



South Coast  
Air Quality Management District

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Ms. Nancy Hutar, Project Planner  
Development Services Department  
Planning Division  
City of Perris  
135 North "D" Street  
Perris, CA 92570-1906

**Draft Environmental Impact Report (Draft EIR) for the Proposed Industrial Developments International Markham Business Center (formerly IDI Intex)**

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 Environmental Impact Report (Final EIR).

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

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:GM

RVC080730-01  
Control Number

### Air Quality Analysis

1. Tables III-1-C (Estimated Daily Construction Emissions); III-1D (Estimated Daily Project Operation Emissions (Summer); and III-1-E (Estimated Daily Project Operation Emissions (Winter) in the Draft EIR should be identified as “unmitigated” or “unmitigated” emissions. In addition, all three tables have “Exceeds Thresholds?” answering “yes” or “no” but do not identify what those daily thresholds are or identify the thresholds source. These tables should be revised in the Final EIR showing each daily significance threshold and cite their source.
2. From the URBEMIS2007 computer model output sheets in the air quality analysis in the Draft EIR, the lead agency shows unmitigated construction estimates of 90.78 pounds per day of volatile organic compounds (VOC); 1,027.65 pounds per day of oxides of nitrogen (NOx); 815.61 pounds per day of carbon monoxide (CO); 190.54 pounds per day of (PM10) fugitive dust; and 41.26 pounds per day of PM (2.5). In Table III-1-C Estimated Daily Construction Emissions, the table shows construction emission estimates that are much lower and inconsistent with the estimates shown in the URBEMIS2007 output sheets. The lead agency has also switched on the mitigation measure watering three times daily applying a 61 percent control efficiency to the unmitigated PM10 fugitive dust total reducing construction PM10 fugitive dust emission estimate to below the SCAQMD recommended daily significance level of 150 pounds per day.

In the Final EIR, Table III-1-C should be revised to so that the modeling output sheet unmitigated and mitigated air quality impact totals are consistent and that both unmitigated and mitigated emission estimates are reflected in Table III-1-C.

3. Table III-1-C should further detail the source emission categories for construction by showing fugitive dust emissions for grading and soil import and soil import haul truck emissions in the Final EIR.

### Construction Mitigation Measures

4. Because the lead agency has determined that construction air quality impacts exceed the recommended SCAQMD daily significance thresholds for volatile organic compounds (VOC), oxides of nitrogen (NOx), carbon monoxide (CO) and particulate matter (PM10) fugitive dust (see also comment #2), the SCAQMD staff recommends the following changes and additional mitigation measures to further reduce construction VOC, NOx, CO, and PM10 (fugitive dust), if applicable and feasible:

Recommended change:

#### VOC

**MM Air 2:** All retail/commercial/industrial land uses ~~greater than 45,000 square feet of floor space~~ shall apply paints using either high volume low pressure

(HVLP) spray equipment with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency, other application techniques with equivalent or higher transfer efficiency, or by hand.

Recommended additions:

- Use required coatings and solvents with a VOC content lower than required under Rule 1113.
- Construct/build with materials that do not require painting
- Use pre-painted construction materials.

#### NOx

Recommended change:

**MM Air 4:** During construction, ~~mobile construction~~ all vehicles and equipment will be properly maintained according to manufacturers specifications at an offsite location, which includes proper tuning and timing of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction.

Recommended additions:

- Require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps and demonstrate that these verified/certified technologies are available;
- Configure construction parking to minimize traffic interference.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Improve traffic flow by signal synchronization.

#### PM10 (Fugitive Dust)

Recommended additions:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

### **Health Risk Assessment**

5. The air dispersion modeling was completed with both discrete and gridded receptors. However, only discrete (sensitive receptors) were presented in the HRA report. In addition to the sensitive receptors, there are also occupational receptors near to the proposed project site (e.g., the facility across Markham Street to the south and facilities to the west). The maximum health risk to occupational receptors should also be reported in the HRA and Final EA. Further, the recommended significance threshold for cancer risk is 10 in one million for the maximum individual cancer risk (MICR), which applies to residential sensitive receptors and worker receptors.
6. The sensitive receptors should be identified (e.g., daycare center, hospital, etc.) in the HRA and Final EA.