



South Coast  
Air Quality Management District

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**FAXED: FEBRUARY 12, 2008**

February 12, 2008

Ms. Gina Gibson  
Development Services Department  
Planning Division  
City of Rialto  
150 South Palm Avenue  
Rialto, CA 92376

Dear Ms. Gibson

**Mitigated Negative Declaration (MND) for the Kinder Morgan  
Colton Terminal 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 in the final Mitigated Negative Declaration (MND).

The lead agency should be aware that the SCAQMD received the MND on January 22, 2008. As a responsible agency, the SCAQMD was not allowed the full 30 days to review the document prior to the public hearing on February 13, 2008, pursuant to CEQA Guidelines 15105(b). If the lead agency requested a shortened review period for the proposed project, it did not contact the SCAQMD as required by CEQA Guidelines 15105(d)(3).

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated 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 Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment  
SS:CB

Control Number: SBC080122-04

## **Mitigated Negative Declaration (MND) for the Kinder Morgan Colton Terminal Facility**

### **1. Project Construction Emissions:**

Table 1-1 on page 21 of the MND shows emissions from construction equipment. A review of the Technical Memorandum provided by the lead agency's consultant shows a discrepancy in the emission factor for the dozer. SCAQMD staff was unable to locate a dozer emission factor for NO<sub>x</sub> of 1.622 pounds per hour. If the horsepower rating of the dozer is not known, the composite emission factor of 3.4143 pounds per hour should be used and the construction analysis should be revised, especially given the fact that the peak daily NO<sub>x</sub> emissions of 96.7 pounds per day are so close to the construction NO<sub>x</sub> significance thresholds of 100 pounds per day.

### **2. Construction NO<sub>x</sub> Emission Reduction Measures**

If the NO<sub>x</sub> emissions in the revised construction analysis (see comment #1) exceed the construction significance threshold for NO<sub>x</sub> emissions, SCAQMD staff recommends that the lead agency require the control measures for combustion engines on page six of the Technical Memorandum as mitigation measures. Additional mitigation measures to reduce NO<sub>x</sub> emissions may include the following measures:

- For construction equipment, as well as trucks that would be supplying materials to the project site, require the use of an alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use particulate filters and oxidation catalysts.
- Use electricity from power poles onsite instead of from temporary diesel- or gasoline-powered generators.
- Require trucks to be properly tuned and maintained.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.

### **3. Localized Impacts (Significance Thresholds) Analysis**

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. It is noted on page 26 of the MND that though the area is zoned for heavy and medium industry, there are about eight residential housing structures located west of South Riverside Avenue along West Santa Ana Avenue. SCAQMD staff recommends for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: [www.aqmd.gov/ceqa/handbook/LST/LST.html](http://www.aqmd.gov/ceqa/handbook/LST/LST.html).

Note that localized impacts analysis should be done for both construction and operation.

#### **4. Reducing Operational Emissions**

In the discussion of operational emissions on page 22 of the MND, the lead agency mentions reducing potential VOC emissions from 0.08 lbs/1,000 gallons of gasoline loaded to 0.02 lbs/1,000 gallons of gasoline loaded for the existing loading racks. The lead agency does not describe what modifications would be made to the loading racks to achieve those emission reductions. Please elaborate on this in the Final MND. Further, the lead agency does not mention what the throughput for the storage tanks or the loading racks is. Throughput is necessary to calculate total daily VOC emissions during operation for the proposed project. Once total daily VOC emissions are calculated they should be compared to the operational VOC significance threshold of 55 pounds per day and a significance determination made.

#### **5. Other Issues**

A sump is mentioned as part of the proposed project. Please note in the Final MND that the sump would be subject to the requirements of SCAQMD Rule 1176 – VOC Emissions from Wastewater Systems.

Please include the throughput and emissions calculations for the loading racks/storage tanks in the Final MND.

The BACT/LAER discussion for the vapor combustion system on page 22 did not quantify VOC, NO<sub>x</sub> or CO emissions. Please include these in the Final MND.

The grading/disturbance of soil for the proposed project was discussed without any reference to potential SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil - applicability and requirements. Please include this discussion in the Final MND.

#### **6. Heavy-Duty Truck Emissions**

In addition to not quantifying peak mass daily emissions during operation of the new tanks, loading rack and combustion system, the lead agency did not quantify emissions from heavy-duty haul trucks that would be delivering product to customers. The lead agency needs to identify the number of new heavy-duty haul trucks visiting the facility, vehicle miles traveled, appropriate on-road emission factors, quantify the peak daily emissions from the haul trucks, and compare the results to the applicable operational significance thresholds.

#### **7. Mobile Source Health Risk Assessment**

With the designation of diesel particulates as a carcinogen by the California Air Resources Board, the health impacts of diesel particulates from truck traffic for the proposed need to be assessed. The SCAQMD has prepared a methodology for performing an air toxics health risk analysis for truck emissions. This methodology can be accessed at the SCAQMD website at:

[http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html).