



South Coast
Air Quality Management District

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FAXED: December 24, 2008

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Mr. Ricky Ramos
City of Huntington Beach
2000 Main Street
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**Notice of Intent to adopt a Mitigated Negative Declaration (MND) for
Rainbow Disposal Transfer Station and Material Recovery Facility Improvements 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 (MND).

The SCAQMD 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,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:DG

ORC081121-07
Control Number

Air Quality Analysis - Construction Emissions

1. On page 22 of the Air Quality Assessment Report (AQAR) the lead agency's consultant states that the localized significance threshold (LST) analysis is applicable to projects that must undergo an environmental analysis and are five acres or less. The lead agency should be aware that the LST analysis is applicable to all projects as stated in the SCAQMD's Final LST Methodology Document (Document). Projects that are five acres or less can use the LST lookup tables in Appendix C of the Document. Projects that are larger than five acres should undergo a dispersion modeling analysis to determine localized air quality impacts. The statement on page 22 should be corrected in the final document to reflect the above information.
2. Table 4 on page 21 of the AQAR shows the type and number of pieces of construction equipment anticipated to be used during construction activities. Two types of equipment, breakers and snorkel lifts, do not appear in the list of off-road equipment in the URBEMIS2007 output sheets in Appendix A of the AQAR. It is unclear whether or not this equipment will be used and, if so, whether or not emissions from this equipment were calculated. Please clarify this in the final document and modify the analysis to include emissions from these two types of equipment if necessary.
3. Footnote b to Table 6 of the AQAR states that the construction LST analysis is based on the assumption that the nearest sensitive receptor is located 25 meters from the project site and the project area is five acres. The total project area may be five acres, but according, to the URBEMIS 2007 output sheets in Appendix A of the AQAR, the maximum daily acreage disturbed is as follows: transfer station 2 = 0.78 acre, transfer station 1 = 0.82 acre, and secondary recycling = 0.41 acre. As a result the LST mass rate look-up tables for a one-acre project should be used to determine whether or not localized air quality impacts to local receptors, especially Oak View Elementary School, Oak View Preschool, etc., are significant for each construction phase.
4. In reference to comment #3, the URBEMIS analysis assumes that the maximum daily acreage disturbed is as follows: transfer station 2 = 0.78 acre, transfer station 1 = 0.82 acre, and secondary recycling = 0.41 acre. Since the analysis relies on these maximum acreages disturbed for the construction air quality analysis, mitigation measures should be required by the lead agency to prohibit disturbing more than the acreages assumed for each phase in the analysis.

Air Quality Analysis - Operational Emissions

5. On page 24 of the AQAR, the lead agency's consultant states that the project will result in a net reduction in mobile source emissions related to the phase-in of the new compressed natural gas (CNG) trucks. However, there does not appear to be a phase-in schedule for the CNG trucks or any requirement, e.g., mitigation measure, that all diesel trucks be replaced with CNG trucks upon project operation. Although, not stated, it is assumed that the diesel trucks would be replaced with CNG trucks at the end of their useful life. Since heavy-duty diesel trucks can last 30 years or more, the benefits of a CNG fleet may only accrue at some distant point in the future. Therefore, the analysis of impacts generated by the refuse truck

fleet should be revised to accurately reflect the fleet characteristics when the project becomes operational. Given the long useful life of diesel engines, it is likely that most of the refuse trucks will still be diesel trucks when the project becomes operational.

6. If the facility's diesel-refuse truck fleet is replaced relatively slowly or over a long time timeframe, then a Health Risk Assessment for estimating cancer risks from mobile sources as described in the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions is warranted to assess impacts to local sensitive receptors, including the children and staff at Oak View Elementary School, Oak View Preschool, etc. This document can be downloaded from the SCAQMD's CEQA web pages at the following URL: www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc.
7. Review of the proposed project's operational (mobile source) emissions indicates that the lead agency's consultant used the URBEMIS2007 model to calculate the mobile source emissions. The URBEMIS2007 model uses EMFAC2007 on-road mobile source emission factors for calculating mobile source emissions, which do not specifically include stand alone CNG emission factors. As a result, it is assumed that the fleet will continue to consist primarily of diesel-fueled refuse trucks when the expanded project becomes operational. In addition, the analysis of mobile source emissions appears to be for the 574 new heavy-duty refuse truck trips per day resulting from expanding existing operations. Evaluation of the mobile source analysis fleet make-up in the URBEMIS2007 output sheets in Appendix A of the AQAR, however, indicates that the consultant assumed that almost 52 percent of the refuse vehicle fleet is made up of gasoline powered passenger vehicles and almost 34 percent of the fleet is made up of gasoline powered light-and-medium duty non-diesel trucks. Since 100 percent of the new vehicle trips are from new heavy-duty diesel refuse trucks, the analysis needs to be revised to reflect the correct fleet make-up. If some portion of the fleet consists of CNG refuse trucks when the expansion becomes operational, then CNG emission factors can be used to calculate emissions for the CNG refuse trucks separately. CNG emission factors can be found on California Air Resources Board website at the following URL: www.arb.ca.gov/msprog/onroad/cert/cert.php#4. Without a specific phase-in schedule requirement, however, the lead agency should use the default emission factors in the URBEMIS2007 model and the correct fleet make-up when revising the analysis.
8. On page 24 of the AQAR the lead agency's consultant states that the diesel trucks will be converted to CNG-powered trucks at 1.8 grams per (b)hp-hour. However, depending on the manufacturer and category of engine, CARB has certified CNG engines to 0.2 grams per bhp-hour (www.arb.ca.gov/msprog/onroad/cert/cert.php#4). When replacing diesel refuse trucks with CNG refuse trucks, CNG engines with the lowest emissions should be required by the lead agency.
9. On page(s) 20-21, odor impacts, it is stated that there are no records of the facility as a recipient of any Notices of Violations or Notices to Comply in the last five years. However, since January 1, 2006 the SCAQMD has received 78 complaints alleging objectionable odors and some dust complaints from the Rainbow Disposal Transfer Station and Material Recovery Facility. SCAQMD issued to Rainbow Disposal Transfer Station and Material Recovery Facility a Notice of Violation, P13307, dated September 5, 2007, for creating a public nuisance from odor. Also, SCAQMD issued to Rainbow Disposal Transfer Station

and Material Recovery Facility a Notice to Comply D06793, dated May 31, 2007, to provide a variety of information, and Notice to Comply D15126, dated March 5, 2008, to reduce the amount of particulate matter in the ambient air to prevent fugitive dust emissions.

Trash transfer facilities having throughput in the range of 2,000 – 4,000 tons per day that have substantial enclosure and odor control systems still generate odor complaints, so while compliance with Rule 410 (which does not require an odor control system) may mitigate odors, odor impacts to the community may still occur. SCAQMD staff recommends that at a minimum the project be upgraded and constructed with full enclosure prior to obtaining its increased solid waste permit, in accordance with SCAQMD Rule 410.