



South Coast Air Quality Management District

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Ms. Mary J. Jacobs, P.E.
Planning Section
Sanitation Districts of Los Angeles County
1955 Workman Mill Road
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Review of the Draft Environmental Impact Report for the Proposed Santa Clarita Valley Sanitation District Chloride Compliance Facilities Plan

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (EIR) as appropriate.

As stated in the Draft EIR, one of the proposed alternatives for this project will send approximately 90 trucks per day transporting brine a distance of 40 miles from Santa Clarita to a disposal location that would be constructed in east Los Angeles. SCAQMD staff appreciates that the lead agency included a mitigation measure requiring trucks that meet the 2010 standard, and we believe that minor revisions to this measure can further strengthen its implementation. However we request that the Final EIR include additional analysis of this alternative to evaluate potential localized air quality impacts, including from toxic emissions from diesel trucks and potential odors from transported brines. Details regarding these concerns are attached to this letter.

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 EIR. Further, staff is available 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 the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

Attachment
LAC130424-03
Control Number

Mitigation Measure AQ-4

SCAQMD staff appreciates that the lead agency commits to mitigating NOx emissions using 2010 diesel-powered trucks. However, in order to provide more options to meet this reduction, we would recommend the following edit to this mitigation measure.

Original:

The brine hauling contractor shall be required to use a truck fleet consisting of 2010 (or newer) diesel-powered engines.

Revised:

The brine hauling contractor shall be required to only use trucks that meet 2010 EPA standards for NOx and PM.

This revision would allow alternatively fueled trucks (e.g., natural gas, hybrid, electric, etc.) to also be used should they be found feasible. These alternatively fueled trucks also have the benefit of reducing diesel particulate matter emissions (identified as a carcinogenic toxic air contaminant by the California Air Resources Board). Further, because the emission calculations in the Draft EIR assume that all trucks meet the 2010 standard, the measure should indicate that only trucks that meet this standard can be used. The current measure could potentially be interpreted that the fleet only contain some 2010 trucks.

Localized Air Quality Impacts

As stated in the Draft EIR, the proposed offsite disposal site for brines would require approximately 90 trucks per day (~180 trips/day) to travel in close proximity to homes. However the Draft EIR did not evaluate the potential health risks or the potential odor impacts from this activity. SCAQMD staff recommends that the lead agency conduct a Health Risk Assessment (HRA) to determine if truck emissions cause potential risks that could exceed SCAQMD significance thresholds. This HRA should evaluate emissions from A) trucks travelling from the freeway to the disposal site, B) truck movement on the disposal site, C) 15 minutes of idling while at the disposal site, and D) should also account for local traffic conditions. Further, if the brines are a potential source of odors, the potential impacts of these odors on the surrounding community should be evaluated in the Final EIR. If either of these localized impacts (health risks or odors) are found to be significant, additional feasible mitigation should be implemented.