



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Mr. Brad Johnson, Planning Manager
City of Pomona
505 S. Garey Avenue
P.O. Box 660
Pomona, CA 91769

**Draft Environmental Impact Report (Draft EIR) for the Proposed
Pomona Valley Transfer Station Project**

The South Coast Air Quality Management District (AQMD) 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.

The AQMD staff supports the mitigation measures that require an alternative fueled waste collection truck fleet at a rate of 30 percent in 2011, and 90 percent in 2020. In addition, because the project presents a significant health risks to nearby residences, the AQMD staff recommends that the diesel particulate matter retrofits mentioned in Mitigation Measures 4.3.16 and 4.3.17 be applied to all transfer trucks. Also, as the proposed project has the potential to release odors in nearby neighborhoods (outside of non-conforming adjacent residences), the lead agency should consider additional mitigation measures to reduce these impacts to the lowest possible level. Lastly, there are several calculations that appear to be inconsistent with AQMD methodologies. Some of these may result in undisclosed significant impacts. Further clarification of these project impacts based on the attached comments is needed prior to certification of the Final EIR.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein at least ten days prior to the adoption of the Final EIR. The AQMD 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 these comments.

Sincerely,

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

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

Attachment
IM:GM
LAC100323-03

Health Risk Assessment (HRA)

1. Because the lead agency has determined that the proposed project would have significant Diesel Particulate cancer health risks even after considering mitigation, the AQMD recommends the following mitigation measure in addition to those listed in the Draft EIR:
 - In order to reduce the emission of diesel exhaust from trucks serving the facility, diesel particulate traps should be placed on all transfer trucks on an accelerated schedule.
 - The City of Pomona shall require all solid waste collection and transfer trucks to avoid idling on site to the fullest extent feasible. This is defined for the solid waste collection trucks as a maximum of 5 minutes within the designated unloading bays, and no idling allowed for either collection or transfer truck at any other locations on site. Signs shall be posted along the on-site truck routes informing drivers that idling while on site is prohibited, except at the unloading bays, where signs shall be posted informing drivers that idling there is limited to a maximum of 5 minutes while unloading. Enforceability would require the proposed facility staff to monitor idling activity, restrict idling to the idling time used in the HRA (e.g., in the case of the Draft Supplemental EIR five minutes total on-site) and penalties for truck drivers that idle more than the time used in the HRA (fines, loss of contract, etc.)
2. On page 3-39 of the Draft EIR and in mitigation measures 4.3.18 and 4.3.19, the lead agency states that the building will comply with AQMD rule 410 (d)(1)(A) and (d)(1)(B) by using roof-mounted exhaust fans to provide the necessary ventilation rate for all openings into the waste transfer building. In the HRA report, an additional mitigation measure (MM-HRA3) is specified calling for an Alternative Stack Design to reduce potential health risks from project operations. Within the model, this stack design assumes that 17 vents will be located at a height of 35 feet, and will have a flow rate of 1100 cubic feet per second, or 66,000 cubic feet per minute. This ventilation rate provides for an air exchange rate in the building of approximately 27 air changes per hour (using dimensions provided in 3.4-1 and 3.4-3). As MM-HRA3 was not included in the mitigation measures for the Draft EIR, it is unclear if the modeled stack parameters coincide with the measures called for on page 3-39 of the Draft EIR. A more thorough description of building ventilation should be included in the Final EIR, and the HRA analysis should match the physical parameters described for the waste transfer building.

Odor Analysis

3. AQMD staff appreciates that the lead agency included an odor analysis in the Draft EIR given the proposed project's potential for odor impacts. However, it is unclear how the lead agency determines that odors will be a less than significant impact. The odor assessment is based on an analysis of a similar facility (Grand Central Transfer

Station). Assumptions used from the analysis of this facility may not yield comparable results for the proposed project. These include:

- The compounds analyzed were collected during a single weekend when the station was closed, and when only 727 tons of waste was present. The modeling analysis assumed an increased tonnage of 1271 tons. The proposed project is designed to handle a larger volume of 1500 tons per day.
 - The compounds analyzed were also presumed to remain at a constant concentration and ratio for the duration of the modeling analysis. As each compound has different odor thresholds, variations in material disposed may yield contaminant concentrations that vary through time.
 - The analysis assumes that all odors are derived from 17 stacks on the roof of the building, with a flow velocity of 2600 feet per minute. It is unclear how the proposed project's ventilation rate will correspond with those cited for the Grand Central Transfer Station (see comment #10).
 - The analysis assumes that all odorous emissions will come from the stacks on the roof of the transfer building and that no emissions will come from trucks using the facility or facility grounds.
 - The analysis assumes that the misting system is capable of achieving a 45% reduction in odorous compound emissions. Without this reduction, odorous compounds are predicted to reach up to 700 meters away from the facility. The nearest non-conforming residences are within 30 meters of the facility, while the nearest residential neighborhood is only 215 meters to the west. Additional justification is therefore needed in the Final EIR to demonstrate that this misting system is capable of reducing odors by the amount specified.
4. If the lead agency determines that odors present a potentially significant impact after considering the points raised in comment #3 above, all feasible mitigation measures should be considered that can reduce the magnitude of this impact. This can include consideration of additional controls such as carbon filters, biofiltration, scrubbers, etc.

Operational Emissions

5. The PM10 analysis for localized operational emissions appears to underestimate project impacts. In spreadsheet 'Operations Summer Unmitigated', the PM10 is calculated using equation $C_x = 0.9403 * C_0 * e^{-0.0462x}$. In a footnote, a 'conversion factor' of 0.4 is used to reduce C_0 . This does not follow AQMD methodology, and has the effect of artificially underreporting PM10 impacts by 60%. Without the 'conversion factor', the $2.21 \mu\text{g}/\text{m}^3$ reported in the Draft EIR is increased to $5.53 \mu\text{g}/\text{m}^3$. This exceeds the AQMD significance threshold of $2.5 \mu\text{g}/\text{m}^3$. If the lead agency determines that a new significant impact is identified for the project pursuant to CEQA Guidelines §15088.5, a Recirculated Draft EIR may be required.

6. The overall emission rate for fugitive dust from waste handling during operations is unclear. In an unnamed table in the Air Quality technical appendix, an equation is used to determine the total pounds of PM10 emitted per ton of waste. The reference and rationale for this equation are not clear in the Draft EIR, nor is it clear what each of the variables in the equation refer to. In the Final EIR, the lead agency should provide additional justification for this emission rate.
7. On page 4.2-31 in the Traffic and Circulation section of the Draft EIR, the lead agency estimates that collection and self-haul trucks would come from a six mile service area radius but the transfer trucks are expected to travel to landfills in Los Angeles, Orange and San Bernardino counties traveling one-way distances ranging between 17.3 miles (Puente Hills Landfill, City of Industry) to 53.7 miles (Prima Descha Landfill, San Juan Capistrano), as estimated by AQMD staff. In Appendix B - Operational Air Impact Analysis, the lead agency has estimated operational on-road emission impacts using the URBEMIS2007 computer model and a one-way trip length of 6.3 miles. Although the lead agency believes that the six mile one-way trip length is appropriate for collection and self-haul trucks (i.e., that collection and self-haul trucks will not come from cities outside of Pomona), the trip length assumed for transfer trucks is low considering the locations of the various landfills mentioned in the Traffic and Circulation section. In Final EIR, the lead agency should revise the operational emissions analysis to reflect the more realistic trip lengths for the landfills mentioned in the Draft EIR. Otherwise, operational impacts will be substantially underestimated. As an alternative, if the lead agency wishes to use the 6.3 miles one-way figure for transfer trucks, the lead agency should document the source of the trip length and demonstrate that it is appropriate for this proposed project. The lead agency should then include this 6.3 one-way mileage limit as a mitigation measure to reduce regional air quality impacts from the transfer truck operations.
8. The vehicle fleet mix specified in mitigation measures 4.3.16 and 4.3.17 does not appear to be reflected in the URBEMIS model files for operations. Potential reductions in emissions due to installation of particulate traps on diesel engines are available from AQMD.¹ The revised emissions using the fleet mix as specified in mitigation measures 4.3.16 and 4.3.17 should be included in the Final EIR.
9. AQMD staff supports the lead agency's decision to use Tier IV engines in onsite front end loaders during project operations (page. 4.3-71 of the Draft EIR). However, the emission rate used in the emission calculation spreadsheets for NOx (2.85 g/bhp-hr) is greater than either the interim or final Tier IV standard of 1.5 or 0.3 g/bhp-hr, respectively. In the Final EIR, the lead agency should revise the emission rate to reflect the Tier IV commitment.
10. Ambient NO2 1-hour and annual average values are misreported in the Air Quality section of the Draft EIR. Consistent with tables available from AQMD², the highest

¹ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

² <http://www.aqmd.gov/smog/historicaldata.htm>

background NO₂ level is 0.11 ppm (2008), not 0.097 ppm. This change should be reflected in Table 4.3-1 and 4.3-15 in the Final EIR.

11. The peak day localized NO₂ concentration reported in Table 4.3-15 appears to have left off the scientific notation. The value reported in the Air Quality technical appendix is 7.46×10^{-3} . This table should be updated in the Final EIR.
12. The meteorological data used in the PM₁₀ exhaust ISC model run is Long Beach. Consistent with AQMD guidance, and all other model runs, in the Final EIR the lead agency should rerun the model using meteorological data from the Pomona station.

Construction Mitigation Measures

13. The lead agency has determined that construction air quality impacts will exceed the AQMD's daily regional significance threshold for oxides of nitrogen (NO_x), particulate matter PM₁₀ and PM_{2.5} (fugitive dust), and volatile organic compounds (VOC) and localized significance thresholds for PM₁₀ and PM_{2.5} (fugitive dust). In addition to the mitigation measures included on pages 4.3-64 and 4.3-65, other mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust can be found on the AQMD website.³ The AQMD recommends that the lead agency also consider adding the following mitigation measures to further reduce NO_x, PM₁₀, PM_{2.5} and VOC impacts from the proposed project, if applicable and feasible:

Recommended Additional Mitigation Measures:

NO_x

- Prohibit truck idling in excess of five minutes;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable; and
- Reroute construction trucks away from congested streets or sensitive receptor areas.

VOC Emissions from Architectural Coatings

- Use coatings and solvents with a VOC content lower than required under Rule 1113.
- Restrict daily coating usage to less than approximately 65 gallons per day (assuming a VOC content of 1.1 pound per gallon).

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

PM10 and PM2.5 (Fugitive Dust)

Recommended change:

MM 4.3.1 All clearing, grading, earth-moving, or excavation activities shall cease when winds (as instantaneous gusts) exceed 25 mph per AQMD guidelines in order to limit fugitive dust emissions.

Recommended change:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Replace ground cover in disturbed areas as quickly as possible;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water); and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

Potential Export and Disposal of Contaminated Soils

14. In Section 4.5 Hazards/Hazardous Materials on pages 4.5-7 and 4.5-8 of the Draft EIR, the lead agency describes potential soil disturbance during grading that might include soils that have the potential to be classified as a hazardous waste. The lead agency is reminded that, if soil is contaminated by hydrocarbon contaminants, contaminated sites would be subject to AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and that compliance should be referenced in the Final EIR.