



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Olive Pit Mine and Reclamation Project (SCH NO. 2014031051)

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 CEQA document.

The proposed project includes 1) relocation of the on-site access point from Olive Street to the southeastern portion of Los Angeles Street where a new on-site access road will be constructed; 2) phased extraction of mineral resources in two phases (Phase 1 and 2); and 3) site reclamation in two phases (Phase 1 and 2). One phase of reclamation and one phase of extraction will overlap (Phase 1 Reclamation and Phase 2 Extraction). The proposed project will yield approximately 32-million tons of recoverable aggregate reserves at an average production level of 1-million tons per year beginning in 2015. This rate of production will occur for approximately 32 years (until 2052) with filling operations for reclamation happening at the same time beginning in 2020. The proposed project will also include 262 daily truck trips hauling extracted aggregate off-site to the processing plant located 3.8 miles from the project site.

The Lead Agency analyzed regional, localized and health effects and has compared the estimates with SCAQMD thresholds of significance. Based on these analyses, the Lead Agency has determined that project regional operation NOx emissions are significant. These emissions are mainly generated by on-site extraction and reclamation equipment as well as off-site trucks hauling aggregate from the site and returning with backfill for reclamation. However, based on the SCAQMD staff's review of the localized emission impacts analysis, there is insufficient information to support the Lead Agency's determination that these impacts are less than significant.

Since the proposed project is located as close as 100 feet from sensitive receptors including single- and multi-family residences to the west and north of the project site; Ernest Geddes Elementary School (240 feet west of the project site); North Park High School (500 feet west of the project site); Pleasant View Elementary (690 feet to the

north); Jerry Holland Junior High School (2,660 feet to the west); and Santa Fe Elementary (2,760 feet to the west), the SCAQMD staff has concerns about the potential regional NOx and fugitive dust impacts, as well as localized impacts from project operations.

The SCAQMD staff also has concerns about assumptions made in the air quality analysis emissions modeling for localized impacts and health risk effects. In addition, there are comments concerning compliance with SCAQMD rules that were not included in the Draft EIR. Further, the proposed mine area is located near several old disposal sites. The Final EIR should therefore include discussion and project actions to be taken if soil disturbance activities cause the release of potential air contaminants, dust or odors. Finally, the SCAQMD staff is concerned that all feasible mitigation measures be incorporated in the project and Final EIR. Additional details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. 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,



Edward A. Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:MN:EP:RM:JB:HH:GM

LAC140815-05
Control Number

Air Quality Analysis

Emissions Modeling for Localized Impacts and Health Risk Effects

1. For the dispersion modeling sections (both LST and HRA), it is not clear how the emissions for each source (roadway or on-site) were calculated and applied to the AERMOD results to get the project's impact. Although the electronic files contain spreadsheets showing the project's impacts, it is difficult to understand what factors were used. Please update Appendix C with more detailed information, such as sample calculations showing how the project's impacts were estimated, and sample calculations showing how the emissions from CalEEMod and/or EMFAC were used to determine the emission rates of the sources modeled. Without these details, it is not possible to review the Air Quality impacts stated in the Draft EIR for accuracy.
2. The dispersion modeling performed for this project included volume sources along the roadways used by the trucks generated from this project, as well as area sources within the project area to simulate the various stages of the mining operation. There are additional volume sources placed within the project site to simulate truck movement on unpaved roads, however, this segment is only in the middle of the project site and does not connect to the proposed paved access road being constructed. Please provide a detailed explanation as to how the on-site truck travel emissions were calculated and modeled and revise the analysis, if needed.
3. Some of the receptors were placed within the volume source exclusion zone and their results would be invalid. It is recommended that the LST analysis be updated so that no receptors are placed within the volume source exclusion zone either by modeling the roadway as an area source or the volume sources be reduced in size.
4. The emissions from within the pit were modeled in AERMOD using an area source. However, AERMOD has an open pit source type which would be more appropriate for this project. Please revise the analysis using the open pit or provide a discussion as to why the area source treatment would be more appropriate for this project.
5. Under Threshold AQ-3 of the Draft EIR, an LST analysis was performed for the project's operational emissions. However, there was no LST analysis for the project's construction emissions. The Final EIR should include a LST analysis for project construction.
6. In the modeling for the HRA, receptors were only placed in residential areas. According to SCAQMD HRA modeling procedures, the receptor grid should start at the project boundary. The cancer risks at each receptor can then be calculated for either a worker or residential receptor, based on the receptor type.
7. In the HRA, the project's emissions of diesel particulate matter (DPM) were evaluated to determine the health risk impacts to receptors in the project vicinity. However, it is unclear how the emissions were calculated and if any idling emissions

were included in the estimate, as necessary. Please update the HRA in the Final EIR to include detailed information on the calculation of DPM emissions and how they were assigned to each source modeled within AERMOD.

SCAQMD Permit Requirements

8. Based on the project description, the following comments apply for SCAQMD permit purposes. Specific permit questions can be directed to SCAQMD Engineering and Compliance staff at (909) 396-2591.
 - a) All hoppers and conveyors will require SCAQMD permits. Water sprays at the receiving hoppers and at all conveyor transfer points will also be required. Finally, a truck load out enclosure may be necessary in order to contain excess particulates.
 - b) Portable diesel engine generators should not be allowed since land-based power is readily available. Dredging may occur if the water table is encountered during excavation. Drag lines or cutter head dredging should also be powered by land based utility. In order to reduce NOx impacts, dredging driven by diesel engines should not be allowed.
 - c) Based on the project description, the project site is over 50 acres in size and is therefore considered a large operation under SCAQMD Rule 403 – Fugitive Dust. Although the Lead Agency cites general compliance with Rule 403 on page 3.3-13, the Lead Agency is reminded of Rule 403 provisions that specifically apply to the proposed project: 1) the project applicant is required to submit a Rule 403 Large Operation Notification (Form 403N) to the Executive Officer; 2) a sign is to be posted near the entrance of the facility with a responsible individual's name and phone number in case there are any fugitive dust control issues at the site; 3) An onsite supervisor with a current fugitive dust control class certification is also required who is available within 30 minutes to respond any fugitive dust control issue at the site during normal business hours; and 4) this operation will also need to keep onsite records of specific dust control actions taken.
 - d) In the Final EIR, the Lead Agency should cite how the proposed project will comply with the following SCAQMD rules:
 - Rule 401- Visible Emissions;
 - Rule 1157 - PM10 Emission Reductions from Aggregate and Related Operations

Potential Release of Contaminated Emissions from Older Nearby Disposal Sites

8. Based on historical records, there are four existing disposal sites located near the proposed project site: Azusa Canyon Road Dump; Consolidated Rock Products Dump; and the Irwindale Disposal Site; with the Azusa Canyon Road Dump being

located just east of and across the street from the east side of the proposed project site at Azusa Canyon Road and Cypress Street.

Since the contents of these old landfills from project soil disturbance operations could potentially release air emissions including odors impacting nearby communities, the Lead Agency should be aware of the potential impacts from the proposed project and provide discussion of those potential impacts in the Final EIR. Should project activities disturb soil contaminated with volatile organic compounds (VOCs) or release odors, the Final EIR should discuss compliance with requirements including SCAQMD Rule 1166 – Volatile Organic Compound Emissions From Decontaminated Soil and Rule 402 – Nuisance.

Operation Mitigation Measures

9. The Lead Agency has determined that the proposed project will generate significant operational air quality impacts for NO_x, mostly from on-site equipment excavating material from the bottom of the pit, on-road trucks hauling the mined aggregate from the site to a local processing facility and then hauling backfill material to construct a 32-acre pad for future commercial development.

As the Lead Agency is aware, heavy-duty trucks are the largest source of NO_x emissions in our basin and NO_x emissions must be reduced by approximately two thirds beyond existing rules and regulations in order to meet air quality standards as required by 2023. Without meeting air quality standards, our region faces federally mandated sanctions, including possible loss of transportation funding. The SCAQMD staff recommends the following changes and additional measures in addition to the measures listed starting on page 3.3-26 of the Draft EIR to further reduce significant air quality impacts:

Recommended additional measures:

- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets the quantities and emission standards listed in the Draft EIR. This log should be available for inspection by city staff at any time.
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.

- Have truck routes clearly marked with trailblazer signs so trucks will stay on truck routes established by the Lead Agency and not inadvertently enter residential areas or pass by nearby schools.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1 (recommend sweepers using reclaimed water).
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific concern;
- Improve traffic flow by signal synchronization.

Alternative Fueled and Other Clean Truck Phase-In Schedule

10. Because the proposed project is estimated to generate significant regional emissions, the Lead Agency should require further mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the FEIR, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts.

At a minimum, require upon occupancy that all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Electric Vehicle (EV) Charging and CNG Fueling Availability

11. Because trucks will be available that will run on electricity and natural gas during the life of the project, the lead agency should provide information on the location and availability of electric vehicle charging and CNG fueling stations.