



South Coast Air Quality Management District

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September 6, 2013

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City of Santa Fe Springs
11710 Telegraph Road
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Universal Waste Systems Material Recovery Facility (MRF) and Transfer Station (TS)

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration.

The lead agency proposes to relocate the existing storage and maintenance yard to another site. In its place, three of the four existing buildings would be modified but a fourth existing building would be demolished. The lead agency would then construct a new MRF and TS with a permitted capacity of 2,500 tons per day (TPD). The project estimates that 1,178 daily trips would be generated for operations that would occur between 6:00 AM to 10:00 PM, Monday through Saturday. The facility would accept the following waste materials: solid municipal waste (SMW), green waste, and construction and demolition debris (C&D). Approximately 48 people would be employed per shift. Project construction and operations would both occur in 2014.

The Draft CEQA document does not include sufficient detail to demonstrate that regional air quality and health effect impacts for project operations are less than significant. The modeling results for operational emissions unexpectedly seem low. In addition, the points of origin for the trucks operating at the site and their operating areas were not identified to document the trip lengths used to estimate operational air quality and ultimately health effect impacts. The SCAQMD staff further recommends that project operational health risk effects be estimated and included in the Final MND. If regional or health effect impacts are determined to be significant, additional mitigation should be included in the Final CEQA document to reduce impacts to below significance levels. Further details follow in the attachment.

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Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be available to work with the Lead Agency to address these issues 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

Attachment

IM:CT:AK:GM

LAC130807-01
Control Number

Air Quality Analysis

Operations

Operational Emission Estimates

1. In Table 3-3, the regional operational air quality estimates are very low considering the numbers of proposed trucks and vehicles estimated to operate at the site. Although the lead agency cites the use of the California Emissions Estimator Model (CalEEMod) in the table footnotes, the modeling input assumptions and the output sheets were not included in the Draft MND. The SCAQMD staff recommends that this documentation be included in the Final MND. In addition, the analysis should include vehicle idling emissions from vehicles entering, off-loading and exiting the site. Without supporting details, it appears that the proposed project's operating emissions could be substantially underestimated resulting in significant impacts that would also affect other analyses including localized operational air quality impacts and the health effect analysis.

Breakdown of Mobile Source Emissions

2. The lead agency has estimated on-site equipment emissions for project stationary and equipment sources shown in Table 3-3 on page 50 of the Draft MND. For clarification, Table 3-3 should be revised in the Final MND with more detail to clarify each mobile emission source category and the respective emissions, i.e. report the emissions from the self-haul customers, vendors, collection trucks (CNG fueled and Non-CNG fueled trucks), commodities trucks, transfer trucks and employee vehicles.

Vehicle Trips

3. The daily trips reported in the Traffic Estimates Table in Appendix A and the number of daily trips described in the narration on page 50 of the Draft MND are not consistent, i.e., Appendix A shows 81 self-haul trips; 303 collection trucks trips; 96 employee vehicle; 27 commodities trucks; and 82 transfer trucks (1,178 total trips) but the narration on page 50 shows 80 daily truck trips (not broken down by commodities and transfer truck categories); 60 employee trips for 30 employees (48 employees are listed on page 37 under facility employment); and 30 vendor trips are listed. In addition, the collection truck trips are not numbered in the page 50 narration. If the 303 collection truck figure listed in Table A is included with the totals on page 50 (473 total daily trips), the total number of daily vehicle trips is not equal (Appendix A – 1,178 daily trips; Page 50 narration – 473 daily trips). Further, only 173 trips per day were analyzed in the CalEEMod run to determine air quality impacts. In the Final MND, the lead agency should reconcile the numbers of all truck category trips, employee vehicles and other vehicle trips to be consistent and provide documentation to substantiate the final numbers. Applicable analyses in the Final MND should also be revised as needed.

Vehicle Trip Lengths

4. Currently, the California Emissions Estimator Model (CalEEMod) shows a trip length of 7.30 miles for trucks operating at the facility. If documented, this might be satisfactory for local collection truck contractors but too low an estimate for other collection trucks from outside of the immediate area and some self-haul vehicles. The air quality documentation should also include a conservative estimate of vehicle miles traveled for the commodities trucks sending recycled products to their business customer locations and locations of potential area landfills or other facilities where transfer trucks will carry waste and residual solid waste as planned by the project applicant. Finally, the air quality documentation in the Final MND should also include the point of origins, destinations, methodologies, emission factors, and equations used to estimate these mobile source impacts. These can be included as a table footnote, in the narration or as an appendix. Otherwise, the lead agency has not demonstrated that operational impacts are less than significant.

SCAQMD Permitting Responsibilities

5. On page 35 of the Draft MND, Building B will be remodeled to include bale storage and a food waste dehydration operation. Portions of these operations may be applicable to SCAQMD rules and regulations requiring permits, which the SCAQMD would then review in its role as a responsible agency in addition to providing input as a commenting agency. Applicable SCAQMD rules and regulations include but are not limited to Rule 219 (Equipment Not Requiring a Written Permit Pursuant to Regulation II) for general applicability; Rule 1146 (Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters) for a boiler; and Rule 1147 (NO_x Reductions from Miscellaneous Sources) for a heater. Since specific technical information was not supplied in the Draft MND for this equipment that may need permits, e.g., the specifications of the dehydration heater and the evaporator element, the type of energy used for each piece of equipment (electricity, natural gas, etc.), emission estimates, equations, emission factors, methodologies, etc., the lead agency should include this information in the Final MND. Questions concerning equipment permit requirements can be directed to Engineering and Compliance staff at (909) 396-2684.

Localized Significance Thresholds Analysis Not Included in Draft MND

6. In a memorandum dated August 29, 2013 sent by the consultant to the SCAQMD staff after the Draft MND was circulated for public comment, the results of a localized significance thresholds (LST) analysis were submitted to the SCAQMD staff for review. Based on the memorandum, on-site localized impacts were estimated for construction and operations. These estimates were made using the SCAQMD LST screening tables but were not included in the Draft MND. These results and analysis for localized construction and operational impacts should be included in the Final MND for review by the public, reviewing agencies and other interested parties.

Health Risk Effects Assessment

7. In the project description, the lead agency estimates 1,178 daily project trips including diesel fueled commodities and transfer trucks. The particulate portion of diesel exhaust emissions from these diesel fueled vehicles has been classified by the California Air Resources Board as carcinogenic. If the proposed project includes a substantial increase in the number of heavy-duty diesel truck trips operating from the project site and traveling past sensitive receptors including residences and schools (Los Nietos Middle School and Pioneer High School), an air toxics health risk analysis may be warranted and should be included in the Final MND. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.¹ Should the lead agency determine that the proposed project expansion will have significant health effect impacts, additional mitigation would be warranted.

Heavy Duty Diesel Collection and Transfer Vehicles

8. The proposed project will use heavy duty trucks to transfer waste from the proposed MRF and TS 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 requires 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.).²

¹ This document can be downloaded from the AQMD's CEQA web pages at the following URL:
http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc .

² <http://www.aqmd.gov/tao/Implementation/index.htm> and
http://www.arb.ca.gov/msprog/truckstop/azregs/fa_resources.php