



South Coast Air Quality Management District

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County of Los Angeles

Department of Regional Planning

320 West Temple Street, Room 1346

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Transfer Station Project: East Los Angeles Recycling & Transfer Station.**

In a previous letter dated June 1, 2012, the AQMD staff made initial comments concerning the above-mentioned analysis and assessment document and the consulting staff then as a result of those comments resubmitted the modeling inputs to AQMD staff. The two analyses estimate impacts for the proposed 800 tons per day increase from 700 to 1,500 tons per day at the existing facility that would include construction of a 19,000 square foot waste transfer building. The following comments are a result of a review of the Draft IS/MND, the two analyses, and a subsequent Odor Control Analysis submitted by County of Los Angeles Department of Public Works, Environmental Programs Division staff. These comments are meant as guidance for the Lead Agency and should be incorporated into the final CEQA document. Detailed comments are attached. Although the SCS Engineering consulting staff contacted the AQMD staff directly concerning the supporting analyses, the AQMD staff does not have record of receiving the entire Draft MND from the lead agency during the public comment period. Upon request, the lead agency sent the Draft IS/MND as an e-mail attachment to AQMD staff on November 14, 2012. Finally, the AQMD staff also received on January 7, 2013 as an e-mail attachment an Odor Control Analysis concerning the proposed project from the County of Los Angeles Department of Public Works, Environmental Programs Division staff.

The AQMD staff still has concerns including the CalEEMod land use modeling inputs and the vehicle fleet characteristic assumptions used to estimate project operational air quality and health effects impacts. As mentioned in the June 1, 2012 letter, justification is still needed for the use of the 1.5 vehicle trip rate in the air quality impact and air toxics risks. In addition, the lead agency should break down the actual vehicle fleet mixture in the analyses. For example, the percentage breakdown of waste collection trucks, transfer trucks, privately owned vehicles, employee vehicles, etc., should be detailed. Next, the operating vehicle trip lengths need to be described, i.e., distances of waste collection trucks coming to the site, worst-case distances for disposal destinations of the transfer trucks, distances of other privately owned vehicles, employee vehicles, etc. The fleet

mixture, vehicle trips and vehicle miles traveled should also be consistent throughout the draft CEQA document and applicable analyses. Without this information, the operational air quality impacts and health effect estimates from trucks operating at the site will likely be underestimated and could result in potentially significant impacts.

Finally, the AQMD staff has concerns about the January 7, 2013 e-mail attached Odor Control Analysis sent to AQMD staff from the County of Los Angeles Department of Public Works, Environmental Programs Division staff. The AQMD staff is concerned that the lead agency's conclusion that project facility odors impacts are less than significant is not supported by data presented in the odor study appendix.

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,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachments

IM:GM

LAC120511-07
Control Number

Air Quality Analysis - Operations

Truck Trip Rate

1. In the Excel Spreadsheet inputs provided for review, the CalEEMod land use model was used to calculate the project operational emissions from vehicles operating at the proposed expansion site (transfer trucks, waste collection trucks, employee vehicle trips, etc.). For the daily operational trip rate, the lead agency assumed a truck trip rate of 1.5 per thousand square feet of land use from the Institute of Transportation Engineers 8th Edition for the General Heavy Industry land use number 150.

With the 1.5 vehicles per 1,000 square feet, approximately 85 vehicles per day are estimated to operate at the proposed expansion site (56.6 times 1.5). Included in this estimate of 85 vehicles, based on the fleet mixture found in the modeling inputs, are two heavy trucks (including waste or transfer trucks). This number of trucks, as a percentage of the vehicles estimated to operate at the proposed expansion site, is not what would be expected given the project's land use. As an example of a trip rate used by another lead agency for a similar land use, the City of Pomona used a trip rate of 12.14 per 1,000 square feet of land use in its estimates for the Pomona Valley Transfer Station (City of Pomona, Draft EIR SCH#209051126). In addition and as mentioned in our previous letter, the proposed increase of 800 tons per day of throughput would include approximately 40 new heavy duty transfer trucks export trips per day (assuming approximately 20 tons per waste per exported truckload). The 40 trucks used in the example would also not account for the additional trucks importing waste to the site.

Therefore, the AQMD staff believes further justification for the trip rate used in the modeling and other related analyses should be made in any subsequent CEQA document and supporting analysis. Otherwise, operational impacts could be significantly underestimated in the circulated CEQA documents and related analyses. In the case that the lead agency chooses to use the lower rate, then project conditions should be added to ensure that the project is limited to the specified throughput.

Fleet Mixture

2. In the CalEEMod inputs, the lead agency also assumed a fleet mixture that includes only two percent of heavy duty trucks (including refuse and transfer trucks). Since the majority of vehicles coming to the site would be expected to be refuse collection and transfer trucks, a greater percentage of heavy trucks would be expected in the analysis. Therefore, further justification for the lead agency's assumed percentage of heavy duty trucks should be made in any subsequent CEQA document and analysis. Otherwise, the AQMD staff is concerned that the percentage of heavy duty trucks is significantly underestimated and could result in significantly underestimated operational impacts. The fleet mixture percentage should also be revised in any succeeding air quality analysis or any other applicable study.

Truck Trips Lengths

3. In the CalEEMod input files provided to AQMD staff by the lead agency, a one-way default trip length of 13.3 miles was used to estimate operational air quality impacts for the vehicles operating at the proposed expansion of the existing transfer station (waste collection trucks, transfer trucks, landscape trucks, etc.). Since waste collection trucks operating from the proposed project might handle waste from local municipalities and perhaps other collection services, the operating range distance should be described in the circulated CEQA document and any applicable analysis. In addition, the transfer truck destinations and distances should also be disclosed along with distances anticipated for privately owned vehicles that might bring waste to the facility. A brief discussion and mileage estimate for employee vehicles should also be included. After these distances have been described, a reasonable average trip length for related vehicles could be determined and used in the model to estimate project impacts. If the lead agency is uncertain of the destinations of the transfer trucks or the trip lengths, the lead agency could limit activities, as a condition of use for the expansion, to levels described in the analysis. Otherwise, long-term project air quality impacts for operations could be substantially underestimated.

Heavy Duty Diesel Collection and Transfer Vehicles

4. The proposed project will use heavy duty trucks to transfer waste from the ELARTS Recycling and Transfer Station to landfill(s) destinations that were not disclosed in the analysis. If a governmental agency owns or contracts out the disposal services at the existing site or project expansion, the lead agency should cite compliance with SCAQMD Rule 1193 - Clean On-Road Residential and Commercial Refuse Collection Vehicles for any future CEQA documents or applicable analysis. This rule applies to public and private solid waste collection fleet operators that operate solid waste collection fleets with 15 or more solid waste collection vehicles and private fleet operators that provide solid waste collection services to governmental agencies to acquire alternative-fuel refuse collection heavy-duty vehicles when procuring or leasing these vehicles for use by governmental agencies in the South Coast Air Quality Management District. The purpose of this rule is to reduce potential air toxic and criteria pollutant emission impacts from solid waste collection fleets including waste collection and waste transfer trucks.

Should the lead agency determine that the proposed project expansion will have significant regional emissions, the lead agency should consider additional mitigation to reduce the impacts from third party trucks that utilize the facility that are not subject to AQMD Rule 1193. As an example, this could include requiring that any heavy duty diesel truck operators that regularly use the facility to apply in good faith for funding to either retrofit or replace their engine from an established ARB or AQMD funding program (such as Carl Moyer, VIP, Prop 1B, etc.).¹

¹ <http://www.aqmd.gov/tao/Implementation/index.htm> and http://www.arb.ca.gov/msprog/truckstop/azregs/fa_resources.php

Odor Study and Odor Control Management Plan

5. On January 7, 2013, County of Los Angeles Department of Public Works, Environmental Programs Division staff sent an Odor Study (East Los Angeles Nasal Ranger Report, NCM Odor Control Company) as an e-mail attachment to AQMD staff. The email transmitted documents included a one and a half page summary dated January 7, 2013 and data apparently from five sampling days in December 2012. The study was performed by NCM Odor and Dust Control. According to information received from the facility by AQMD, NCM Odor Control provides the neutralizer used at the facility. The study provides some information about odors detected nearby to the facility but has several problems. The study could have provided additional and more relevant information relative to actual and potential odors from the facility. The following comments address the summary and the sampling data:

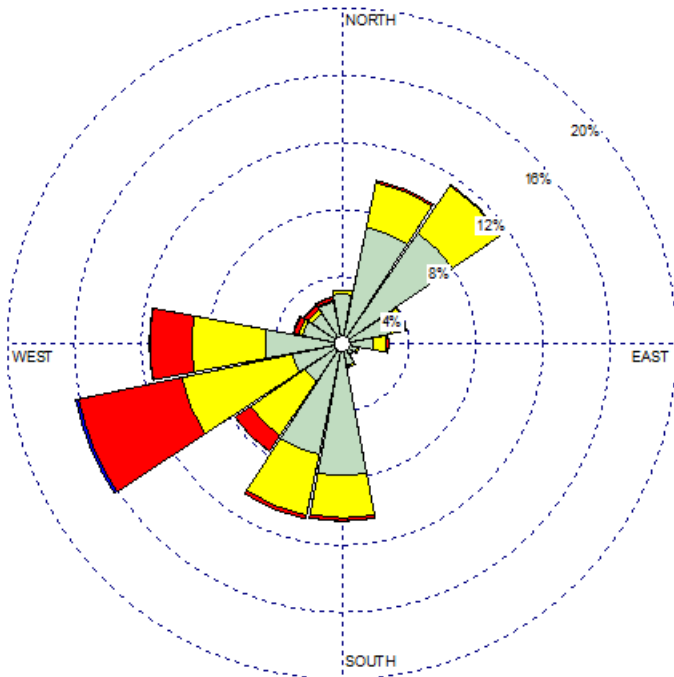
- The summary states that the detectable odors were found to be a sweet smell from Mutual Flavors and a leather odor from Harland Braun. However, the data sheets note trash and neutralizer odors on a number of dates and at various locations. Presumably, these odors were from the transfer station facility.
- Most of the readings were done in the morning yet the AOMP states that the facility accepts trash Monday – Saturday, 6:00 AM – 9:00 PM and operates 24 hours per day.
- The data sheets titled December 21 and 28 have different dates for the observations.
- The data sheets do not indicate wind direction for the odor observations, however the summary states the winds were from the “westerly directions”. The summary does not state how this wind direction information was obtained. Most locations in the basin have different air flow directions during the day versus the night.
- The study would have benefitted by including an historical wind rose and an analysis of daily and yearly wind patterns and their relation to receptors, particularly residential. The Central Los Angeles Annual Wind Rose is included on page seven for the lead agency’s convenience.
- The data rely on observations taken with the Nasal Ranger, an air sample dilution instrument. From the presentation of the data and from review of the Nasal Ranger operation manual, it appears that all samples were diluted by at least an equal volume of charcoal filtered air. While this provides relevant information about the strength of odors, the approach has the weakness that neither the SCAQMD nor the State of California has odor regulations based

on dilution factors. The SCAQMD enforces odor nuisance based on complaints by residents and workers which are verified by AQMD inspectors. The data presented underestimates potential nuisance odors.

- No information is presented as to an established method for the sampling instruments used, nor any accuracy or precision or calibration information. Nor is any information presented relative to training or evaluation of the persons using the instruments.
6. During the past three years the AQMD has received at least five complaints alleging nuisance odor from the facility. AQMD Inspectors responded to two of these complaints, and noted trash odor outside the facility on one response. While the facility has had relatively few complaints, typical of transfer facilities with smaller throughputs, with a change to 1,500 tons per day throughput, the facility will enter the range of throughput, which based on AQMD past experience, has greater potential to generate odor complaints.
 7. On page nine of the Draft IS/MND, the lead agency states that the proposed project is not subject to SCAQMD Rule 410 - Odors from Transfer Stations and Material Recovery Facilities since the incremental increase of waste intake is less than 1,000 tons per day. The facility is currently subject to Rule 410 which was adopted in 2006. At this time the facility is not required by the rule to have an enclosure that meets requirements of Rule 410, but is required to have an odor management plan. The facility provided to the AQMD a "Revised" Alternative Odor Management Plan (Alternative OMP) dated November 2012. There was no indication as to whether the plan was approved by the Local Enforcement Agency (LEA). Rule 410 requires that, "At least 180 days prior to increasing permitted throughput, the owner or operator of a facility update and submit the Alternative OMP with information required by the rule or submit a letter to the LEA as to why the existing Alternative OMP addresses all information required" by the rule. As the proposed modification to the facility is less than 1,000 tons per day and the facility is overall at less than 3,000 tons per day throughput, the facility does not trigger any enclosure requirements of the rule. It is noted that the facility currently has an enclosure with a roof and three sides, with openings with closing doors on the fourth side.
 8. In conclusion, based the review of the data presented in the appendix, the results from the sampling in the study do not seem to support the lead agency's finding that odors are less than significant. Specifically, although there are odors coming from other sources near the existing East Los Angeles Recycling & Transfer Station, the sampling data also shows odors coming from the project site. Therefore, the lead agency should address this discrepancy in the Final MND.

WIND ROSE PLOT:
Central LA

DISPLAY:
Wind Speed
Direction (blowing from)



COMMENTS 1 knot = 1.15 mph 22 knot = 25 mph	DATA PERIOD: Start Date: 1/1/2006 - 00:00 End Date: 12/31/2007 - 23:00	COMPANY NAME:	
	CALM WINDS: 0.00%	MODELER:	PROJECT NO.:
	AVG. WIND SPEED: 4.11 Knots	TOTAL COUNT: 17417 hrs.	

WRPLOT - View-Lines Environmental Software