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E-Mailed: JANUARY 20, 2012 January 20, 2012
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Review of the Draft Environmental Impact Report (Draft EIR)/Application Summary Report for the Proposed Total Terminals International (TTI) Grain Export Terminal Installation Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-captioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes to build a grain transloading facility on a 10-acre parcel on Pier T at the West Basin of the Long Beach Harbor. The proposed project would enable the transfer of up to 2.2 million tons per year of grain and cattle feed throughput from outside the basin using existing rail and shipping infrastructure during a 50 week annual period. New rail unit trains with a maximum of 110 car units (11,000 tons per train unit) would bring these materials from the Midwest to the Watson Rail Yard located three miles north of the proposed project site. From the rail yard, the grain/cattle feed would be taken by rail to the proposed Grain Transloading Facility. The rail cars would then be unloaded at the project site, loaded by conveyor into empty cargo containers, and then taken to the crane loading area by diesel fueled hostlers (yard tractors) at the TTI Container Yard approximately one half mile north for ocean vessel shipment to an overseas market. Empty rail cars would then depart from the project site on new outbound unit trains from the Watson Rail Yard. From there, the empty container units would be returned to the Midwest as part of a new outbound train. The lead agency's air quality and health effect analyses were based upon train operations that include the following assumptions: two new train units per day (one train into the SCAB and one train out of SCAB) with four locomotives per train; four trains total per week (two inbound and two outbound); resulting in emissions from a total of 200 new unit trains per year.

The major components of the proposed facility include a Rail Unloading and Product Receiving Building; Covered Storage facilities; Covered Container Loading Facilities; Rail Unloading Operations; Container Unloading Operations; and Container Handling Operations. Construction would include grading of the entire 10-acre site; Cement Deep Soil Mixing (CDSM) activities to strengthen the site foundation areas; disposal of excess CDSM slurry; and disposal of up to 23,700 cubic yards of excavated soil to accommodate the new rail and building facility foundations. Construction would occur in five phases with some overlapping phases beginning in June 2012 lasting approximately 14 months.

Based on the air quality analysis, the proposed project air quality impacts will exceed the recommended daily thresholds of significance for NOx, mostly from the new train units' locomotive emissions but also including emissions from the yard tractors operating at the site. The AQMD staff is concerned that the Draft EIR did not calculate emissions from yard tractors operating at the proposed Grain Transloading Facility from their movement from the proposed project site to the TTI Terminal and back. The AQMD staff is also concerned that all feasible mitigation measures during construction and operations including zero emission technologies, have not been considered. Finally, the AQMD staff requests that the method for controlling particulate matter emissions from permitted equipment that loads grain/feed into cargo containers and other dock equipment be clarified. Details follow in the attachment.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD staff 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 Ian MacMillan, Program Supervisor CEQA Intergovernmental Review, at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,

Ian MacMillan
Program Supervisor
CEQA Intergovernmental Review

IM:GM
Attachment

LAC111208-01
Control Number

Cargo Handling Equipment

1. In its operational emissions estimates for off-road equipment, the lead agency has assumed that the diesel-fueled yard tractors (hostlers) used for moving containers about the project site would not increase from their existing uses. Unlike the vessel emissions that will remain part of the baseline, the proposed project will cause the hostler equipment to operate over the full length of the site from the grain loading area to the area where cranes will load the filled containers onto ocean vessels. Therefore, these added emissions from the extended length of operation should be added to the air quality analysis in the Final EIR.
2. The proposed project requires the use of diesel cargo handling equipment (side-picks, top-picks, and hostlers) on-dock to move containers. The lead agency has not provided an analysis of the potential for zero emission technologies to transport containers onsite. The regular movement of containers on a single parcel presents a potential opportunity to implement a zero emission technology from project startup. Zero-emission yard hostlers, for example, are being demonstrated in port applications and, like the zero-emission trucks described in the attachment to this letter (and for the same reasons), are feasible for implementation within a short number of years in the life of the project. In addition, as this would be a brand new facility with significant air quality impacts, the lead agency must take the opportunity now to build the necessary infrastructure (e.g., electric charging for electric yard hostlers) that will enable the least use of diesel technologies possible. Waiting to install on-dock zero emission technology at some future unspecified date will impact air quality in the interim, and it may make implementing this technology even more difficult as new infrastructure may interrupt operations at a working terminal. Although regional NOx impacts from this project are dominantly from locomotives, opportunities to reduce NOx from any source should be considered to reduce this impact to a less than significant level

Permitting

3. Based on the project description, AQMD permits may be required during the grain and feed loading operations into cargo containers. Although conveyors would be used to load the grain and feed into containers, control measures to reduce particulate matter (PM) as it drops from the conveyor into the container have not been specified. PM emissions therefore appear to be uncontrolled during this part of the loading operation. The lead agency should also specify if the project site is contiguous with the existing Hanjin Terminal. If so, then the project emissions would be added to the existing NSR account. Permit questions can be directed to AQMD staff at (909) 396-2591.

Soil Remediation During Construction

4. In the project description, excavation activities will be performed during construction of the Rail Unloading, Product Receiving, and Storage Facilities. Since there is ongoing remediation occurring on other portions of the 70-acre Installation Restoration (IR) Site 4, on which the proposed 10-acre project is also located, it is unclear if the proposed soil disturbance activities will disturb soil that has the potential to be classified as a hazardous waste, (e.g., petroleum hydrocarbons, etc.).

Should potential excavation activities disturb soil that would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, the lead agency should reference compliance with Rule 1166 in the Final EIR.

Construction Mitigation Measures

5. In the air quality analysis, the lead agency has determined that construction air quality impacts exceed the AQMD recommended thresholds of significance during the projected 14-month construction period (June 2012 to August 2013). The AQMD staff therefore recommends the following additions to the mitigation measures for consideration in addition to the mitigation measures listed starting on page 3.1-17 in the Air Quality Section of the Draft EIR, if applicable and feasible:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). If the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements,
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:

  - ✓ January 1, 2012, to December 31, 2014: All off road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
  - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Prohibit truck idling in excess of five minutes;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered; and

- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .