



South Coast
Air Quality Management District

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Mr. Mark Tomich
Development Services Director
City of Colton
650 North La Cadena Drive
Colton, CA 92324

**Review of the Draft Mitigated Negative Declaration
for the Colton Iron and Metal Facility Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above mentioned project. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final Mitigated Negative Declaration (MND) as appropriate.

AQMD staff is concerned that potential air quality impacts from this project during construction and operations may not have been thoroughly evaluated and described in the draft MND. For example, the draft MND determines that an expanded facility will not yield any increased activities (visits to the site, onsite activity, etc.) relative to the CEQA baseline, however the facility is not expected to expand until recycled material demand increases sufficiently to warrant expansion. In addition, some mitigation measures as currently written may not effectively maintain air quality impacts at a less than significant level. Lastly, AQMD rules regarding contaminated soils were not addressed in the draft MND.

AQMD staff is available to work with the lead agency to address these air quality issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor - CEQA Section, at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

Attachment
IM
SBC101028-01
Control Number

Incremental Project Emissions During Operation

On page 33 of the draft MND the lead agency states that “CIM has indicated that it does not expect an increase in volume of materials associated with this expansion.” This statement appears to be contradicted by the lead agency’s assertion on page 4 of the draft MND that “The expansion will be implemented in the future . . . as demand for recycled metals increases sufficiently to support this expansion.” It would seem that the expansion of this facility will then necessarily include an increase in activities at the facility above the CEQA baseline. The final MND should therefore include a more thorough description of baseline activities and compare those emissions against the maximum potential project air quality impacts.

Onsite Emissions

The lead agency underestimated emissions from both baseline and project operations by not including emissions from onsite operations such as diesel activities of off-road equipment or idling of on-road vehicles onsite. AQMD staff anticipates that baseline and project emissions will not be equivalent due to a potential increase in onsite activity after project implementation (see comment above) and the use of at least one new piece of diesel equipment (the “Logger”). Emissions from these potentially significant sources of emissions should be quantified and presented in the final MND.

Emission Factors

The lead agency appears to overestimate both project and baseline operational emissions in the draft MND. The air quality technical appendix presents calculations for estimating air quality impacts from operations of the propose project. The PM10 exhaust emission factor used for inbound and outbound truck trips in the table “Emissions from On Road Vehicles” is 0.001689 pounds/mile. This emission factor was obtained from an AQMD table for Heavy-Heavy-Duty Diesel Trucks (HHDT).¹ This emission factor was applied to all 522 baseline truck trips and 517 project trips even though on page 6 of the draft MND the lead agency states that only 17 to 30 trips are made by HHDT. In order to more accurately quantify baseline and project emissions, in the final MND the lead agency should use the HHDT emission factors only for heavy duty diesel trips, and they should use the light duty (passenger vehicle) emission factors for pickup trucks.¹

Operational Mitigation Measures

Mitigation Measure III-20 has been proposed by the lead agency to ensure that air quality impacts will remain less than significant once the facility expands. The measure places a limit on the number of vehicles serving the facility each day. Because Heavy-Heavy-Duty Diesel vehicle emissions are substantially higher than light duty vehicle emissions, AQMD staff recommends that the measure be revised as follows:

- If round-trip light duty truck trips bringing materials to the facility exceed 500 per day and/or heavy duty truck trips exceed 22 per day, CIM shall be required to terminate receipt of material on any given day. A log of operations shall be retained and a summary provided to the City on a monthly basis.

In addition, in order to address emissions from off-road equipment, AQMD staff recommends that the lead agency add a mitigation measure that either limits the number

¹ Available here: <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>

of daily horsepower hours from all off-road diesel equipment onsite, and/or commits to phasing in higher tier off-road equipment on an accelerated schedule, such as requiring all off-road equipment to be Tier 3 by 2012, or Tier 4 by 2015.

Emissions from Soil Remediation

Page 3 of the draft MND states that soils onsite may have been contaminated by petroleum products or other hydrocarbons. However the discussion of contaminated soils in the draft MND is limited to lead contamination. In the final MND, the lead agency should specify that any soil cleanup activities will need to comply with AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.