



# South Coast Air Quality Management District

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November 14, 2014

Mr. John Carver, Assistant Director  
Community Development Department  
City of Paramount  
5050 North Irwindale Avenue  
Irwindale, CA 91706

**Draft Environmental Impact Report (DEIR) for the Proposed Conditional Use Permit (CUP) 721, Royal Recycling and Transfer Facility at 14001 Garfield Avenue in Paramount (SCH NO. 2013121025)**

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

Based on the project description, the proposed Materials Recovery Facility and Transfer Station (MRF/TS) project will receive, process, and transfer municipal solid waste and curb-side recyclables from the current 570 tons per day (tpd) up to a maximum permitted capacity of 2,450 tpd on the 7.32 acre site. The current recycling facility handles an approximate total of 570 tpd: 488 tpd from waste collection trucks and 82 tpd from self-haul customers, as well as transfer truck activities. Based on the proposed four-fold plus increase in waste and recyclables throughput, the Lead Agency estimates that traffic from all sources would increase from 1,119 daily trips to approximately 1,870 total daily trips, including approximately 1,731 daily truck trips. Waste that cannot be recycled will be loaded onto transfer trucks for disposal at area landfills and recovered recyclable materials (metals, plastic, cardboard, etc.) will be prepared for transfer by trucks to businesses that will use recycled products. The facility plans to have approximately 151 total full time employees scheduled in three separate shifts and will operate 24 hours per day, 7-days a week, 365 days a year. Construction will begin in 2015 and take approximately nine months to complete with operations beginning later in the year or in early 2016.

The SCAQMD has concerns that the DEIR does not include baseline estimates for existing health effect impacts or for existing operational emissions that could be compared with the proposed Project air quality impacts in the DEIR. Since the proposed Project would increase the waste and recyclable throughput at least fourfold and the Lead Agency is using baseline conditions as the basis for not requiring a Health Risk Assessment (HRA), the potential changes from the baseline to the projected increases in health effect and air quality impacts should therefore be quantified in the Final EIR.

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(FEIR). There are other concerns concerning the lack of documentation to explain basic assumptions included in the air quality and traffic analyses. Finally, the SCAQMD staff is concerned that all feasible mitigation be included in the FEIR should significant Project air quality or health effect impacts occur after further evaluation based on SCAQMD staff comments.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is 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,

*Jillian Baker*

Jillian Baker, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

JB:GM

LAC1401003-02  
Control Number

### **Health Risk Assessment**

1. In the Traffic Impact Analysis, the proposed MRF/TS will include an estimated 1,731 daily truck trips (excluding vehicle activity removed the existing non-MRF/TS activities and the undetermined number of CNG fueled waste collection trucks), which are 87 percent of the Project's projected total daily trips (the existing truck activity was estimated at 31 percent truck activity). This would be an estimated 56 percent increase in truck activity at the project site (existing to proposed project truck activity). Many of the proposed Project waste collection trucks, transfers trucks, commodity trucks, etc., will likely use diesel fuel, which has been determined to be carcinogenic (something that causes cancer) by the California Air Resources Board (CARB). Further, the proposed project site is located approximately 200 feet south of single-family residences; approximately 325 feet east of a mobile home park; and less than one-quarter mile (1,150 feet) north of Howard Tanner Elementary School. Finally, the truck routes shown in the DEIR<sup>1</sup> show sensitive receptors along routes proposed for project truck operations including single- and multifamily residences (along Garfield Avenue, Rosecrans Avenue, Paramount Boulevard, and Alondra Avenue), and schools (Howard Tanner Elementary along Rosecrans Avenue and Dominguez High School along Alondra Boulevard).

The DEIR did not include a HRA to analyze the health impacts from the increased project truck trips and activities on-site to nearby sensitive receptors. The reason a health risk analysis was not conducted was that the majority of the proposed truck traffic would include waste collection trucks that run on CNG. The increased truck trips from diesel-fueled transfer trucks would only be replacing the truck traffic from the existing Royal Truck Body Business.<sup>2</sup> Although the proposed truck activities might replace the existing truck activities, this should be demonstrated in the FEIR by conducting a HRA to support these conclusions.

In the DEIR, the Lead Agency did not include a baseline of the existing health risk impacts from existing truck traffic to existing sensitive receptors affected by existing MRF/TS operations. The FEIR should therefore include a baseline risk analysis that can be compared to the project's resulting health risk that will estimate the increase in exposure to sensitive receptors from the proposed change or increased exposure to diesel particulate matter from the proposed increase in activities on- and off-site during truck operations (e.g., trucks coming into the site, idling, leaving the site, etc.). The estimated risk impacts should then be compared with recognized thresholds of significance to determine if the proposed project health effect impacts are less than significant.

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<sup>1</sup> DEIR, Section 3.9, Transportation & Circulation Impacts, Exhibit 3-10, 3-11, 3-12, 3-13, 3-14, 3-15, and others.

<sup>2</sup> E-mail correspondence dated November 15, 2014 from M. Blodgett, Principal, Blodgett Bayliss Environmental Planning.

## **Air Quality Analyses**

### **Baseline Operational Emission Impacts**

2. In the DEIR, the Lead Agency did not include a baseline for operational emissions for the existing operations including truck traffic at the by existing MRF/TS operations. The FEIR should therefore include this baseline for long-term emissions that can be compared with the projected operational emission impacts estimated in the air quality analysis. The changes between the baseline emission estimates and the projected Project emissions should then be compared with recognized thresholds of significance to determine if the proposed changes in project air quality impacts for operations are less than significant.

### **Existing and Projected Vehicle Trips and Distances During Operations**

3. Based on the projected 1,880 tpd increase in waste and recyclable throughput materials (570 tpd to 2,450 tpd), some basic documentation for the existing and projected operational activities is not included in the DEIR. This supporting information should be incorporated into applicable analyses (air quality, health risk assessment, traffic, etc.) in the FEIR to support the Lead Agency's findings to substantiate the Lead Agency's CEQA determinations. Otherwise, the operational air quality impacts could be substantially underestimated. Without documenting the different vehicle categories, fuel types, vehicle trips, vehicle miles traveled and fleet mixture percentages demonstrating the vehicle miles traveled assumptions in the air quality analysis, the Lead Agency has not provided substantial evidence to support its determination that operational impacts are less than significant.

### **Vehicle Trips/Emissions by Vehicle Category and Fuel Type**

- a. The FEIR should separate vehicle operational emission activities (daily vehicle trips and emission estimates) by vehicle and fuel type for both existing and projected vehicle activities. In general, the FEIR and applicable air quality analysis should also include an estimate of how many trucks by category (waste collection, transfer, commodity trucks, etc.) are owned and operated by Calmet Services, Inc., independent waste haul operators, municipal agencies, etc. For example, the Lead Agency states in the air quality analysis that all waste collection trucks are under contract or otherwise controlled by Calmet Services, Inc. are fueled by compressed natural gas (CNG).<sup>3</sup> Although not expressly stated in the DEIR, it assumed that all other project vehicles (i.e., waste collection trucks, self-haul trucks, commodity and transfer trucks) used by non-Calmet Services, Inc. are diesel fueled. The vehicle by fuel breakdown should be clarified in the FEIR.

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<sup>3</sup>DEIR, Air Quality Impacts, Page 63.

### **VMT From Higher Throughput & Disposal/Recycling Destinations**

- b. The vehicle miles traveled (VMT) distances used during operations in the CalEEMod air quality land use model should be documented in the FEIR. Based on the proposed increased throughput, the existing and projected truck service areas for collection waste, expected expanded demand distances from people using self-haul vehicles bringing waste and recyclables should be described to support the VMT used in the CalEEMod land use modeling analysis.

The FEIR should also include information to support the VMT for existing and projected residual waste disposal locations (distances of the existing landfill site locations for transfer truck activities). In addition, the range and distances of existing recycled commodities business locations and any projected increase in mileage (if the disposal location range will expand for the recycled commodities trucks) should also be included in the FEIR.

Otherwise, the operational air quality impacts could be substantially underestimated. Without demonstrating the vehicle miles traveled assumptions in the air quality analysis, the Lead Agency has not provided substantial evidence to support its determination that operational impacts are less than significant.

### **Truck Fleet Mixture Percentages**

4. The truck fleet percentages presented in Table E in the Traffic Impact Analysis are substantially higher than the Fleet Percentage Mixture shown as inputs to the CalEEMod land use model for operations. As a reference, the Existing Trip Generation shown in the Traffic Impact Analysis for waste collection trucks; transfer trucks; and commodity trucks total 31 percent<sup>4</sup> of the existing site's total daily trips (CNG fueled waste collection trucks are not broken out in Table E) but the proposed project in the Traffic Impact Analysis shows that 87 percent of total daily trips are estimated to be truck trips<sup>5</sup>. The CalEEMod modeling, however, uses only 9 percent as fleet mixture percentage to estimate operational emissions from project trucks with the modeling output sheets showing vehicle fleet percentages, as follows: Light Heavy Duty Truck, 2 – Axle Vehicles (LHD1) 4.1566 percent; Light Heavy Duty Truck, 2 – Axle Vehicles (LHD2) 0.6616 percent; Medium Heavy Duty Truck, 3 – Axle Vehicles (LHD2) 1.5092 percent; and Heavy-Heavy Duty Trucks – 4 + Axle Vehicles (HHDT) 2.7587 percent. This totals a 9.086 percent truck fleet-mixture percentage resulting in almost 91 percent of remaining vehicles visiting the site being non-trucks.

In the Final EIR, the fleet mixture percentages are different in the air quality modeling and the trip generation estimates in the Traffic Impact Analysis. In the CalEEMod modeling, the modeling output sheets show less than 10 percent trucks

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<sup>4</sup>Traffic Impact Analysis (Arch Beach Consulting, June 2014), Table E – Project Trip Generation Estimates: 344 Collection, Transfer and Commodity Trucks divided by 1,995 Total Daily Trips (344 divided by 1,995 = 31 percent).

<sup>5</sup>Ibid, Table E: 1,731 Proposed Royal MRF Daily Trips (Transfer and Commodity Trucks Only) without any Cal-Met, Non-Calmet or Other CNG Collection Vehicle included divided by 1,995 New Traffic From Proposed Project (1,731 divided by 1,995 = 87 percent).

but the project trip generation in the Traffic Impact Analysis estimates 87 percent trucks. Since an unknown percentage of waste collection trucks visiting the site use CNG, the methodology assumptions used to determine the truck percentages in the CalEEMod estimates should also be included in the Final EIR. Lastly, the assumptions should be consistent throughout the Final EIR and related analyses. Otherwise, the Lead Agency has not demonstrated its determination that that project operational impacts are less than significant.

### **Other**

5. Based on the project trip generation estimates in the Traffic Impact Analysis, the existing staff and visitor daily trips would decrease while the waste throughput would increase (613 daily trips to 264). The Final EIR should clarify the projected decrease in this traffic activity.
6. In Table E in the Traffic Impact Analysis, 125 daily trips were subtracted from the New Traffic From Proposed Project total of 1,995 total daily trips resulting in 1,870 Total Net Daily Trips. It is not clear what types of vehicles make up the 125 daily trips. Therefore, the net daily trips should be broken down in the Final EIR by vehicle category: staff and visitor vehicles; self-haul, waste collection; transfer; and commodity trucks, and in each applicable analysis.

### **Receiving Waste Material Containing Asbestos**

7. The Lead Agency should be aware that, as a facility accepting construction and demolition (C & D) material, the facility must be in compliance with Federal Regulations Subpart M, NESHAP – National Emission Standard for Asbestos in order to accept any asbestos containing waste material. Additionally, compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities should be cited in the FEIR.

### **Operation Mitigation Measures**

8. Further analyses by the Lead Agency based on SCAQMD staff comments in this letter may result in higher emission estimates and health effect impacts. In the event the Lead Agency's revised estimates determine that project regional, localized or health effect impacts will exceed or further exceed recommended significance thresholds (mostly attributed to mobile source tailpipe emissions from vehicles operating at the proposed facility), the SCAQMD staff encourages the Lead Agency to develop a common set of enforceable mitigation measures to reduce those emissions to the maximum extent feasible. As the Lead Agency is aware, heavy-duty trucks are the largest source of NOx emissions in our basin and NOx emissions must be reduced by approximately two thirds beyond existing rules and regulations in order to meet air quality standards as required by 2023. Without meeting air quality standards, our region faces federally mandated sanctions, including possible loss of transportation funding. The SCAQMD staff recommends the following changes and

additional measures in addition to the measures listed starting on page 67 of the DEIR to further reduce significant air quality impacts:

Recommended additional measures:

- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- At project start, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
- The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets the quantities and emission standards listed in the RDEIR. This log should be available for inspection by city staff at any time.
- The facility operator will ensure that onsite staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB approved courses (such as the free, one-day Course #512)].
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.
- Have truck routes clearly marked with trailblazer signs so trucks will stay on truck routes established by the Lead Agency and not enter residential areas.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1 (recommend sweepers using reclaimed water).
- Install solar panels on all available roof space. If this isn't feasible, then at a minimum all buildings and electrical infrastructure should be designed to accommodate potential future solar panel upgrades.

#### **Alternative Fueled Truck Phase-In Schedule**

9. Because the proposed project is estimated to generate significant regional emissions, the Lead Agency should require further mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the FEIR, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and

upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

At a minimum, require trucks that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the facility should also be required to accept and use them.

### **Electric Vehicle (EV) Charging Stations**

10. If project operational NO<sub>x</sub> impacts are significant, the SCAQMD staff recommends the Lead Agency require the proposed facility and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in since trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NO<sub>x</sub> impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available since the cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.<sup>6</sup> Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

### **CNG Fueling Station**

11. In the Air Quality Impacts Section, the Lead Agency states that the Calmet Services, Inc., controlled waste collection trucks will be fueled by CNG but it is not clear if the proposed project site will include a CNG fueling station or if one is located nearby. Should the Lead Agency determine, after further analysis, that the proposed project will generate significant regional NO<sub>x</sub> operational impacts, the SCAQMD staff recommends that the project pro-actively take measures that could reduce emissions sooner rather than later. The SCAQMD staff therefore recommends that the Lead Agency ensure the availability of alternative fueling facility (e.g., natural gas) to serve the project site prior to operation of any large truck operation uses within the project area.

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<sup>6</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)