectural coating and solvents were calculated from equations in the SCAQMD CEQA Air Quality Handbook” (Handbook) and cites SCAQMD Rule 1113. Although discussed in the narration, the Draft EIR does not show emission estimates for architectural coating activities during building construction phases in Volume II of the Technical Appendices in Appendix E in Table 5-4a. The Final EIR should include estimates for architectural coating operations along with supporting documentation including emissions factors, equations, methodologies, etc. Should any cumulative construction activities exceed any daily significance thresholds, the lead agency should adopt feasible mitigation measures to reduce construction air quality impacts from the project and include those adopted measures in the Final EIR.

Localized Significance Threshold

3. Because the proposed site is located less than a quarter-mile from existing single- and multi-family residential buildings (Draft EIR, Figure 4.2-3), the SCAQMD staff recommends that the lead agency conduct a localized air quality analysis to ensure that the residents in those existing land uses are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

Construction Mitigation Measures

4. Since the lead agency has determined in the Draft EIR on page 4-67 of the Draft EIR that oxides of nitrogen (NOx) emissions from construction activities exceed the SCAQMD daily significance threshold of 100 pounds per day, the SCAQMD recommends that the lead agency consider the following modifications and additional mitigation measures to reduce NOx construction air quality impacts from the project, if applicable and feasible:

Recommended Changes:

1. Trucks idling on site will be limited to five minutes on and off-site.
3. Use of construction equipment will be suspended during ~~second~~ first stage smog alerts that encompass ONT.

Recommended Additions:

- Configure construction parking to minimize traffic interference.
 - Reroute construction trucks away from congested streets or sensitive receptor areas.
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
 - Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
 - Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.
5. In the event that the lead agency's revised air quality analysis (see comments #1 and #2) shows that criteria pollutant emissions exceed the SCAQMD's daily significance thresholds for particulate matter (PM10) from fugitive dust and volatile organic compounds (VOC), the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce PM10 from fugitive dust and VOC impacts from the propose project, if applicable and feasible:

PM10

Recommended Additions:

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend SCAQMD Rule 1186 certified water sweepers with reclaimed water).
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.

- Water active sites at least twice daily;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

VOC

Recommended Additions:

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Use pre-painted construction materials.

Operational Impacts

Exceedance of Air Quality Standard

6. On page 27 of the Draft EIR, future ambient background calculations are said to be estimated by rolling back current ambient background concentrations. SCAQMD staff does not recognize the roll back of ambient background concentrations to estimate future background concentrations. The standard approach to estimate future CO emissions is to use the tables provided on the SCAQMD website at <http://www.aqmd.gov/ceqa/handbook/CO/CO.html>.

NOx background emissions are estimated by taking the highest NOx concentration at the nearest representative monitoring station. Ontario is source receptor area (SRA) 33. Since SRA 33 does not have an air quality monitoring station, the Upland air quality monitoring station is typically used. The highest 1-hour NO2 concentration in the last five years is 0.11 ppm (<http://www.aqmd.gov/smog/historicaldata.htm>). The proposed project NO2 concentration in Table 5-7 of the Draft EIR is listed as 0.156 ppm. The total concentration from the both the proposed and background concentration would be 0.276 ppm which is greater than the CAAQS for NO2 of 0.25 ppm. Based on this it appears that the proposed project is significant for NO2 concentrations. The Final EIR should include an analysis of operational impacts based upon background concentrations as discussed above.

The operational concentration analysis was only completed for NO2 and CO. The SCAQMD staff recommends that a similar analysis be conducted for PM10 to quantify the localized PM10 emissions from operational phase of the proposed project. In addition, as previously stated the SCAQMD staff recommends that the lead agency include a localized impact analysis for the construction phase of the project.

Vehicle Miles Traveled

7. The SCAQMD staff is concerned that operational emissions may have been underestimated from truck trips. The SCAQMD staff recommends that the lead agency assume a minimum distance of 40-miles per vehicle trip (80-miles round trip) unless the lead agency can substantiate a shorter distance. A trip distance may be appropriate since vehicles and trucks could be traveling from the proposed PGCC site to destinations in or out of the SCAG region.
8. From the projected project-related truck traffic generation in the Technical Appendices, Appendix E on pages 26 and 27 of Volume II of the Draft EIR, the proposed project could generate significant diesel exhaust particulate emissions from gasoline and delivery trucks traveling and idling in support of the proposed airport cargo center. Idling may also occur at the entrance of the cargo center and during the loading and delivery operations. Because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic and if there is a substantial amount of heavy-duty diesel truck trips at this site, which will emit particulate emissions from trucks queuing and idling, the air toxic health risk analysis performed by the lead agency may warrant mitigation measures that can be used to mitigate diesel exhaust emissions. This is particularly relevant since the proposed project is within ¼-mile of existing single- and multi-family residences located within a quarter of a mile of the proposed site.

Potential Mitigation Measures for Long Term Operations

- Provide a minimum buffer zone of 300 meters between truck traffic and sensitive receptors
- Re-route truck traffic by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Enforce any local truck parking restrictions;
- Develop park and ride programs;
- Restrict truck idling to five minutes or less;
- Restrict operation to “clean” trucks;
- Electrify service equipment at facility;
- Provide electrical hook-ups for trucks that need to cool their load;
- Electrify auxiliary power units;
- Pave roads and road shoulders.
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, services such as automated teller machines; etc.
- Require or provide incentives for haul/delivery trucks to use low-sulfur diesel fuel with particulate traps.

- Conduct air quality monitoring at sensitive receptors if impacts are found to be significant.
- Utilize alternative fueled off-road equipment.

Operational Criteria Pollutant Modeling

8. The air quality impact analysis (AQIA) does not contain isopleths maps. The Final EIR should contain concentration isopleth maps for each modeling run (course and fine receptor grids) so that the public can verify that the sources and receptors were placed properly. Without the concentration isopleth maps, it is not clear that the refined receptor grids were placed correctly. The receptor with the highest concentration should be labeled.

Health Risk Assessment

9. The SCAQMD staff is concerned that the health risks may have been under estimated due to trucks idling on-site. Page 26 of the Air Quality Impact Analysis and page 3-6 of the Air Toxics Risk Assessment states that heavy-duty diesel trucks were assumed to idle on-site for only five minutes based on CARB's idling rule. CARB's idling rule prevents idling for more than five minutes at a single time. Since most intermodal operations require that trucks check-in, load or unload, the SCAQMD staff recommends that the analysis assume 15 minutes of diesel truck idling to account for the various areas where idling is expected.
10. The HARP output files (PGCCen.out, PGccMax.out, PGCCSen.out) show that the rural air dispersion coefficient option was used to estimate concentrations. SCAQMD requires that the urban air dispersion coefficient option be used to estimate concentrations in the district. The Final EIR should include health risk based on concentrations estimated with the air dispersion coefficient option.
11. Page A-8 of the HRA states that the PGCCMax.out file should include gridded receptors. The PGCCMax.out file sent separately via e-mail to SCAQMD does not include a receptor grid. Therefore, it appears that health risk was only estimate at sensitive receptors listed on Figure 4-3. Since a course receptor grid does not was not identified in the Draft EIR/modeling files, verification of the correct placement of the refined receptor grid could not be determined. The Final EIR should include a complete list of all modeling files including the 100- and 500-meter receptor grid files.
12. The HRA does not contain isopleths maps. The Final EIR should contain health risk isopleth maps for each set of modeling runs (course, refined receptor grids) so that the public can verify that the sources and receptors were placed properly, and that the health risk is described accurately in the text of the HRA and Draft EIR. Without the health risk isopleth maps, it is not clear that the refined receptor grids were placed correctly. The maps should also include the maximum individual cancer risk (MICR), maximally exposed individual resident (MEIR), maximally exposed

individual worker cancer risk (MEIW) and the location where the highest non-cancer chronic and acute indices would occur.