



South Coast
Air Quality Management District

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Mr. Adam Villani, Environmental Review Coordinator
Los Angeles Department of Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

**Draft Environmental Impact Report (Draft EIR) for the Proposed Community
Recycling and Resource Recovery Facility in Sun Valley**

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.

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 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,

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

Attachment

SS:DJ:JK:GM

LAC090423-02
Control Number

Sensitive Receptors

1. In the Site Preparation spreadsheets in Appendix D used to calculate localized air quality impacts, one of the spreadsheets shows that during the site preparation phase up to 200 cubic yards of soil will be handled. Review of the URBEMIS2007 output files used to calculate mass daily regional air quality impacts, does not appear to include this assumption. Please clarify whether or not the URBEMIS2007 analysis included the soil handling assumption. If not, the URBEMIS analysis should be revised to incorporate the 200 cubic yards per day soil handling assumption.
2. In the project description on page II-1, the air quality section on pages IV.C-21, and pages IV.C-26-27, the lead agency briefly describes sensitive receptors as “the nearest residence being located to the south approximately 1,800 feet” (about 0.3-mile) from the project location. Other types of uses are considered sensitive receptors such as schools, day-care centers, hospitals, convalescent homes, etc. Further, residences may be located along the proposed truck routes. SCAQMD staff, therefore, requests that the lead agency identify other types of sensitive receptors, if any, that may be located closer to the proposed project site and along the heavy-duty haul truck routes. If other sensitive receptors are located closer to the facility than 1,800 feet, then the construction LST analysis and HRA (see comment #18) need to be revised.

Air Quality Analysis – Operational Impacts

3. On page II-5 of the Draft EIR, the lead agency states that waste delivered to the facility is generated within a 20-mile radius. In Appendix D Air Quality Data Sheets under Operational Emissions, which estimate existing and future operational emissions, the lead agency uses passenger vehicle trip lengths of 12.7 miles and 13.3 miles for delivery trucks, which were derived from the URBEMIS2007 computer model. The trip lengths in the URBEMIS2007 model are average trip lengths provided by the Southern California Association of Governments (SCAG) and are used when specific project distances are unknown. Since the trip origins and destinations are known, the SCAQMD staff recommends that they be used to calculate operational air quality impacts. Using existing trip lengths for the analysis of operational air quality impacts would provide a much more accurate evaluation of air quality impacts. If existing trip lengths are not used for the analysis, then a more conservative approach using a trip length of 20 miles should be used. In either case, air quality impacts should be recalculated.
4. In the operational emission estimates in Appendix D (Air Quality Data Sheets), the lead agency used EMFAC2007 composite emission factors for passenger vehicles and delivery trucks developed by the SCAQMD using the BURDEN2007 model. It appears that passenger vehicles are the same as public vehicles (Draft EIR, page IV.H-3), which includes small dump trucks. Since there is no breakdown of the public fleet, i.e., percent pick-up trucks, percent vans, percent small dump trucks, etc., it may be more appropriate to use the delivery truck emission factors. Similarly, since it is likely that the collection vehicles, transfer trucks, and recyclable material

trucks are considered to be heavy-heavy-duty vehicles, the heavy-heavy-duty on-road vehicle emission factors should be used (www.aqmd.gov/ceqa/handbook/onroad/onroad/onroadEFHHDT07_26.xls). Therefore, the operational air quality impacts should be revised in the Final EIR using the more appropriate on-road EMFAC2007 emission factors as described above to avoid underestimating operational air quality impacts.

5. Appendix D has a spreadsheet titled Operation Emissions. In the spreadsheet, criteria pollutant emissions are calculated for passenger and delivery vehicles based on the number of daily trips. Although the total number of new daily trips from truck and passenger vehicles is shown on page IV.C-26, the traffic report is listed as a reference for the daily trips. The Traffic Study for the Community Recycling and Resource Recovery Center, Los Angeles, California, dated January 2008, by Fehr & Peers and Kaku Associates appears to present only peak AM and PM trip data, not the total daily trips. It is unclear how the daily trips were developed from the data in the traffic report. A spreadsheet titled Vehicle Traffic presents fractions of delivery trucks, but no description on how these values were developed is presented in the Appendix. Detailed documentation should be included in the Final EA that demonstrates to the public how the number of daily trips for each vehicle type was derived.
6. Page IV.C-24 states that an ozone emission rate of 0.0094 grams per second of ozone based on stack tests and design flow rates (100,000 cubic feet per minute) were used. No references are provided. The Final EA should reference the stack tests and design parameter sources.

Construction Mitigation Measure

7. If the revised construction air quality analyses requested in comments #1, #2, #3, #4, and #5 result in significant adverse construction air quality impacts, the following mitigation measures are recommended by SCAQMD staff:

Recommended changes:

- Sweep daily if visible soil is carried onto adjacent public paved roads (with water sweepers with reclaimed water) and all paved construction parking areas and staging areas, and on an as-needed basis.
- Suspend excavation and grading activity when winds (as instantaneous gusts) exceed 15 miles per hour ~~over a 30-minute period or more~~, or when dust becomes a visible problem.

Recommended Additions:

NO_x

- Require construction equipment that complies with CARB Tier 3 exhaust emission requirements. If Tier 3 equipment is not available, use Tier 2

standards equipped with oxidation catalysts and particulate traps. If the lead agency requires the project proponent to implement this mitigation measure, SCAQMD staff requests that it demonstrate that these verified/certified technologies are available.

PM10 and PM2.5 - Fugitive Dust

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered; and
- Replace ground cover in disturbed areas as quickly as possible.

Operational Mitigation Measures

8. If the revised operational air quality impact analysis requested in comments #2, #3, and #4 results in significant adverse operational air quality impacts, the SCAQMD recommends that the lead agency consider the following modification and add the mitigation measures below to those listed in the Air Quality Section on page IV.C-38.

Recommended Change:

C-3 - Facilities will be swept at least once per hour and streets at least twice per day using SCAQMD Rule 1186 1186.1 certified street sweepers or roadway washing trucks (recommend water sweepers with reclaimed water);

Recommended Additions:

- Repair and/or pave Randall and Pendleton Streets as needed to reduce PM10 and PM2.5 dust particles from the broken concrete and exposed dirt described on Page IV.C-14;
- Install signs prohibiting all vehicles from idling in excess of five minutes, both on-site and off-site;
- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements.
- Re-route truck traffic or restrict truck traffic on certain sensitive receptor routes;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Alternative fueled off-road equipment;
- Design the site such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Require the site to clearly define the primary entrance and exit of the facility;
- Require the facility to operate the cleanest vehicles available;

- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue; and
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods.

Project Description

9. CR&RR has a chronic problem of fugitive dust being generated from their construction and demolition (C&D) debris operation. From January 2007 through January 2009, the SCAQMD issued four Notices of Violation for violation of SCAQMD Rule 403 – Fugitive Dust, from the C&D operation, and one Notice of Violation for track-out from one of the entrances to the C&D and greenwaste operation.

Section II, pages II-13 – II-15, of the Project Description discusses canopies and fences including for the area of the C&D debris material operation. Based on the lead agency's description, a 25-foot high fence will run southeast from the greenwaste/foodwaste enclosure along the southwest side of the facility, bordering a neighboring business, to Randall Street and then along Randall Street northeast. Also a canopy will be installed above part of the C&D operation. The lead agency states that the canopy would be a maximum height of 50 feet. Pile height would "not exceed 40 feet." Further, the canopy will "attach to the new perimeter fence," however, is not clear whether the "canopy" will connect with the fence to form a solid barrier preventing fugitive dust from crossing the facility boundary. From the description it appears that there may be a gap between the fence and the canopy along the southwestern border of the property. Such a gap would allow airborne dust to escape over the property line resulting in fugitive dust in violation of SCAQMD Rule 403. Also, it is not clear whether the canopy will extend over enough of the C&D operation to prevent dust from dispersing over the property boundary. Currently, the C&D operation is adjacent to the property line of the facility so that any airborne dust emissions from the C&D operation may cross the property line impacting neighboring businesses, again, in violation of SCAQMD Rule 403.

Section VI, Environmental Impact Analysis, C. Air Quality, does not specifically address fugitive dust emissions from the C&D operation. SCAQMD staff requests that the fence in the area of the C&D operation extend up to connect with the canopy to form a solid barrier and that the canopy, or roof, extend from the Randall Street edge of the C&D operation to the beginning of the greenwaste/food waste enclosure, so that the C&D operation is enclosed on three sides with a top and only open on one side, i.e. the northeast side. SCAQMD staff further recommends reducing the opening size of the enclosure to the minimum size necessary for entry and operation and then venting the resulting partial enclosure to a particulate collection and control system.

Odor Control

10. The text of the Chronic Non-cancer HI – Cumulative, Objectionable Odors discussion on page IV C-30-31, mischaracterizes the relationship of odor problems at CR&RR relative to SCAQMD Rule 410 - Odors from Transfer Stations and Material Recovery Facilities. The lead agency states, “In response to concerns over continued odor complaints, the applicant is required to submit an Odor Management Plan to SCAQMD per Rule 410.”

SCAQMD Rule 410 was adopted October 6, 2006 and requires that an owner or operator of a facility subject to the rule, i.e. a transfer station receiving municipal solid waste and/or a material recovery facility, which would include CR&RR’s front yard facility, to obtain either a SCAQMD-approved Rule 410 Odor Management Plan (OMP) or an LEA-approved Alternative Odor Management Plan (AOMP). CR&RR chose to apply for and did obtain an AOMP, which was approved by the LEA as recorded in a letter to the Waste Board dated September 16, 2008. The AOMP had to meet mitigation requirements of the Waste Board and LEA.

The OMP was required pursuant to Rule 410 because of the type of facility at the location and was not specifically required because of CR&RR’s compliance history with SCAQMD. Rule 410 exempts greenwaste chipping and grinding activities, and transfer and handling of construction and demolition debris, both of which are also conducted by CR&RR on the back yard portion of the site. As a result, SCAQMD Rule 410 does not apply to the back yard area.

SCAQMD and CR&RR agreed to a Stipulated Order for Abatement approved by the AQMD Hearing Board in June 2003 to reduce odors that were mainly attributable to CR&RR’s processing of greenwaste and foodwaste. An enclosure for those activities was proposed by CR&RR in December 2004 and is required by the current Stipulated Order for Abatement.

In addition to Notices of Violation issued by the AQMD to CR&RR for creating a odor-related public nuisance from the handling and processing of greenwaste and foodwaste, the SCAQMD also issued CR&RR one Notice of Violation for odor nuisance in November of 2008 for odors from the solid waste processing operation in the front yard. Between January 2007 and January 2009, the SCAQMD issued four Notices of Violation for fugitive dust from the construction and demolition operation and one Notice of Violation for track-out of dust from one of the entrances to the construction and demolition (C&D) debris and greenwaste operation.

Although the facility meets or exceeds LEA AOMP or SCAQMD Rule 410 requirements for the applicable operations at CR&RR, the impacts of both CR&RR’s front yard municipal solid waste operation and back yard greenwaste, woodwaste, foodwaste and C&D operations on the surrounding community go beyond the scope of SCAQMD Rule 410 requirements, which were designed to apply to a wide variety of solid waste transfer facilities.

SCAQMD staff is concerned that CR&RR’s request to the LEA for an increase in throughput volume for all categories of waste including municipal solid waste, construction waste, green waste, food waste and wood waste will result in a

corresponding increase in emissions and odors. The proposal for an enclosure with control system in the back yard is likely to reduce particulate emissions and odors from greenwaste, wood waste and food waste handling and processing. The proposals for reducing odors and emissions from the municipal solid waste and C&D debris do not include complete enclosures or venting of emissions to control devices. If the proposed increases in throughput volume are approved, but the municipal CD operations are not controlled more effectively, future public nuisance and fugitive dust violations from those operations are likely.

For the tipping floor located in the front yard MRF area, the lead agency proposes a new canopy type of roof structure with handheld or overhead misting nozzles to control odors; however, not all of the area where municipal solid waste is received will be enclosed. Due to the nature of the waste and changing wind conditions, the use of a partial covering could leave the surrounding community exposed to particulate emissions and odors, creating the potential of continued public nuisance violations for the facility. Therefore, the SCAQMD staff requests that the front yard tipping floor area located in the MRF area also be fully enclosed and that an air filtration system, similar to the system planned for the proposed enclosed building in the back yard tipping floor area, be used to control particulates and odors from municipal solid waste delivered to the MRF as well.

Traffic Routes

11. One proposed route for truck travel is for trucks northbound on the Interstate 5 Freeway to exit at Penrose Street, turn right at Penrose and then left onto Bradley Avenue, proceeding up to Tuxford Street. This route will take trucks past six residences on Bradley Avenue. Due to the large amount of truck traffic and dust already in the area, SCAQMD staff recommends not using Bradley Avenue between Penrose and Tuxford to avoid travel near residential areas. Staff also recommends against routing any truck traffic northbound on Sheldon Street between Laurel Canyon Boulevard and San Fernando road to prevent trucks passing directly by Byrd Middle School, Los Angeles Unified School District. Instead, SCAQMD staff recommends that CR&RR evaluate alternative routes that will have the least impact on sensitive receptors (residences, schools, playgrounds, athletic facilities, long-term health facilities, rehabilitation centers, convalescent centers and retirement homes).

Health Risk Assessment

12. Page IV.C-26 of the Draft EIR, the lead agency states that PM10 emissions rates of 0.913 grams per mile for travel and 1.159 grams per hour for idling were generated by EMFAC2007. No additional information or output from EMFAC2007 is provided. The EMFAC2007 output or input parameters used for the analyses such as geographic area (e.g., basin, county or district), time period (e.g., annual, winter, or month), temperature, relative humidity, etc., should be documented so the public can verify emission factors and duplicate the analysis. When EMFAC2007 is run for Los Angeles County, Winter, 70°F, 40 percent relative humidity the emission rates are

1.375 grams per mile for travel and 2.486 grams per hour for idling for 2009. Based on these results, the emission rates used by the lead agency appear to be low. The Final EIR should document the input parameters and if the results cannot be duplicated, the HRA should be rerun.

13. Page IV.C-26 of the Draft EIR states that the emission rate for the air dispersion model is based on an onsite truck route length of 0.0568 mile (which was confirmed from the spreadsheet in Appendix D). However, the emission rate estimated based on this distance is applied to a line source in the air dispersion model that is 250 meters (0.155 mile) long. Therefore, emissions are applied over a line source that is 2.7 times longer than the length that should have been used. If the 0.0568 mile is correct, then the emissions may be artificially diluted over the longer line source. If the 0.155 mile is correct, then the emission rate is under estimated. This inconsistency should be corrected in the Final EIR.
14. The analysis of operational emissions in Appendix D shows that the proposed project will result in an increase in the number of truck trips by 280 trips per day. Further, the trip length shown is 13.3 miles. Since the recyclable materials are sent to Lamont 100 miles away (Draft EIR, page II-7) and non-recyclables are sent to either Sunshine Canyon 12 miles away or Chiquita Canyon 24 miles away (Draft EIR, page IV.H-3), it is not clear whether or not the operational criteria pollutant analysis includes emissions from new trips to these facilities. Similarly, it is not clear if these trips are accounted for in the HRA. If these trips are not included in either analysis, then both the operational criteria pollutant analysis and the HRA should be redone to include the emissions from these new trips.
15. It appears that only a single receptor was included in the air dispersion modeling/health risk analysis. Page IV.C-26 identifies the receptor has the nearest residential property 1,800 feet southwest of the proposed area of construction. All sensitive, residential and worker receptors should be identified and included in the air dispersion modeling/health risk analysis. Based on a review of Figure IV.G-1, the proposed project is surrounded by worker receptors. SCAQMD health risk assessment guidelines require that discrete and gridded receptors are used to estimate health risk from sources (<http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>, http://www.aqmd.gov/prdas/AB2588/AB2588_B3.html and http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). The Final EIR should include both discrete and gridded receptors that represent all sensitive, residential and worker receptors that may be adversely impacted from the proposed project.
16. No maps with receptors and health risk isopleths are included in the Draft EIR. It is unclear from the materials provided if the spatial distances in the air dispersion model are correct, without maps that show sources, facility boundaries, and receptors. A map that shows sources, facility boundaries, and receptors should be included in the Final EIR.