



South Coast Air Quality Management District

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County of Los Angeles, Department of Public Health
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Recycled City Solid Waste Facility Permit Revision Project

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 (Final MND).

In the project description, the Lead Agency proposes to revise an existing Solid Waste Facility Permit (SWFP) to add municipal solid waste (MSW) processing at the site. The permit currently allows processing of 3,000 tons per day of (TPD) of construction, demolition, and inert (CDI) materials, including green materials. The proposed change still limits processing to 3,000 TPD but will now include MSW along with the CDI and green materials. The proposed project will include construction of a new building and excavation for a sub-surface loadout tunnel on the approximately 7-acre portion of the larger Recycle City Specific Plan permitted area site. All current and proposed waste operations will remain the same including 24 hour daily operations. The SCAQMD staff comments are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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.

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Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment

JW:CT:JC:GM

LAC161021-06
Control Number

Air Quality Analysis

1. In Appendix A: California Emissions Estimator Model (CalEEMod) Output, the Lead Agency includes on-site grinding operation¹ emission estimates. In the Final MND, the SCAQMD should be included as a responsible agency and the estimated emissions from grinding operations should be included in the Final MND for regional, localized estimates but also as a separate permit source category for permit review purposes (see Comment #8). Those grinding operation emissions in the Draft MND should agree with the emissions shown in the permit application submitted to the SCAQMD. Permit questions regarding the grinding operations should be directed to Engineering & Permitting staff at (909) 396-2684.
2. On Table 1. Project Construction Emissions, the Lead Agency refers to CalEEMod output sheets but only annual output sheets are included in Appendix A of the Air Quality Impact Analysis. In order to demonstrate the Lead Agency's determination for construction emissions shown in Table 1, the Final MND should include the CalEEMod output sheets that show construction emissions in pounds per day.
3. Table 2: Existing and Projected Operational Emissions on page 18 emissions are presented in tons per year. Since the SCAQMD significance thresholds are based on pounds per day in order to show the peak or worst-case impact, the Final MND should also include these emission estimates in pounds per day. By showing the emissions in tons per year, the average annual emissions could be lower than a peak day's impacts. The daily peak estimates should then be compared with the respective pounds per day emission threshold to determine if a significant impact(s) exists.

Health Risk Assessment

4. The Lead Agency evaluated health risks in the Draft MND according to the San Joaquin Air Pollution Control District (SJVAPCD) modeling guidance and parameters. Since the proposed project is located in the South Coast Air Basin, SCAQMD staff recommends the Lead Agency revise the dispersion modeling and health risk assessment (HRA) using SCAQMD's mobile source health risk assessment guidance² and AERMOD (current version 15181)³.

¹Grinding operations include green waste and construction, demolition and inert materials.

² *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis:*

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

³ The American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee (AERMIC) was formed to introduce state-of-the-art modeling concepts into the EPA's air quality models. Through AERMIC, a modeling system, AERMOD, was introduced that incorporated air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. As of December 9, 2006, AERMOD is fully promulgated as a replacement to ISC3, in accordance with Appendix W (http://www.epa.gov/ttn/scram/dispersion_prefrec.htm). AERMOD is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain.

5. The Lead Agency used SCREEN3 (version 96043) to conduct a screening level health risk assessment and stated that the assessment is conservative. However, a screening level assessment is inappropriate here and likely not conservative due to the modeling complexity of the proposed project (idling during loading and unloading, on-site travel, and truck routes) and the location of sensitive receptors. SCREEN3 is intended for a single emission source and not for multiple emission sources. The proposed project has several non-uniform emissions throughout the site that should not be generalized as a single volume source. SCAQMD staff recommends using AERMOD to properly model individual emission sources, discrete receptor locations, wind data, and terrain data.

SCAQMD Rule Requirements

Rule 410

6. The SCAQMD Engineering & Permitting staff views the proposed change to the solid waste permit as triggering the “modified facility” requirements of SCAQMD Rule 410 - Odors from Transfer Stations and Material Recovery Facilities and would be effective at the time of issuance of the revised solid waste permit. As such, the proposed enclosure shall meet the design and ventilation requirements of Rule 410. Based on the Engineering & Permitting staff review, the Draft MND did not include sufficient information in the documents provided to determine whether the enclosure meets the Rule 410 requirements. Therefore, the Final MND should include information regarding compliance with SCAQMD Rule 410.

Rule 1166 and Rule 1150

7. Regarding the construction of the subsurface tunnel, any excavation of soils⁴ suspected to contain volatile organic compounds (VOC’s) or buried refuse shall be conducted with a valid plan based on SCAQMD Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil or SCAQMD Rule 1150 - Excavation of Landfill Sites.⁵ Therefore, the Final MND should include information regarding compliance with SCAQMD Rules 1166 and 1150.

Permit Requirement for Grinding Operations

8. The on-site grinding operations will require a permit from the SCAQMD and the SCAQMD should therefore be identified in the Final MND as a responsible agency for permitting purposes. It should also be noted that a statewide registered portable grinder would not be considered having a valid permit since the portable registrations are not intended for use at a stationary source. In addition, the SCAQMD staff would encourage the use of an electrically powered grinder, unless the grinder can legitimately be used at more than one location on the premises. In this case a diesel

⁴ Draft MND, Page 9, Under Construction.

⁵ SCAQMD Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil or SCAQMD Rule 1150 - Excavation of Landfill Sites

engine that meets the strictest standard is recommended. For dust mitigation, the facility will require direct application of water onto the material being ground.

Odor Mitigation

9. Although the facility surroundings are primarily commercial, there is the possibility that receptors will change over the life of the project. As the handling of MSW will increase the potential for fugitive odor emissions compared to the existing facility, SCAQMD staff suggests consideration and implementation of odor mitigations in case there is a need for them. These mitigation measures are taken from projects that were located nearer to sensitive receptors and were the source of odor complaints:
 - No chipping or grinding of green materials allowed on-site;
 - Constraints on the holding time of putrescible portions of MSW and green materials;
 - Use of screens/nets/trees along property boundary;
 - Prohibitions of MSW “hot” and odiferous loads;
 - Paved surface cleaning shall be conducted at a frequency sufficient to minimize track-out and particulate re-entrainment;
 - All unloading, sorting, storage, and loading of MSW and green material waste shall be conducted in a fully-enclosed structure equipped with filtration and treatment equipment;
 - The door and ventilation openings of the structure shall remain closed when not in use and be the minimum necessary for safe movement of vehicles and adequate ventilation;
 - The door and ventilation openings of the structure be equipped with a comprehensive water fog/mist sprayer system designed to minimize fugitive dust and with the possible addition of odor oxidizing and/or neutralizing chemicals provided that the chemicals do not by themselves cause or aggravate a nuisance. To this end, odor masking and fragrant additives in the chemicals should be avoided.

Project Trip Generation

10. Based on the Transportation/Traffic Section in the Draft MND,^{6 7} the proposed project will result in fewer daily trips but does not describe the projected trips generated by vehicle type (e.g., passenger vehicles, private owner operated trucks, waste collection trucks⁸, transfer trucks, etc.) or the type of fuel used (e.g., gasoline, compressed natural gas, diesel, etc.). This information is needed to support the Lead Agency's project emissions and health risk estimates from the proposed changes in the fleet mixture based on the facility plan to receive MSW. Although the potential changes would include an approximately total of 460 waste collection trucks and other vehicles dropping off at the facility, the number of transfer trucks would also increase. The fleet mix needs to account for the existing vehicle types compared with the proposed project's fleet mix that are assumed in the operational air quality emission estimates. The Final MND should be updated to include this information to support the Lead Agency's air quality and health risk determinations.
11. The Final MND should include the proposed routes for the waste collection and transfer trucks coming into and leaving the site. The estimated points of origin for the waste collection trucks and potential disposal sites that the transfer trucks will be driving to should also be included in the Final MND.

On-Site Operational Mitigation Measures

12. In the event that the Lead Agency determines that emissions converted from tons per year to pounds per day (see Comment #3) exceed the SCAQMD recommended daily significance thresholds in pounds per day, the SCAQMD staff recommends the following mitigation measures to reduce impacts below significance levels:
 - Limit the daily number of trucks allowed at each facility to levels analyzed in the Final MND. 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.
 - Use alternate fueled on-site equipment (e.g., LPG - Propane, CNG – Methane, electric powered, etc.).
 - Prohibit all vehicles from idling in excess of five minutes, both on-site and off-site.
 - 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.

⁶ KOA Corporation Technical Memorandum dated April 6, 2016. Review of Planned Operations – Interior Removal Specialist, Inc., at Rayo Avenue, South Gate. Also cites KOA Corp., November 2006.

⁷ KOA Corp., Traffic Impact Study for a Facility Expansion at 9309 Rayo Avenue, South Gate (January 2007).

⁸ DRAFT MND, Page 8, 460 daily collection trucks are estimated.

- 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 DRAFT MND. This log should be available for inspection by Lead Agency 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.
- 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).