



South Coast Air Quality Management District

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Planning and Community Development
Planning Division
City of Montebello
1600 W. Beverley Blvd.
Montebello, CA 90640

Draft Environmental Impact Report (Draft EIR) for the Proposed Montebello Hills Specific Plan

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

The SCAQMD is concerned that residents and other sensitive receptors in the proposed residential development would be exposed to borderline significant levels of cancer risk and significant operational NO_x emissions from the active oil field operations that will continue to operate 24 hours per day, seven days per week within the proposed development. The lead agency has estimated that sensitive receptors would be exposed to a cancer risk level of 9.9 in one million compared with the SCAQMD threshold of 10 in one million (1.0×10^{-5}) and would also be exposed to 459 pounds per day of oxides of nitrogen (NO_x) from future ongoing oil field operations, which exceeds the SCAQMD's recommended regional daily significance threshold for NO_x of 55 pounds per day by approximately eightfold. Therefore, the SCAQMD is concerned about the incompatibility of the proposed project with the adjacent ongoing oil field operations where residents would be exposed to elevated air toxic emissions and significant criteria pollutant emissions.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other 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,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC090331-03
Control Number

Construction Air Quality Analysis

1. In the project description on page 3-36, the lead agency estimates that grading during project construction would require approximately six million cubic yards of cut-and-fill for grading, excavation, enhancement of slope stability, and other earthwork. Cut-and-fill operations are described as being balanced on-site, which means no soil would be imported or exported to the site. Since the URBEMIS2007 computer model output sheets in Appendix A show that the analysis is based on 50,000 cubic yards of cut and fill balanced on-site per day, the lead agency should include prohibiting cut-and-fill activities greater than 50,000 cubic yards per day as a construction mitigation measure in the Final EIR.

Project Length with Construction and Operations Overlapping

2. Under construction impacts on page 4.3-12 in the Air Quality Section and in Table 1 (Specific Plan Construction Schedule) on page 2 in Appendix E, the proposed project is scheduled to begin construction in 2009 with project build-out expected to occur in 2019. Under this schedule, construction activities would occur by phase for up to ten years, resulting in on-going construction emission impacts overlapping with operation air quality impacts. If construction and operational phases will overlap, the lead agency needs to sum construction and operation emissions to determine peak daily emissions. The sum of the peak construction and operational emission estimates together would then be compared to SCAQMD's recommended operational daily significance thresholds in the Final EIR/EIS.

Methane Gas Generation

3. In the Draft EIR, the lead agency has included the results of investigation studies conducted in 2007 and 2008 for subsurface methane generation. According to these studies, the methane concentrations could be as high as 6,800 parts per million by volume (PPMV). The Draft EIR includes mitigation measure HM-1 that may require, depending on a soils survey and possible health risk assessment, appropriate engineering and institutional controls, such as vapor barriers, venting systems, etc. Currently, SCAQMD Rule 219 only exempts passive and intermittently active venting systems around residential structures from permit requirements. Any intermittent or continuous active ventilation of gas in a non-residential setting would require a SCAQMD permit. Should the lead agency have permit questions related to this project activity, SCAQMD air quality and compliance staff can be contacted at (909) 396-2618.

Odor Nuisance

4. Due to the location of the proposed project and the proximity of the operation of oil and gas production facilities, there is potential of odor nuisances for the future residents of this proposed project. The project proponent has stated in the Draft EIR that the operator of the oil field will implement a fugitive emission inspection and

maintenance program (I & M program) to reduce the fugitive emissions by up to 80 percent. Although the lead agency describes the implementation of an existing fugitive emission inspection and maintenance program for the well heads and gas plant based on SCAQMD Rule 1173 (Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants), the I & M program was not included in the Draft EIR. Therefore, the SCAQMD staff was unable to validate the program's effectiveness. This I & M program or a summary of the I & M program should be included in the Final EIR for review by the public and other commenting agencies.

SCAQMD Rule 1166 – VOC Emissions from Decontamination of Soil

5. In the project description, the lead agency describes the operation of oil and gas production facilities including active and inactive oil wells within the proposed project site. The lead agency is reminded that, if soil is encountered during excavation that is contaminated by hydrocarbon contaminants, contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions (VOC) from Decontamination of Soil and that compliance should be referenced in the Final EIR.

Health Risk Assessment

6. Use of SCAQMD meteorological data for air dispersion using ISCST3 requires that the calms routine be bypassed in ISCST3. Air dispersion modeling for health risk from oil operations on the proposed project and LSTs from construction emissions from the proposed project did not bypass the calms routine. The calms routine should be bypassed in the air dispersion modeling in the Final EIR.

Oil and Gas Production Equipment

7. In the Draft EIR, the lead agency included a health risk assessment (HRA), which identified a Maximum Individual Cancer Risk (MICR) of 9.9 in one million from the existing oil field operation. The SCAQMD significance threshold is ten in one million (1.0×10^{-5}). According to the project description in Chapter 3, the HRA analysis also includes a maximum of eight new well pads, 168 wells, etc. The lead agency is reminded that new or modified oil field and gas production equipment are subject to SCAQMD permit requirements and regulations and under SCAQMD Rule 1401 - New Source Review of Toxic Air Contaminants, toxic best available control technology (T-BACT). Oil and gas production permit questions should be directed to SCAQMD staff at (909) 396-2578.

Siting of Sensitive Land Uses

8. The proposed project consists of locating 1,200 residential units and associated amenities on and adjacent to an active oil drilling site. Specifically, the project is located within the Montebello Oil Field, an actively operated oil and gas production facility that includes gas plant boilers, flare, and diesel engines that emit criteria and

air toxic pollutant emissions. Because of existing air toxics emissions from active oil field activities, the lead agency performed an HRA that evaluated the worst-case cancer risk exposures to future residents. That cancer risk was estimated to be 9.9 in one million with the SCAQMD threshold being ten in one million (ten in one million [1.0×10^{-5}]). In addition, the lead agency shows on page A-1 of Appendix V that current and future oil field operation emission estimates exposures are 459 pounds per day of NO_x, which exceeds the SCAQMD's recommended daily regional significance threshold for NO_x (55 pounds per day) and could result in significant adverse localized air quality impacts to nearby residential receptors. Therefore, the SCAQMD staff recommends that the lead agency require a buffer distance between any oil field emission sources and any residential receptors of at least 300 meters (approximately 1,000 feet).

Because the proposed project consists of locating residential receptors on and adjacent to existing oil field operations and because oil field operations consist of up to four well work over operations at any one-time, 251 well abandonments, consolidating wells onto five well pads, etc., SCAQMD staff requests that the lead agency require the oil field operators to implement the following mitigation measures to reduce potential criteria pollutant and air toxics emissions exposures to the future residential receptors:

- As necessary, the Operator shall install air quality emission control technologies systems including but not limited to vapor recovery systems that must shall be located, installed, operated and maintained as required by the SCAQMD.
- The Operator shall install a gas blanketing and recovery control device for each drill well use a control device, such as. A state of the art portable flare may be used as part of drilling operations for wells where there exists a potential for odorous gas releases during drilling and installation of a gas blanketing and control device that is demonstrated to not be feasible.
- The Operator shall monitor and report all drilling well emissions using the appropriate emissions detection technology such as a H₂S Monitor; LEL Monitor, OVA or TVA. Drill well emissions data must be submitted to the SCAQMD in a formal report that is received on the fifth day of each calendar month.
- The Operator shall install a detection system that will monitor toxics and vapor space on all crude oil tanks. The detection system shall be capable of monitoring pressure in the vapor space of the tanks and shall monitor toxics. In the case of vapor space, the detection system shall be capable of notifying the operator via an alarm when the pressure in the tanks gets within 10 percent of the tank relief pressure.

- The Operator shall utilize, when deemed necessary, an odor suppressant if loading and transferring material to bioremediation farms.
- The Operator shall electrify all drilling rig engines.
- Where proven feasible the Operator shall at a minimum apply (BARCT) to all existing operational equipment and evaluate the feasibility of implanting BACT to existing equipment or replace equipment with newer, cleaner burning equipment such as the process heater to reduce significant impacts to less than the applicable significance thresholds.

Construction Mitigation Measures

9. Because the lead agency has determined that criteria pollutant emissions from project construction activities will exceed the SCAQMD's daily significance thresholds for volatile organic compounds (VOC), oxides of nitrogen (NO_x), particulate matter PM₁₀ and PM_{2.5}, the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

Recommended changes:

AQ-3

The applicant shall prepare and implement a Fugitive Dust Plan per SCAQMD guidelines including submission of a large operations notification (SCAQMD Form 403) to the Executive Officer of the SCAQMD within seven days of qualifying as a large operation in accordance with SCQMD Rule 403 – Fugitive Dust that shall include the following or other measures with the equivalent level of reduction:

- The maximum speed on unpaved roads shall be limited to ~~2~~ 15 miles per hour.
- Chemical dust suppressant shall be applied ~~annually~~ to unpaved parking areas immediately upon observing visible dust emissions.
- Chemical soil stabilizers shall be applied on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days or less if visible dust emissions are observed).

AQ-5

- Truck idling shall be ~~minimized~~ to no more than five minutes on- and off-site.

VOC

Recommended Additions:

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Use pre-painted construction materials; and
- Contractors shall use varying-pressure-low-volume (VPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency.

NOx

Recommended Additions:

- If Tier 2 or Tier 3 off-road construction equipment is not available, require alternative fueled off-road equipment;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Schedule construction activities and any haul truck deliveries that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas; and
- Improve traffic flow by signal synchronization.

PM10 and PM2.5 (Fugitive Dust)

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and
- Sweep streets at the end of the day or whenever if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

Additional mitigation measure suggestions can be found at
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .