



# South Coast Air Quality Management District

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September 19, 2014

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## **Revised Draft Environmental Impact Report (RDEIR) for the Proposed Irwindale Materials Recovery Facility and Transfer Station (SCH NO. 2013051029)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned RDEIR. 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 is designed to receive, process and transfer up to 6,000 tons per day (tpd) based on estimated averages of 3,000 tpd of municipal solid waste, 1,000 tpd of green waste, 1,000 tons per day of construction and demolition materials, and 1,000 tpd of self-haul waste. The proposed MRF/TS operations would consist of sorting, consolidating, and compacting received materials, and then re-loading all material into transfer trucks for transport to additional processing and/or disposal facilities. In addition to processing up to 6,000 tons per day (tpd) of the different waste, the proposed project will generate up to 3,897 total daily trips including 2,456 truck trips, 751 trips associated with the convenience store and 690 daily employee trips. The facility plans to have approximately 345 total full time employees scheduled in three separate shifts and will operate 24 hours per day, 365 days a year. Construction is planned to take approximately 18 months and be completed in late 2015 or early 2016.

The SCAQMD staff is concerned that the siting of the Irwindale MRF/TS Facility is contrary to both the California Air Resources Board (CARB) Guidance in its Air Quality and Land Use Handbook and SCAQMD Rule 410 – Odors from Transfer Stations and Material Recovery Facilities because it is within 1,000 feet of nearby sensitive receptors. Additional comments concerning Rule 410 address requirements for controlling potential odors that could affect nearby sensitive receptors from the facility operations. Further, staff has concerns about the air quality modeling assumptions used for estimating regional, localized and health effect impacts in the RDEIR. Specifically, the modeling inputs for all applicable air quality and health effects analyses should be consistent with the assumptions described in the Final EIR (FEIR). Otherwise, project air quality and

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health effect impacts to nearby sensitive receptors from facility operations are potentially underestimated. Finally, the SCAQMD staff is concerned that all feasible mitigation are not incorporated into the project and should be included in the Final CEQA document. Further details are included in the attachment.

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,



Edward A. Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

EE:IM:DJ:JB:GM

LAC140808-02  
Control Number

### **Siting of an Incompatible Land Use**

1. In the RDEIR, the Lead Agency shows a distance of 100 meters (approximately 325 feet) to the nearest sensitive receptor (residences located south of the project site) from the project site.<sup>1</sup> Further, almost the entire proposed project site is located within 1,000 feet of existing sensitive receptors (family residences) south of the project site. This is confirmed by the location map in the project description and also by an aerial map inspection. Based on guidance from CARB's Air Quality and Land Use Handbook (CARB Land Use Handbook), CARB recommends a buffer of at least 1,000 feet between land uses that will have 100 or more trucks per day and sensitive receptors.<sup>2</sup> The CARB Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process. In accordance with the state CEQA Guidelines §15126.4 (a)(1)(D), the Lead Agency should discuss the proposed siting of this land use and any potential impacts resulting from any proposed mitigation related to the CARB Land Use Handbook guidance in the Final EIR.

Significant regional and localized impacts have been estimated, mostly from the projected 2,456 daily truck trips operating at the project site, many that will be diesel fueled, exposing sensitive receptors to diesel particulate matter emissions that are determined by the California Air Resources Board (CARB) to be carcinogenic. Although 68 percent of the waste collection trucks operated by the applicant are alternative fueled (CNG) in 2014,<sup>3</sup> the remainder of waste collection trucks operated by the applicant and all other three-axle plus trucks, including transfer trucks will be diesel fueled.

### **SCAQMD Rules and Regulations**

2. Starting on page 3.3-13 in the Air Quality Section, the Lead Agency has listed rules and regulations that apply to the proposed project. In addition to these rules and regulations, the Final EIR should include an evaluation of the following:
  - Rule 1133 - Composting and Related Operations - General Administrative Requirements
  - Rule 1133.1 - Chipping and Grinding Activities
  - Rule 1133.2 - Emission Reductions from Co-Composting Operations
  - Rule 1133.3 - Emission Reductions from Greenwaste Composting Operations
  - Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities

### **Odor Management and Practices Requirements**

3. In addition to the Lead Agency's discussion of how the proposed project would comply with SCAQMD Rule 410 (Odors from Transfer Stations and Material

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<sup>1</sup> Chapter 3.3 (Air Quality, Greenhouse Gas, Odor, and Health Risk Assessment), Page 3.3-23.

<sup>2</sup> CARB AQ and Land Use Handbook: <http://www.arb.ca.gov/ch/handbook.pdf>

<sup>3</sup> Ibid. 1, Page 3.3-39.

Recovery Facilities), additional requirements for Rule 410 should be incorporated in the FEIR. On page 3.3-14 and elsewhere in Chapter 3.3 of the RDEIR, the Lead Agency discusses the requirements of Rule 410. The SCAQMD staff finds that, while the RDEIR indicates that an enclosure will be constructed in order to comply with Rule 410, the description of the enclosure fails to adequately ensure that it will comply with Rule 410 (d)(1)(A) and (B). Rule 410 (d)(1)(A) and (B) specifies enclosure opening and ventilation requirements. The FEIR should include a discussion of how the enclosure will comply with Rule 410(d)(1)(A) and (B).

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

4. The RDEIR fails to mention compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities and Federal Regulations Subpart M, NESHAP – National Emission Standard for Asbestos. The Lead Agency should be aware that, as a facility accepting construction and demolition (C & D) material, the facility may not accept any asbestos containing waste material.

#### **Compliance with SCAQMD Rules and Regulations Is Not Mitigation**

5. On page 3.3-43 of the RDEIR, the Lead Agency lists compliance with SCAQMD Rule 461 - Gasoline Transfer and Dispensing and Rule 1193 - Clean On-Road Residential and Commercial Refuse Collection Vehicles as mitigation for operational air quality impacts. Complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. Instead, the effects of complying with a rule, e.g., Rules 461 and 1193 should be part of the project description and incorporated into the project-specific impact calculations.

#### **Air Quality Analysis - Operations**

##### **CalEEMod Fleet Mixture Percentages**

6. The fleet mixture percentage inputs in the CalEEMod land use model should be consistent with the number of vehicles listed in the RDEIR traffic section. Specifically, the CalEEMod model fleet mixture percentage input files provided by the Lead Agency to SCAQMD staff for medium and heavy-heavy duty vehicle categories total approximately five percent of the total vehicle fleet but the percentage of heavy-heavy duty daily truck trips (packer trucks, end dump trucks, roll-off trucks, transfer trucks and, depending on their size, the self-haul trucks) listed in the traffic section<sup>4</sup> make up approximately 63 percent of the proposed project's total daily trips. The CalEEMod modeling fleet mixture percentages should be revised consistent with the traffic trip generation study to avoid substantially underestimating these and other related impacts in the FEIR.

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<sup>4</sup> Table 3.12-11 Project Trip Generation Summary, Chapter 3.12 Traffic Generation and Circulation, Page 3.12-43.

### **CalEEMod - Transfer Truck Trip Lengths**

7. In the narration,<sup>5</sup> the RDEIR describes a one-way 38-mile weighted average travel distance from the proposed Irwindale Facility site hauling waste materials to the different landfill sites; a 34-mile trip length for recycling materials; and a 73-mile trip destination distance for composting materials. In the CalEEMod input files provided by the Lead Agency to SCAQMD staff, however, an average one-way trip length of 6.9 miles was used to estimate operational impacts for the transfer trucks hauling waste, recycling and composting materials to the different disposal sites. In the FEIR, the modeling should be consistent with the distances listed in the Revised DEIR, perhaps by performing separate calculations. As an alternative, the Lead Agency could limit activities, as a condition of occupancy, to the levels described in the analysis. Otherwise, project long-term operational air quality impacts and impacts from other related analyses will be substantially underestimated.

### **Localized Impacts and Health Risk Assessment (HRA)**

8. While the Air Quality section of the RDEIR and corresponding Appendix C has been updated, there is still some key information missing. For the dispersion modeling sections (both LST and HRA), it is not clear how the emissions for each source (roadway or on-site) were calculated and applied to the AERMOD results to get the project's impact. Although the electronic files contain spreadsheets showing the project's impacts, it is difficult to understand what factors were used. Please update Appendix C with more detailed information, such as sample calculations showing how the project's impacts were estimated, and sample calculations showing how the emissions from CalEEMod and/or EMFAC were used to determine the emission rates of the sources modeled. Without these details, it is not possible to review the Air Quality impacts stated in the recirculated DEIR for accuracy.
9. According to the electronic files, project emissions were modeled with emission adjustments by season and hour of day of week without explaining how the adjustment was calculated. According to the project description, the project will be permitted to operate 24 hours per day; seven days per week but will likely operate at a reduced schedule. The Air Quality analysis in the FEIR should therefore explain these two scenarios and analyze the air quality impacts from the scenario which results in the higher impact(s) since it is possible that one scenario will result in higher hourly impacts while the other will result in higher annual impacts. It also appears that the emission rates used were from the 24 hours per day; seven days per week operating scenario but modeled with a reduction in the operating hours. This would likely lead to an under-estimation of the project's modeled impacts for both criteria pollutants and the HRA.
10. Although state regulations only allow five minutes for idling at one time, trucks may idle for five minute periods several times on-site (e.g., queuing to the unloading/loading area(s), at the unloading/loading area(s) and queuing after

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<sup>5</sup> Chapter 3.3 – Air Quality, GHG, Odor, and HRA, Page 3.3-38.

unloading/loading before departure, etc.). The SCAQMD default for idling is 15 minutes on-site. The actual idle times used in the air quality analyzes is unclear. If less than 15 minute of idling is used in the LST and HRA analyses, a mitigation measure should be added that requires the project proponent to limit idling to the time used in the LST and health risk assessment.

### **Modeling for the Proposed Gas Station and SCAQMD Permitting Requirements**

11. Because the SCAQMD is a permitting agency for this portion of the project, hence a responsible agency under CEQA, the modeling conducted for the CEQA analysis should be equivalent, or more conservative, to what is used for the permitting analysis. It appears that there are several aspects of the modeling that may not be consistent with modeling requirements for permitting, as discussed below.
  - a. In the project description, there is a convenience store next to the gas station, however, in the modeled files, building downwash from the convenience store was not considered. In the FEIR, gas station impacts should therefore be re-analyzed with the convenience store or provide a justification why building downwash is not a factor.
  - b. The FEIR should also provide justification for the gas station modeling assumptions such as the exit velocities and volume source parameters for refueling and spillage.
  - c. The dispersion modeling for the gas station should comply with the requirements of SCAQMD Rule 461 - Gasoline Transfer and Dispensing.

### **Modeling for the Health Risk Assessment (HRA)**

12. In the HRA modeling, receptors were only placed in residential areas. The HRA in the FEIR should be revised the receptor grid should start at the project boundary According to SCAQMD HRA modeling procedures,. The cancer risks at each receptor can then be calculated for either a worker or residential receptor, based on the receptor type.
13. The roadways were modeled as volume sources and an area source representing the on-site Diesel Particulate Matter (DPM) emissions was included in the HRA, however, there was no description of how the source parameters and emissions were calculated. Please provide more detailed information in the FEIR as to how the source parameters and emission rates were calculated for each source.

### **Operation Mitigation Measures**

14. The Lead Agency has determined that the proposed project will generate significant operational air quality impacts for ROG and NOx. 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 3.3-42 of the RDEIR to further reduce significant air quality impacts:

Recommended change:

~~MM-AQ-16—Older (prior to 2010 model year) transfer trucks shall be equivalent to Tier 2 emission standards (such as particulate filter traps) prior to onsite use.~~

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.

Recommended additional measures:

The SCAQMD staff recommends that the condition of occupancy documents identify that occupants are required to implement the following 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.
- 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**

15. 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 upon occupancy 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 occupant should also be required to accept and use them.

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

16. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx 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. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, 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. 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 and Convenience Site**

17. Because proposed project generate significant regional NOx 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)