



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: December 3, 2013
jcarver@paramountcity.com

December 3, 2013

Mr. John Carver
Community Development Department
16400 Colorado Avenue
Paramount, CA 92335

Review of the Draft Negative Declaration (Draft ND) for the Proposed CUP No. 761 (1,000 gallon above ground diesel tank) Project

The South Coast Air Quality Management District (SCAQMD) staff 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 document as appropriate.

The SCAQMD staff is concerned that the above mentioned Draft Negative Declaration (Draft ND) prepared by the Lead Agency does not adequately describe the proposed project nor demonstrate that the project will have less than significant air quality impacts. Based on a discussion with planning staff at the City of Paramount, the SCAQMD staff learned that the proposed project could result in indirect air quality impacts from the use of diesel forklifts which was not discussed in the project description. Specifically, the Draft ND does not provide a comprehensive project description that includes the existing and future operational activity levels for the on-site equipment (e.g., diesel powered forklifts) related to the proposed project. Further, the Draft ND does not contain a quantitative air quality analysis and did not quantify localized toxic and criteria pollutant impacts, regional criteria pollutant impacts, and greenhouse gas (GHG) impacts in the Draft ND. Absent a quantitative air quality analysis, the Draft ND does not substantiate the Lead Agency's determination that the project will result in less than significant air quality impacts. Therefore, the SCAQMD staff recommends that the Lead Agency revise the Draft ND to incorporate a more robust project description and a quantitative air quality analysis that substantiates the Lead Agency's significance determination. In the event that the revised air quality analysis demonstrates that the project will result in significant air quality impacts SCAQMD staff recommends that the Lead Agency include air quality mitigation measures pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) guidelines.

Further, SCAQMD staff notes that on November 22, 2013 the SCAQMD staff submitted an e-mail to the project applicant and the Lead Agency reflecting the comments above.

The SCAQMD staff specifically requested details regarding the project description and additional information pertaining to potential air quality impacts. The content of the e-mail is in the enclosed comments and a copy of the e-mail has been provided in Exhibit A. The SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final environmental document. Also, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

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

Attachment

IM:DG

LAC131115-02
Control Number

Project Description:

1. Based on the project description and a discussion with planning staff at the City of Paramount¹ (Lead Agency) it appears that the proposed project includes the installation of an above-ground 1,000 gallon diesel fuel storage tank. The project is intended to facilitate on-site refueling of 10 new diesel fueled forklifts. Based on information in the Draft ND, these new diesel fueled forklifts are part of an effort to replace the facility's existing forklift fleet and comply with state requirements. Specifically, the facility will replace an existing fleet of 40 propane fueled forklifts with a fleet of 29 forklifts consisting of 10 diesel fueled forklifts and 19 propane-fueled/propane powered forklifts. However, the Draft ND does not provide an explicit description of the existing fleet (i.e., baseline) or new replacement fleet (future project) nor does the Draft ND describe the construction/installation and operational requirements for the diesel fueled tank. As a result, SCAQMD staff cannot determine the emissions impacts from the proposed project. Therefore, air quality impacts and greenhouse gas emissions from both construction (including demolition, if any) and operations should be calculated in the final CEQA document².

Construction Emissions -Diesel Fuel Storage Tank Installation

2. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of equipment for grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., construction equipment such as cranes and front loaders, etc.) and on-road mobile sources (e.g., heavy duty truck(s) for fuel tank delivery, construction worker vehicle trips, material transport trips, etc). All emissions from construction activities required for the proposed project should be calculated and compared to the SCAQMD's CEQA regional and localized significance thresholds.

Operational Emissions-Direct and Indirect Emissions Sources

3. As mentioned in Comment #1 above the Draft ND did not quantify the project's potential operational air quality impacts. Therefore, the final CEQA document should quantify the direct and indirect operational emissions (combined) from operational activities pertaining to the proposed project and compare the result to the SCAQMD's CEQA regional and localized operational emissions significance thresholds. A detailed example of direct and indirect emissions sources is provided below.

Direct Operational Emissions - Diesel Fuel Storage Tank

Potential emissions from future fuel deliveries and fugitive losses.

Indirect Operational Emissions - On-site Forklift Fleet Operations

The SCAQMD staff is unable to determine the operational air quality impacts of the proposed project given that the Draft ND does not provide an inventory of the

¹ Based on telephone communication on 11/19/2013 with Mr. John King, Senior Community Development Planner, City of Paramount.

² SCAQMD CEQA Air Quality Guidance and Methodologies available at:
<http://www.aqmd.gov/ceqa/hdbk.html>

existing forklift fleet (baseline) or new replacement fleet at the project site (i.e., facility). Therefore, the final CEQA document should include an air quality analysis that provides quantification of the baseline fleet emissions (i.e., emissions from the existing onsite forklift fleet) and the replacement fleet (future replacement fleet). Specifically, the air quality analysis should provide a detailed description of the existing fleet and proposed fleet that includes the following:

- Number of equipment pieces,
- Identification of equipment size (i.e., horsepower rating),
- Equipment use (i.e., number of in-use hours and intensity of equipment use),
- Engine Standard (i.e., Tier 1, Tier 2, Tier 3 or Tier 4), and
- Applicable emission factor.

Further, the final CEQA Document should calculate the difference between the existing (baseline) forklift fleet operations and future forklift fleet operations (project). Finally, any potential increase in indirect operational activities resulting from the proposed project should be included (i.e., quantified) in the indirect operational emissions analysis.

Potential Health Risk Impacts

4. Given that the project is surrounded by sensitive land uses (i.e., residential and recreational/park land uses) and could result in an increase of diesel activity during operations the Lead Agency should analyze any additional potential health risk impacts from the proposed project in the final CEQA document. Additional information regarding the SCAQMD's CEQA Significance Threshold for health risk impacts is available at: <http://www.aqmd.gov/ceqa/hdbk.html>

Air Quality Mitigation

5. In the event that the revised air quality analysis demonstrates that the project will result in significant air quality impacts the SCAQMD staff recommends that the Lead Agency include air quality mitigation measures pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) guidelines. If impacts are found to be significant from exhaust emissions, alternative engine technologies should be pursued to reduce this impact to the extent feasible. Additional air quality mitigation measures are available at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

EXHIBIT A

From: Daniel Garcia
Sent: Friday, November 22, 2013 6:30 PM
To: 'Loiler, John'
Cc: 'John King'; Ian MacMillan; Randall Pasek; Mohan Balagopalan
Subject: RE: City of Paramount Request

Mr. Loiler,

Upon review of the Draft Negative Declaration the SCAQMD staff had several questions regarding the proposed project. The following discussion provides some questions from SCAQMD staff specific to the proposed Negative Declaration.

Project Description:

Based on the project description and a discussion with planning staff at the City of Paramount³ it appears that the proposed project includes the installation of an above-ground 1,000 gallon diesel fuel storage tank. The project is intended to facilitate on-site refueling of 10 new diesel fueled forklifts. These new diesel fueled forklifts are part of an effort to replace the facility's existing forklift fleet and comply with state requirements. Specifically, the facility will replace an existing fleet of 40 propane fueled forklifts with a fleet of 29 forklifts consisting of 10 diesel fueled forklifts and 19 propane-fueled/propane powered forklifts. However, the Draft Negative Declaration does not provide an explicit description of the existing fleet (i.e., baseline) or new replacement fleet (future project) nor does the Draft Negative Declaration describe the construction/installation and operational requirements for the diesel fueled tank. As a result, SCAQMD staff cannot determine the emissions impacts from the proposed project. Therefore, air quality impacts from both construction (including demolition, if any) and operations should be calculated.⁴

Construction Emissions - Diesel Fuel Storage Tank Installation

Construction-related air quality impacts typically include, but are not limited to, emissions from the use of equipment for grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., construction equipment such as cranes and front loaders, etc.) and on-road mobile sources (e.g., heavy duty truck(s) for fuel tank delivery, construction worker vehicle trips, material transport trips, etc). All emissions from construction activities required for the proposed project should be

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<http://www.aqmd.gov/ceqa/hdbk.html>

calculated and compared to the SCAQMD's CEQA regional and localized significance thresholds.

Direct Operational Emissions - Diesel Fuel Storage Tank

Potential emissions from future fuel deliveries and fugitive losses.

Indirect Operational Emissions - On-site Forklift Fleet Operations

The SCAQMD staff is unable to determine the operational air quality impacts of the proposed project given that the Draft Negative Declaration does not provide an inventory of the existing forklift fleet (baseline) or new replacement fleet at the project site (i.e., facility). Therefore, the Draft Negative Declaration should include an air quality analysis that provides quantification of the baseline fleet emissions (i.e., emissions from the existing onsite forklift fleet) and the replacement fleet (future replacement fleet). Specifically, the air quality analysis should provide a detailed description of the existing fleet and proposed fleet that includes the following:

- Number of equipment pieces,
- Identification of equipment size (i.e., horsepower rating),
- Equipment use (i.e., number of in-use hours and intensity of equipment use),
- Engine Standard (i.e., Tier 1, Tier 2, Tier 3 or Tier 4), and
- Applicable emission factor.

Further, the Draft Negative Declaration should calculate the difference between the existing (baseline) forklift fleet operations and future forklift fleet operations (project). Finally, any potential increase in indirect operational activities resulting from the proposed project should be included (i.e., quantified) in the indirect operational emissions analysis.

Operational Air Quality Impacts

The operational air quality impacts analysis should be combined from the above mentioned direct and indirect emissions sources and be compared to the SCAQMD's CEQA regional and localized operational emissions significance thresholds.

Potential Health Risk Impacts

Given that the project is surrounded by sensitive land uses and could result in an increase of diesel activity during operations the lead agency should analyze any additional potential health risk impacts from the proposed project. Additional information regarding the SCAQMD's CEQA significance threshold for health risk impacts is available at:

<http://www.aqmd.gov/ceqa/hdbk.html>

Contact Information and Additional Information

Based on any further information pertaining to this response the SCAQMD staff may have additional comments. Should you have any questions regarding these questions and concerns please feel free to contact me at your earliest convenience.

Regards,

Dan Garcia

Air Quality Specialist
Planning, Rule Development, and Area Sources
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¹ Based on telephone communication on 11/19/2013 with Mr. John King, Senior Community Development Planner, City of Paramount.

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<http://www.aqmd.gov/ceqa/hdbk.html>

-----Original Message-----

From: Loiler, John [<mailto:jloiler@cfworks.com>]

Sent: Friday, November 22, 2013 7:04 AM

To: Daniel Garcia

Subject: city of Paramount request

Dan,

I called you earlier this week; you called me back. I thought perhaps email might be a better way to communicate with you. You have some questions for the city of Paramount about a diesel tank that we're installing at our plant. Is there any way we can help you? Is information or materials that you need for this installation?

Let me know please, thank you.

John Loiler
Maintenance Manager
Carlton Forge Works
jloiler@cfworks.com
(562) 633-1131 ext 369
(562) 602-1104 fax

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