South Coast
Air Quality Management District
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Draft Mitigated Declaration (Draft MND) for the Proposed (PA06-0179) Concrete Batch Plant and (PA06-0180) Self-Storage Facility

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 Mitigated Negative Declaration (Final MND).

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD 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 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
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC080716-05
Control Number

Air Quality Analysis

1. SCAQMD staff recommends that text of the Draft MND include summaries of the unmitigated and mitigated emissions for both construction and operation from the July 7, 2008 Air Quality Impact Analysis (AQ Analysis) and compare those estimates with the daily SCAQMD thresholds to demonstrate its finding that short-and long-term emissions are less than significant. The summary information can be in a table, in an appendix or as part of the narration.

LST

3. SCREEN3 was used to estimate criteria pollutant concentrations. The consultant chose a stability class (Class 4) and a wind speed (2 m/s) that reduced the concentration estimated. SCAQMD requires that full meteorology (all stability classes and wind speeds) are used when modeling with SCREEN3. When SCAQMD staff ran SCREEN3 with full meteorology the results were approximately an order of magnitude greater than the results estimated by the consultant. Therefore, it appears as though the PM10 concentrations with full meteorology would exceed the PM10 significance threshold of 2.5 micrograms per cubic meter.

   If more precise results are desired, then ISCST3 should be used with meteorology data collected from the nearest meteorological station (Riverside), which can be downloaded at http://www.aqmd.gov/smog/metdata/MetDataTable1.html.

   The Final CEQA document should include air dispersion modeling completed with SCREEN3 with the full meteorology option chosen or ISCST with meteorology data collected from the nearest meteorological station.

Concrete Batch Plant Operations

4. On page 18 of the Draft MND, the lead states that existing SCAQMD permits to operate are expected to be transferred to the proposed new site. For clarification, SCAQMD permits are not transferred from one site to another. The project proponent will be required to submit new applications for review to construct and operate any equipment subject to SCAQMD rules and regulations, in particular Regulation XIII – New Source Review and Rule 1156 – PM10 Emission Reductions from Cement Manufacturing Facilities. Permitting questions can be directed to SCAQMD staff at (909) 396-2591.

5. On pages 18-21 of the Draft IS/MND, the lead agency estimated daily emissions from concrete batch plant operations using outdated U.S. EPA emission factors. In the Final MND, the lead agency should use the most current AP-42 emission factors including the following and revise the operational emission estimates in the Final MND:

AP-42 Table 11.12-2 (Emission Factors for Concrete Batching on page 11.12-6)

- Controlled Total PM10 for Cement unloading to elevated storage silo (pneumatic) 0.00034;
- Weigh hopper loading based on aggregate/sand: Uncontrolled Total PM10 0.0024 x CE); and
- Mixer loading (central mix): Controlled Total PM10 0.0048.

AP-42 Table 11.19-2.2 (Emission Factors for Crushed Stone Processing Operations on page 11.19.2-8)

- Conveyor Transfer Point (controlled) Total PM10 4.6×10^{-5i} .

Further questions about applicable AP-42 emission factors pertaining to operational emission calculations for concrete batching and SCAQMD permit requirements can be directed to SCAQMD staff at (909) 396-2591 (see also comment #4).

Health Risk Assessment

6. In the Final MND, the lead agency include any diesel fired loader in the risk assessment that is part of the proposed project operations. In addition, the loader's diesel engine may require a catalytic oxidizer to control toxic air contaminants and their associated risks. In the Final IS/MND, the lead agency should include this diesel powered loader in the risk assessment and revise the HRA in the Final IS/MND.

7. The air quality analysis discusses the ARB land use guidance in relation to the impacts from the project upon residential sources. The ARB land use guidance is designed to examine the impacts of existing sources upon a new project that has residential receptors. The distances listed in the ARB land use guidance do not represent distances where the health risk drops below 10 in a million, but distances at which the concentrations from the existing source drops to background concentrations which in the Basin is 479 in a million based on the MATES III analysis (http://www2.aqmd.gov/webappl/matesiii/). Therefore, the ARB land use guidance does not provide enough resolution to determine whether the health risk from the propose project would be below 10 in a million over a 70-year residential exposure period.

   The air quality analysis also cites ARB idling restrictions and favorable wind directions as additional proof that HRA is not necessary. Although state law restricts idling to five minutes at a time, idling can occur multiple times on-site. SCAQMD staff suggests a default of 15 minutes of idling, unless it can be shown that the proposed project can limit the idling by design or other mitigation. Depending on the number of start-ups and shutdowns required within the queue to be filled, the total idling on-site may be longer. A discussion on the activities of the trucks on-site, such as the number of trucks queuing should be included in the Final CEQA document.

In addition, SCAQMD requires that SCREEN3 use full meteorology. Since SCREEN3 was used by the consultant for air dispersion modeling, favorable wind direction would not be utilized in the analysis. Also, a map identifying the proposed project, receptors and wind rose should be provided for any claim of favorable wind direction.

Therefore, the lead agency's consultant's arguments are not valid reasons from not completing a health risk assessment. A health risk analysis using a 70-year exposure should be done for residential and occupational receptors surrounding the proposed project.

8. The risk assessment completed for the worker appears to use the SCREEN3 modeling used for the criteria pollutant LST evaluation. As stated above, the concentrations estimated by the SCREEN3 modeling prepared by the consultant are underestimated. SCREEN3 modeling for the HRA should be done with the full meteorology option or ISCST3 should be used with meteorological data from the closest meteorological station.

9. The text states that the nearest sensitive receptor is located 350 meters away. A map should be included that identifies the proposed project, receptors, the maximum individual cancer risk (MICR) for off-site residential/sensitive receptors, etc.

Operational Mitigation Measures

10. If the lead agency should determine that operational emission estimates will exceed the SCAQMD daily significance thresholds for NOx, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce NOx air quality impacts from the project:

    Recommended Additions:

    - Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors;
    - Restrict or re-route truck traffic way from sensitive receptors, in particular, restrict or prohibit truck traffic;
    - Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue;
    - Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities;
    - Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
    - Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods;
    - Improve traffic flow by signal synchronization;
    - Use street sweepers that comply with SCAQMD Rules 1186;

- Require or provide incentives to use low sulfur diesel fuel with particulate traps;
- Use alternative fueled off-road equipment;
- Conduct air quality monitoring at sensitive receptors;
- Electrify service equipment facility; and
- Require or provide incentives to use particulate traps.