



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

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Los Angeles Department of Water and Power  
Attn: Mr. Hal Messinger, [Hal.Messinger@ladwp.com](mailto:Hal.Messinger@ladwp.com)  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

## **Draft Environmental Impact Report (Draft EIR) for the Proposed Tujunga Spreading Grounds Enhancement Project (SCH #2012021028)**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document and 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 CEQA document.

In the project description, the lead agency proposes construction improvements within the existing 160-acre Tujunga Spreading Grounds (TSG) in order to increase the facility's storage and recharge capacity. This will be accomplished by altering intake facilities and by deepening and/or combining spreading basins. In addition, two new intake facilities will be built. Soil disturbance will include activities to reactivate, deepen, and/or combine basins to increase the facility's storage and recharge capacity. Construction would also involve the disposal of approximately 1.3 million cubic yards of excess soil to disposal sites located near the project.

In the Air Quality Section, the lead agency quantified the project's construction air quality impacts and has compared those impacts with the AQMD's recommended daily significance thresholds. In its analysis, the lead agency concluded that short-term impacts significantly exceed regional and localized thresholds for ROG, NO<sub>x</sub> and PM<sub>2.5</sub>, primarily from combustion equipment emissions. On page 4.1-21 of the Draft EIR, the lead agency proposes mitigation measures to reduce these impacts but considered some measures infeasible: specifically, the measures that required project equipment types to meet higher tiered emission standards based on engine size and a compliance schedule.

The AQMD staff is concerned that although the lead agency considered the tiered equipment mitigation requirements for their feasibility, the Draft EIR does not present substantial evidence that these measures are, in fact, infeasible. The AQMD staff therefore recommends that the Final EIR include a discussion of the availability of this equipment by potential contractors since other lead agencies with similar projects have included these measures to reduce equipment emissions from these sources as project

requirements. If this equipment is determined to be available, these tier schedule conditions can be included as project requirements as mitigation in the Final EIR. Finally, several portions of the air quality analysis should be reviewed and revised to include all relevant sources, and to identify additional opportunities for project mitigation.

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 Environmental Impact Report. The AQMD staff encourage the lead agency and/or its air quality consultant to confer with us prior to publishing the Final EIR to ensure that air quality concerns are appropriately addressed. 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

IM:GM  
Attachment

LAC120816-02  
Control Number

### **Construction Air Quality Mitigation Measures**

1. In the air quality analysis, project construction impacts exceed the recommended daily regional and localized significance thresholds for emissions including ROG, NO<sub>x</sub> and PM<sub>2.5</sub>. The lead agency has cited compliance with AQMD Rule 403 – Fugitive Dust on page 4.1-18 stating that the project would be considered a large operation under Rule 403. Compliance would emphasize dust control and a person would be identified to supervise implementation of dust control measures from Rule 403. Beyond listing Rule 403 as the focus, the lead agency did not detail which measures from Rule 403 it would implement. Therefore, the lead agency is reminded that complying with a rule, regulations, law, etc., should not be considered mitigation if it is required. The lead agency should instead, include the specific measures from Rule 403 that will be implemented into the proposed project and incorporate those measures into the project-specific impact calculations.

The AQMD staff further recommends the following measures to further reduce air quality impacts from the project, if feasible:

#### Recommended Additions:

##### ROG, NO<sub>x</sub> and PM<sub>2.5</sub>

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements;
- Prohibit truck idling in excess of five minutes, on- and off-site;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Reroute construction haul trucks away from congested streets or sensitive receptor areas.

##### PM<sub>2.5</sub> (Fugitive Dust)

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;

- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);
  - Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
  - Replace ground cover in disturbed areas as quickly as possible;
  - Water active sites at least twice daily; and
  - All trucks hauling dirt, sand, soil, or other loose materials are to be covered.
2. Further, other lead agencies in the region including LA County Metro<sup>1</sup>, the Port of Los Angeles, and the Port of Long Beach have also enacted the following mitigation measures discussed and considered by the lead agency in the Draft EIR. Based on other agency's implementation of these measures, the AQMD staff recommends reconsideration of these measures after the lead agency has researched the equipment's availability with contractors likely to bid on the proposed project. Given the significance of impacts both regionally and locally, the lead agency should also investigate incentives that may allow all potential contractors to use higher tiered equipment.

#### Construction Equipment Mitigation Measures

3. Should the lead agency determine that area contractors have equipment available that meets the EPA tier standards according to the following schedules (see cover letter starting in paragraph three), the AQMD staff reiterates the following additional mitigation measures to further reduce ROG, NOx and PM2.5 emissions, if feasible:
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements,
  - Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)<sup>2</sup> have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
    - ✓ Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

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<sup>1</sup> For examples see the Metro Green Construction Policy at:  
[http://www.metro.net/projects\\_studies/sustainability/images/Green\\_Construction\\_Policy.pdf](http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf)

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:  
[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

### **Air Quality Calculations**

4. AQMD staff identified a number of deficiencies in the Draft EIR air quality analysis. These emissions sources must be quantified, and given the significance of impacts, all feasible mitigation measures must be implemented to reduce these impacts to the maximum extent. Each of the items below has specific, quantifiable, and enforceable mitigation measures that can reduce this source of emissions.
  - Idling emissions – With 128 average truck trips per day, there will undoubtedly be substantial idling as these trucks queue when they wait to pick up and drop off their loads, and potentially at site entrances and exits. These idling emissions must be included in regional and localized emissions estimates, as well as in the HRA. AQMD staff recommends an idling time of at least 15 minutes per trip to account for multiple idling points per trip (e.g., entrance, wheel washing at exit, waiting for a load, etc.).
    - Mitigation measures could include enforcing stringent anti-idling policies for both trucks and construction equipment onsite.
  - Truck speeds – The air quality analysis assumes that trucks would travel 30 mph for the regional emissions analysis, and 45 mph for the HRA. Both of these speeds seem overestimated given that truck travel onsite should be considerably lower and it is not clear that trucks will be able to travel this speed on the arterial streets. Emissions factors are typically higher at slower speeds, so the emission

estimates would be expected to increase with this correction. The air quality analysis should include emissions estimates for truck travel onsite, at the disposal site, and speeds on the arterials.

- Mitigation measures could include implementing traffic controls on the arterials to smooth traffic flow. These could include providing dedicated turn lanes, flagmen, synchronized traffic lights, signage, etc.
- Unpaved road dust – The air quality analysis did not include any estimates of fugitive dust generated by trucks traveling over unpaved roads onsite or at the disposal site. Emissions from this activity may be substantial and should be quantified in the revised air quality analysis.
  - Mitigation measures could include applying soil stabilizers to unpaved roads, reducing vehicle speeds onsite, and reducing the length of unpaved roads onsite.
- Paved road dust – The paved road dust calculation relies on an old version of EPA’s AP-42 guidance. The updated equation from the 2011 guidance should be used in the revised air quality analysis. The silt loading factor should be carefully considered given that this project may contribute substantially to silt loading on the local roads.
  - Mitigation measures could include requiring wheel washers, rumble grates, and multiple street sweeper passes per day. Alternatively, there may be opportunities to use a conveyance system to reduce the amount of truck travel.
- Fugitive dust from construction equipment – Fugitive dust calculations in the air quality analysis were only performed for material handling and dozing activities. Given the amount of earth movement onsite, it is not clear if these calculations capture all potential fugitive dust that might be generated from this project. For example, scraper activities may have significantly higher emissions that aren’t captured by the included calculations. AQMD staff requests that the lead agency’s air quality consultant confer with AQMD staff to discuss appropriate calculation methodologies for the proposed project activity.
  - Mitigation measures could include limiting the amount of activity that occurs on a daily basis, especially in specific areas that are located closer to sensitive receptors.
- HRA sources – The HRA only included emission sources associated with diesel emissions from offsite truck travel. As the bulk of emissions from this project will occur from onsite activities, these sources must be added to the dispersion model to estimate potential health risk impacts.

- By including these sources in the HRA, additional mitigation measures may become apparent with the more refined analysis.
- HRA emission rate calculations – AQMD staff is unclear about all of the variables used to estimate diesel emissions for the HRA. In particular, a factor of 0.031 is included in the ‘Average Diesel Particulate, total lbs’ calculation that is unexplained. It is also unclear how the calculated emission rates were put into the dispersion modeling sources.