South Coast
Air Quality Management District
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**Final Mitigated Negative Declaration (MND) for the Proposed Tentative Tract Map. No. 72152**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. In our June 21 comment letter on the Draft MND, we had requested that a Health Risk Assessment (HRA) be conducted to address potential air quality concerns to future residents of the project site from surrounding industrial land uses. We appreciate that the lead agency considered our comments and prepared a screening level HRA for the project site, however we are concerned that the HRA has not adequately evaluated potential risks to future site residents. The following comments are provided in response to this HRA that SCAQMD staff received Friday, July 12.

The technical methodology used in the screening HRA resulted in the omission of several sources of emissions, and potential underestimation of health risk impacts to future residents. As the reported health risk of 8.8 per million is close to the SCAQMD significance threshold of 10 per million, correcting these methodological issues may reveal a potential risk above our threshold. We recommend that the lead agency provide a more comprehensive analysis prior to considering this project for approval. In addition to the comments attached below, this re-analysis should consider site-specific factors such as actual business activity based on interviews of nearby industries.

The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

LAC130712-01
Control Number

**Health Risk Assessment Methodology**

SCAQMD staff provided an expedited review of the HRA provided by the lead agency and found that the following items may result in potentially underestimated risks. SCAQMD staff did not receive the electronic emission calculation sheets that accompany the HRA, and may have additional comments on the calculations if those are received.

*Diesel Particulate Matter Fraction*

On page 12, the HRA states that Diesel Particulate Matter (DPM) is calculated as 96% of $PM_{2.5}$. This non-standard approach is not consistent with existing guidance. For example, the identification of DPM as a Toxic Air Contaminant by Cal-EPA[1] found that PM2.5 makes up only about 94% of particulates of diesel engines. An authoritative reference should be provided if anything less than PM10 is used to determine DPM emissions.

*Area Source Treatment in SCREEN3*

The four industrial facilities were modeled in SCREEN3 using area sources that equaled the entire area of each particular industrial property. However the areas that actually contain emissions are limited to areas where trucks travel, a much smaller area. By spreading emissions across the entire facility, the source strength is inappropriately diluted and risks may be underestimated. SCAQMD staff recommends that the lead agency use area poly sources in AERMOD to model truck emissions.

*Ready-Pac Emissions Sources*

Several sources of emissions were not included from this facility including 4 onsite diesel emergency generators and another two natural gas engines. Further, diesel engine powered Transportation Refrigeration Units (TRUs) may be utilized on many trailers servicing this facility. Lastly, emissions from any onsite hostlers used to move trailers around the site should be considered.

*San Gabriel Valley Tribune*

The HRA should clarify if any printing operations occur at this facility. Printing operations may be a source of toxic emissions.

*Decore-ative Specialties*

This facility operates a diesel powered emergency generator that was not included in the HRA. In addition, it appears that this facility makes custom woodworking products (e.g., for cabinets, etc.). The HRA should clarify if any finishing operations occur here that might be a source of VOC (and potentially toxic) emissions, such as application of lacquers, stains, etc. If any of this activity occurs at this facility, those emissions should be included in the HRA.

*Pepsi Bottling*

The HRA should include emissions from any toxic emissions related to onsite vehicle fueling activities

[1] http://www.arb.ca.gov/toxics/dieseltac/finexsum.pdf

*Metrolink Rail Line*

The emission rate of 1.087E-4 grams/second calculated for train emissions from the Metrolink rail line appears to be miscalculated by about a factor of 10 from the 2.3023 grams/train (with 42 daily trains) calculated earlier in the HRA. An emission rate of 1.087E-3 grams/second was input into the SCREEN3 model, however the resulting concentration from this SCREEN3 run was divided by 10 before analyzing the health risk from this source. As the HRA determines that the Metrolink line contributes a risk of one per million, this 10-fold difference may constitute a significant difference. Further, the speed used to calculated the 2.3023 grams/train assumes that trains travel 125 mph adjacent to the site. This velocity appears to be too fast and should be re-considered in the HRA.

*Additional Sources Within ¼ Mile*

As stated in our previous letter, the HRA should evaluate all potential permitted and unpermitted sources of emissions within ¼ mile of the project site. Upon cursory inspection of Google Earth, SCAQMD staff identified a gas station and a fast food restaurant that may emit toxics. While these smaller sources on their own typically do not constitute a significant health risk, these sources taken in addition to the larger industrial sources located adjacent to the site may constitute an additional burden on project site residents. Other potential sources should be considered including a rail spur just west-northwest of the site, other potential freight traffic on the Metrolink rail line adjacent to the site, and any other potential sources nearby.