South Coast
Air Quality Management District

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Air Quality Analysis & Air Toxics Risk Assessment for the Proposed Transfer Station Project: E. Los Angeles Recycling & Transfer Station, E. Los Angeles, CA

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned analysis and assessment document. The following comments are meant as guidance for the Lead Agency and should be incorporated as supporting documentation to the draft CEQA document released for public comment.

In the project description, the lead agency has proposed to increase throughput to an existing waste transfer station from 700 to 1,500 tons per day on a site that would include construction of a 19,000 square foot transfer building. The increase in throughput, according to the project description, would result in an increase in vehicle traffic emissions. Although the analysis does not include a specific breakdown of the proposed vehicle fleet mixture operating at the site from the proposed throughput increase, the AQMD staff has concerns regarding the percentage of heavy duty trucks assumed in the fleet mixture percentage; the daily truck trip rate used to estimate the number of trucks operating at the site; and the operational emission estimates from these assumptions in the air quality analysis.

Based on the AQMD staff review, the AQMD staff recommends that the lead agency provide further justification for the fleet mixture and daily truck trip rate assumed in the CalEEMod modeling. Specifically, the lead agency has assumed a fleet mixture that includes approximately six percent of heavy duty trucks in the CalEEMod land use model input files. Since the majority of vehicles coming to the site would be expected to be refuse collection and transfer trucks, the AQMD staff is concerned that the percentage of heavy duty trucks is significantly underestimated and should be revised in any succeeding air quality analysis or any other applicable study. In addition, the lead agency also uses the default daily overall trip rate of 2.8 vehicles per 1,000 square feet for the proposed general heavy industrial land use. This results in approximately 54 additional vehicles, only 3 of which are heavy duty trucks, from the proposed 19,000 square foot increase of area at the transfer station.

As an example of how this may underestimate truck trips and subsequent emissions, based on the proposed increase of 800 tons per day of throughput and assuming approximately 20 tons of waste per exported truckload, the project would include approximately 40 new heavy duty transfer truck export trips per day. This estimate does not include the additional trucks importing waste to the site. As another example, a transfer station project with a similar amount of throughout (Pomona Valley Transfer Station, City of Pomona, Draft EIR SCH# 2009051126), assumed a trip rate of 12.14 trips per 1,000 square feet of land use and a total fleet mixture made up of 40 percent heavy duty trucks. The AQMD staff therefore recommends that the lead justify the trip rates used in its analysis. Otherwise, operational air quality impacts and health effect estimates from trucks operating at the site will likely be substantially underestimated resulting in potentially significant impacts.

Please provide the AQMD with the draft CEQA document and all applicable supporting documentation including electronic files when the draft CEQA document is circulated during the public comment period. The AQMD staff is available to work with the Lead Agency to address issues mentioned in this letter and any other air quality 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,

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