



South Coast Air Quality Management District

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Review of the Final Environmental Impact Report (EIR) for the Proposed Liberty Quarry Project

The South Coast Air Quality Management (AQMD) staff appreciates the opportunity to comment on the proposed project. The AQMD staff previously submitted comments on the Draft EIR on November 20, 2009 and appreciates revisions made to the air quality analysis in the Final EIR. Stationary permitted equipment at the proposed Liberty Quarry project are subject to AQMD's New Source Review Program which will require use of Best Available Control Technology (BACT) which is state-of-the-art air pollution controls. In addition, the proposed project includes the cleanest off-road equipment and dust control strategies to reduce fugitive emissions. However, the Final EIR demonstrates that certain air quality impacts from the construction and operation of this project will remain significant based on AQMD's significance thresholds. The existing air quality analysis meets the AQMD's standards of analysis, however, the AQMD staff is requesting three further items to be incorporated into the proposed project.

As you are aware, the Health Risk Assessment presented in the Final EIR demonstrates that carcinogenic risks are just below significance thresholds. In order to ensure that these risks stay below a significant level and to further mitigate operational emissions, additional measures should be added prior to adopting the Final EIR. These include enhancing the Clean Truck Fleet mitigation already included in the Final EIR, incorporating alternative energy generation onsite to the extent feasible, and including AQMD staff in air monitoring activities.

Clean Truck Fleet Mitigation

As diesel exhaust is a major source of emissions from the project, and the largest contributor to potential health risks, additional mitigation should be taken to reduce the impacts, especially from the heavy duty trucks serving the proposed project. AQMD staff recommends that mitigation measure AQ-3j be replaced with the following measure:

- The project proponent will use a Clean Truck Fleet that meets the following requirements:
 - At commencement of project operations, all on-road heavy duty diesel trucks serving the facility will comply with EPA 2007 on-road emission standards for PM10 and NOx (0.01 g/bhp-hr and at least 1.2 g/bhp-hr, respectively)

- The Clean Truck Fleet Program will include enforcement mechanisms to ensure compliance, such as through lease agreements or other contractual agreement and real-time database verification systems when trucks enter the site.

Onsite Power Generation

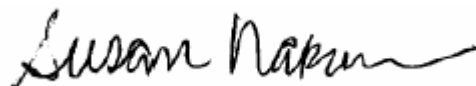
The proposed project includes constructing and operating a 14 MW natural gas fired power plant. In order to reduce the size of this plant to the maximum extent feasible, and to demonstrate the project proponent's commitment to alternative energy production, the facility should install non-fossil fuel based power generation onsite to the maximum extent feasible. If sufficient land is not available for a solar array, at a minimum the proposed project should include placing solar panels on buildings or providing shade coverings with solar panels above permanent scales.

Air Monitoring

The AQMD staff believes that air monitors at the proposed site are a useful tool to further ensure public health protection from all measured contaminants including crystalline silica. The AQMD staff is available to participate in developing the monitoring protocol and verifying monitored data collected pursuant to mitigation measure AQ-3k for this project.

With the inclusion of these measures, this project could become a leader in the industry for its commitment to reducing air quality and health impacts. AQMD staff looks forward to continuing to work with the lead agency and the project proponent to improve air quality in the region. Please contact me at (909) 396-3105 should you have any questions regarding these comments.

Sincerely,



Susan Nakamura
Planning Manager
South Coast Air Quality Management District