



South Coast
Air Quality Management District

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Ms. Emmy Andrews
Pacific Facilities Service Office
395 Oyster Point Blvd., Suite 225
South San Francisco, CA 94080-0300

Draft Environmental Impact Statement (Draft EIS) for the Proposed Construction and Operation of an Incoming Mail Facility in Aliso Viejo, California

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. On October 23, 2007, the SCAQMD staff submitted comments on the Draft EIS dated August 2007 (SCH No. 2008024001) and incorporates into the record by reference those comments as applicable for the currently proposed project. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Statement (Final EIS).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Assessment. 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,

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

Attachment

SS:GM

ORC080722-03
Control Number

Project Description

1. In the project description (see also comment #8) for the proposed action on page 2-10, the lead agency states that total staff at the facility would be 561 full-time staff but on pages 2-14 and 2-15, the total from operation employees and maintenance employees is 418 (see also Section 4.3 Air Quality on page 4-7). Review of the URBEMIS2007 output sheets appears to indicate that 418 is the correct number of employees as there are 836 one-way worker commute trips ($836/2 = 418$). If the project actually will include 561 employees, the URBEMIS2007 analysis needs to be revised and included in the Final EIS.

Air Quality Analysis

2. On page 4-16 paragraph 2, the lead agency states that the closest occupied structures are about 200 feet from the site boundary. On page 4-17, the closest distances are stated as 150 feet from the site. The lead agency should reconcile this apparent discrepancy in the Final EIS. The distance to the sensitive receptors is important because it will affect the conclusion of the health risk assessment (see comment #10)

Construction Emission Estimates

3. Table 4-4 on page 4-13 of the Draft EIS and supportive document (e.g., URBEMIS2007 output sheets and the CNSTEMIS spreadsheets) shows that construction NO_x emissions exceed the SCAQMD's recommended daily NO_x construction significance threshold. Based on the fact that the data show significant daily NO_x emissions during construction, the SCAQMD requests that the lead agency identify mitigation measures to reduce daily construction emissions to less than 100 pounds per day of NO_x emissions. Suggested mitigation for off-road equipment can be found at the following URL: www.aqmd.gov/ceqa/handbook/mitigation/offroad/MM_offroad.html . Suggested mitigation measures for on-road heavy-duty trucks can be found at the following URL: www.aqmd.gov/ceqa/handbook/mitigation/onroad/MM_onroad.html .
4. The analysis prepared by the lead agency shows in Table 4-4 on page 4-13 that construction air quality impacts exceed the SCAQMD regional daily significance threshold during construction for NO_x, but the lead agency has determined that construction NO_x emissions are not significant stating, in part "When considered in the context of the CAA conformity threshold and the suggested localized significance threshold, the estimated maximum daily NO_x emissions are not considered a significant air quality impact, even though the emissions would exceed the SCAQMD regional daily emissions threshold during one phase of construction activity." The SCAQMD strongly disagrees with this argument because nonattainment is based on daily exceedances of the state and federal ambient air quality standards. Further, the phase in which project construction activities will exceed the SCAQMD daily significance threshold for NO_x occurs in the excavation and grading phase, which last up to 75 days. Those factors contribute to the regional emissions inventory and

therefore contribute to the basin's poor air quality. Therefore, even short-term emissions must be considered significant if a regional significance threshold is exceeded and that exceedance must be mitigated whether a significance threshold level is exceeded from localized or regional air quality impacts.

Architectural Coating and Asphalt Off-Gas Emission Estimates

5. In Appendix D of the Draft EIS, the lead agency during in construction year 2010 estimates fugitive reactive organic gases (ROG) for finishing and paving but does not include the equations, emission factors, methodologies used in calculating those estimates. In the Final EIS, please include the methodologies, emission factors, equations, etc. used to estimate project architectural coating and asphalt paving emission impacts.

Health Risk Assessment

Operational

6. The SCAQMD requests that for transportation projects should follow the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, which can be found at http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc. The carcinogenic health risk, however, should be estimated using the cancer potency factor instead of the unit risk factor (see Risk Assessment Procedures for Rules 1401 and 212, Version 7.0 at <http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>). The Final EIS should include a revised HRA prepared pursuant to the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.
7. The health risk assessment was estimated using CALINE4. CALINE4 was developed to estimate CO and PM concentrations based on a one-hour averaging time. An attempt to scale the one-hour average concentrations to 70-year average concentration was made. However, since there is no known agency guidance for such practice and the methodology does not appear to be peer reviewed by EPA, CALTRANS, ARB or OEHHA, there is no means to adequately validate the methodology within the public comment period of the Draft EIR. Therefore, it is inappropriate to use CALINE4 for estimating health risks

A federal or state approved model for estimating carcinogenic health risk should be used to estimate health risk from the proposed project in the Final EIS.

8. CALINE4 estimates emissions based on a composite emission factor, which is developed based on average link speed, operating conditions of the engine, and vehicle mix for each free flow link. Typically, the greatest adverse carcinogenic health risk impacts to near field receptors is from diesel truck exhaust particulate

emissions from trucks idling at proposed project sites. Adverse carcinogenic health risk impacts from diesel truck exhaust particulate idling emissions cannot be quantified or presented using CALINE4. Therefore, since idling emissions have not been specifically addressed, it is unclear if the HRA has estimated and reported the maximum carcinogenic health risk from the proposed project.

SCAQMD staff requests that the Final EIS include an HRA that has been re-done using ISCST3 according to SCAQMD methodology, which includes idling on-site. SCAQMD staff suggests a default of 15 minutes of idling on-site. State law limits idling to five minutes at any one time; however, trucks often idle at several points on-site (e.g., at the guard's station, waiting for a loading dock, at the loading dock before unloading/loading, at the loading dock after unloading/loading, before parking, after parking, etc.). Based on an evaluation of the activities on-site, the lead agency may need to lengthen the idling time.

Idling emissions should be estimated using EMFAC2007. Idling emissions are estimated in EMFAC2007 by including a vehicle speed of zero.

9. Discrete receptors were used to estimate concentrations from proposed operational emissions. SCAQMD requires that gridded receptors be used to demonstrate maximum concentrations have been estimated at residential, sensitive and occupational receptors. Discrete receptors should be used to represent sensitive receptors. The methodology for placing receptors detailed in the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis should be followed in the revised HRA included in the Final EIS.
An exposure duration of 70 years should be used for residential and sensitive receptors. An exposure duration of 40 years should be used for occupational receptors.
10. Maps showing the maximum residential, sensitive and occupational receptors for carcinogenic and non-carcinogenic health risk should be included in the revised HRA in the Final EIS. The maps should also show isopleths that represent the 10 in one million (10×10^{-6}) carcinogenic health risk.
11. All electronic media associated with the revised HRA should be included with the Final EIS when provided to the SCAQMD. Electronic media should be in the format required by the associated models (i.e, input files and output files for the air dispersion model). Associated spreadsheets and databases used to estimate health risk from the concentrations estimated by the air dispersion model should also be provided.

Construction

12. CALINE4 was developed to estimate CO and PM concentrations from on-road vehicle travel. CALINE4 was used to estimate health risk from construction

emissions. Since construction emissions include emissions from offroad construction vehicles, CALINE4 is not the appropriate model to estimate concentrations for health risk.

CALINE4 was developed to estimate CO and PM emissions based on a one-hour averaging time. An attempt to scale the one-hour average concentrations to 70-year average concentration was made. However, since there is no known agency guidance for such practice and the methodology does not appear to be peer reviewed by EPA, CALTRANS, ARB or OEHHA, there is no means to adequately validate the methodology within the public comment period of the Draft EIS. Therefore, it is inappropriate to use CALINE4 for estimating health risks.

A federal or state approved model for estimating carcinogenic health risk should be used to estimate health risk from the proposed project in the Final EIS. Since both off-road and on-road sources are modeled, SCAQMD staff suggests that ISCST3 or AERMOD be used for air dispersion modeling. Both ISCST3 and AERMOD modeling is accepted by SCAQMD; however, EPA may only accept the use of AERMOD. The lead agency should contact EPA before revising the air dispersion modeling.

13. Discrete receptors were used to estimate concentrations from proposed operational emissions. SCAQMD requires that gridded receptors be used to demonstrate maximum concentrations have been estimated at residential, sensitive and occupational receptors. Discrete receptors should be used to represent sensitive receptors.

An exposure duration of 70 years should be used for residential and sensitive receptors. An exposure duration of 40 years should be used for occupational receptors.

14. Maps showing the maximum residential, sensitive and occupational receptors for carcinogenic and non-carcinogenic health risk should be included in the revised HRA in the Final EIS.