



# South Coast Air Quality Management District

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## **Review of the Final Environmental Impact Report (Final EIR) for the Colton Soil Safe Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The AQMD staff appreciates that the lead agency provided written responses to staff's comments on the draft EIR. Subsequent to providing this written response, AQMD staff has participated in several phone and face-to-face meetings with the project proponents to discuss air quality concerns based on our review of the final Environmental Impact Report (EIR). It is our understanding that the final EIR will be modified and re-released in the near future, partially to reflect changes in the air quality analysis. The comments below are primarily based on the currently released final EIR and are meant as guidance for the lead agency and should be incorporated into the re-released final EIR as appropriate.

### **Health Risk Assessment and Localized Air Quality Analysis**

Based on a review of the final EIR AQMD staff is concerned about the lead agency's evaluation of the project's health risk impacts and localized air quality impacts to residents located adjacent to the project site. Specifically, in the health risk assessment (HRA) the lead agency failed to analyze the Diesel Particulate Matter (Diesel PM) emissions from construction equipment used at the project site and Volatile Organic Compounds (VOC's) from the fill material received and processed for the proposed project. Additionally, the cement was assumed to have up to 6 ppm Cr(VI) in the modeling, consistent with the limits on incoming soils. In order to ensure that the HRA includes all potential chrome emissions from cement processing onsite the final HRA should include locally representative Cr(VI) contents in cement fugitive dust sources onsite. Therefore, the lead agency should revise the final EIR to include the potential

health risk impacts from the release of VOC, PM and Cr (VI) emissions from the project. Also, it does not appear that the localized air quality analysis accounts for all non-permitted sources of emissions at the project site. Therefore, the lead agency should substantiate the localized air quality impacts by providing a detailed list of design/mitigation measures (including equipment lists) applicable to the project and revising the localized air quality analysis as appropriate.

#### Regional Air Quality Analysis

Further, AQMD staff is concerned about the lead agency's regional air quality analysis for the proposed project. Specifically, in the final EIR (i.e. Response to Comments No. 8) the lead agency indicates that the regional air quality impacts are based on the receipt of 33 trucks of imported fill per day. The lead agency states that this value is based on the average amount of fill received per day at the project site and acknowledges that a fluctuation in the availability and processing of the imported fill material could result in a maximum of 60 trucks per day (or up to 150 trips per day based on recent information provided by the project proponents). Given that AQMD's CEQA Regional Significance Air Quality Thresholds are based on the "maximum daily emissions" from land use project's the lead agency should analyze the project's air quality impacts based on the "worst case scenario" (i.e., maximum number of trucks received at the facility-60 trucks per day).

In the event that the lead agency determines that the worst case scenario yields a value other than 60 trucks per day the final EIR should provide a rationale for the revised number of trucks and trip lengths. The rationale should conclusively demonstrate the average net trip rate and trip length, including an analysis of the current operating conditions of the alternate landfills that the soil could go to (i.e., quantity of soil accepted at alternate landfills, general service areas, type of soils accepted, an estimate of quantity of soil diverted from each landfill, etc.). Based on the map provided in the final EIR it appears that there are situations where trucks may be required to travel more or less than they otherwise would travel without the project given the distribution of landfills in a 30 mile radius of the project site.

#### Revised Air Quality Analysis and Contact Information

On March 4<sup>th</sup> and 8<sup>th</sup> of 2011 the project proponent met with the AQMD staff to discuss the air quality concerns identified above. As a result, the project proponent provided additional air quality data and a revised draft air quality analysis with new project design features and mitigation measures. The AQMD staff is currently reviewing the revised air quality analysis. AQMD staff is available to work with the lead agency to address these issues and any other air quality 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial 'I' and 'M'.

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

Attachment

IM:DG

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