



South Coast  
Air Quality Management District

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

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July 24, 2007

Mr. John Atwater, Senior Planner  
City of Upland  
Community Development Department  
460 North Euclid Avenue  
Upland, CA 91786

**Draft Negative Declaration for the Proposed Holiday Rock Company CUP, Mine  
and Reclamation Plan for Holliday Rock's Pits 4 and 5**

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 Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD 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,

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

Attachment

SS:GM

SBC070720-01  
Control Number

### **Lead Agency Does Not Estimate Construction/Operational Emissions**

1. In the Draft Negative Declaration's (Draft ND) project description, the lead agency proposes to increase the depth of Pits 4 and 5 from the current depth of 65 to 100 feet, respectively to a total depth of 250 feet in a combined area of approximately 114 acres. The lead agency also proposes to add conveying equipment to move the mined material to an existing quarry process plant south of Base Line Road instead of the existing method that uses off-road haul trucks to transport material to a plant near Pit 4. The lead agency concludes that the use of a conveyor(s) would produce less dust and exhaust emissions than using haul trucks. The lead agency, however, does not quantify the project's current operational air quality impacts or the proposed operational air quality impacts, so SCAQMD staff cannot verify the conclusion that emissions from the proposed project are less than significant and that the current operations of the proposed project will not generate significant adverse construction or operational air quality impacts.

To calculate the proposed project's emission impacts, the lead agency can utilize the the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook or U.S. EPA's AP-42 Inventories and Emission Factors.

### **Localized Significance Thresholds**

2. Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that, when quantifying air quality impacts (see comment 1), the lead agency evaluate localized air quality impacts. Because the proposed site is located near existing residential uses (page 4 of the Initial Study), a localized air quality analysis may be warranted to ensure that any nearby residents are not adversely affected by the fugitive dust generating 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> .

### **PM2.5 Significance Thresholds**

3. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When

quantifying the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html) . Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

### **Permitted Equipment**

4. In the project description, the lead agency describes the potential addition of conveying equipment to move materials mined from Pits 4 and 5 to an existing quarry plants south of Baseline Road. The lead agency is reminded that the proposed conveying or control equipment associated with the conveying operation may also warrant permit review by the South Coast AQMD. Prior to construction or operation of any additional conveying or associated mining operation equipment including crushing, screening, truck loading equipment, etc., please contact SCAQMD staff at (909) 396-2591.
5. The Draft ND states that the proposed project includes adding conveying equipment to move material instead of using haul trucks to transport material to the Foothill Plant. The lead agency should add, as a condition of approval, a condition prohibiting the transport of mined material by haul truck. In the absence of such a condition, emissions from the haul trucks should be quantified.
6. In addition to the specific requirements of Rule 1157 listed on page 12 of the Draft ND, the proposed project is also subject to watering requirements such that fugitive dust does not exceed the opacity limits in Rule 1157(d)(1)(A)(i) and (d)(1)(A)(ii).