



# South Coast Air Quality Management District

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Economic and Community Development  
City of Azusa  
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**Draft Environmental Impact Report (Draft EIR) for the Proposed Waste Management Material Recovery Facility/Transfer Station (MRF/TS), and Household Hazardous Waste Facility (HHWF)**

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes to construct a Materials Recovery Facility/Transfer Station (MRF/TS), scale house, and Household Hazardous Waste Facility (HHWF) at the existing Azusa Land Reclamation landfill. The MRF/TS will operate 24 hours a day, 7-days a week and 365 days a year and the proposed HHWF would operate on weekends only. The proposed facility is designed to receive, process, and transfer up to 3,800 tons per day (tpd) of solid waste including 2,500 tpd of municipal solid waste, 800 tpd of recyclables, and 500 tpd of green waste. Construction would include an approximately 125,000 square-foot processing facility with offices, and a 5,400 square-foot HHWF that would be constructed and operated by Los Angeles County. The lead agency has estimated that project operations will also include 1,445 daily diesel truck trips.

AQMD staff recognizes the air quality benefits that this project provides based on the lead agency's commitment to using alternative fueled consistent with AQMD Rule 1193. However, as the proposed project has the potential for significant air quality impacts, the lead agency should consider additional mitigation measures (described in the attachment) in the Final EIR. In addition, AQMD staff seeks clarification concerning some assumptions in the air quality analysis, including the choice of emission factors and the proposed final destination for municipal solid waste during project operations.

Ms. Susan Cole,  
Senior Planner

May 6, 2011

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Supplemental Environmental Impact Report. The SCAQMD staff is available 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,



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

Attachment

IM:GM

LAC110324-02  
Control Number

### **Off-Road Equipment Used During Project Operations**

1. Because the lead agency has determined that estimated operational air quality impacts will exceed the AQMD's recommended daily significance threshold for oxides of nitrogen (NOx) and would also emit diesel particulate matter (DPM), the lead agency should require that the project proponent commit to purchasing all new off road equipment which is alternative fueled and/or compliant with the ARB and US EPA Off-Road Compression-Ignition Engine Standard for the year in which it is purchased. The project proponent may consider applying for funding through AQMD's SOON program.<sup>1</sup>

### **Heavy Duty Diesel Transfer Trucks**

2. The proposed project will use heavy duty trucks to transfer waste from the Azusa MRF to a nearby landfill. Mitigation measure AQ-3 assures that 100% of all transfer trucks owned by the project proponent and its subsidiaries would use alternative fueled vehicles by December 31, 2016 consistent with AQMD Rule 1193. However it is unclear what proportion of the transfer truck fleet this measure would affect. The Final EIR should provide an estimate of the approximate proportion of the transfer truck fleet that will be owned by Waste Management or its subsidiaries that will serve this facility.

In addition, as the project will have significant regional emissions, the lead agency should consider additional mitigation to reduce the impacts from third party trucks that utilize the facility that are not subject to AQMD Rule 1193. As an example, this could include requiring that any heavy duty diesel truck operators that regularly use the facility to apply in good faith for funding to either retrofit or replace their engine from an established ARB or AQMD funding program (such as Carl Moyer, VIP, Prop 1B, etc.). Details regarding these programs can be found on the following two websites: <http://www.aqmd.gov/tao/Implementation/index.htm> and [http://www.arb.ca.gov/msprog/truckstop/azregs/fa\\_resources.php](http://www.arb.ca.gov/msprog/truckstop/azregs/fa_resources.php)

### **Truck Routes**

3. AQMD staff recommends adding a mitigation measure that would apply to diesel fueled transfer trucks travelling to and from the proposed Azusa MRF/TS facility. In the Traffic Impact Study, project transfer trucks are shown arriving and departing from the MRF/TS project site accessed by Gladstone Street, primarily traveling to and from the proposed project site via S. Irwindale Avenue to and from the (210) Foothill Freeway. In order to avoid potential cumulative exposure to diesel particulate matter from transfer truck emissions from project trucks operating at the proposed Azusa MRF/TS/HHWF and the proposed Irwindale MRF/TS on Arrow Highway, the AQMD staff recommends the following mitigation measure to reduce impacts to residences located in close proximity to Arrow Highway:

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<sup>1</sup> <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

- Diesel fueled transfer trucks shall generally be restricted to using Irwindale Avenue north to the I-210 freeway when arriving or departing the Azusa MRF/TS facility, except for rare circumstances that require alternative routing.

### **Operational Mitigation Measures**

4. Because the lead agency has determined that operational air quality impacts will exceed the AQMD recommended regional daily significance levels, the AQMD recommends the following mitigation measure in addition to the measures proposed by the lead agency in the Air Quality Section starting on page 5.4-14:
  - Design the facility such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
  - 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;
  - Post signs outside of the facility providing a phone number where neighbors can call if there is a specific concern.
  - Sweep streets at the end of the day if visible soil or other debris is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

### **Puente Hills Intermodal Facility**

5. The Puente Hills Intermodal Transfer Facility (ITF) is scheduled to open in 2012 to relieve the closure of the Puente Hills Landfill in 2013. The Draft EIR assumes that in the future, all municipal solid waste (MSW) will be transferred via truck to the El Sobrante Landfill in western Riverside County. The lead agency should clarify why the Puente Hills ITF was not considered as a possible destination of MSW. The Puente Hills ITF is much closer to the Azusa MRF/TS and using this facility could substantially reduce truck emissions associated with this project. If this facility is a feasible option, the lead agency should consider adding a mitigation measure requiring its use in order to reduce air quality impacts.

### **Air Quality Analysis Emission Factors**

6. In the localized air quality analysis for operations, the lead agency uses the BURDEN mode of the EMFAC2007 software for estimates of running exhaust emissions but do not account for starting and idling emissions. These omissions would underestimate the lead agency's operational baseline and project emissions by approximately ten percent. Therefore, AQMD staff recommends that the air quality analysis be revised to account for all of the BURDEN emission profiles in order to more accurately reflect emissions from localized and regional operations in the Final EIR.

7. In the project description on page 3-10, the lead agency shows the proposed MRF/TS/HHW project facility opening in 2012 with full operations (3,800 tons per day) beginning in 2014. On page 71 in the Air Quality Assessment, however, the lead agency used 2014 EMFAC2007 emission factors to estimate operational on-road vehicle emissions for the opening year and 2019 EMFAC2007 emission factors to estimate operational emissions for full operations. The lead agency should reconcile these different opening and full operations dates and apply the appropriate emissions factors in the Final EIR.

#### **Clarification of Odor Management Plan Requirements**

8. AQMD staff recommends that the text contained on page 5.4-31 (paragraph three) of the Draft EIR be modified as noted below:
  - SCAQMD Rule 410 – Odors From Transfer Stations and Material Recovery Facilities also requires the facility to develop an Odor ~~Minimization~~Management Plan (OMP) and have the plan approved by either the SCAQMD or the Local Enforcement Agency (LEA) of CalRecycle.”...