

Comment Letter #4
City of Moreno Valley
November 4, 1996



November 4, 1996

Department of Public Works
Transportation Engineering
14177 Francis Street
P.O. Box 18015
Moreno Valley, CA 92552-0015
Telephone: (951) 413-4146
FAX: (951) 413-3969

Mr. Ruthanne Taylor-Berger
Air Quality Program Director
Western Riverside Council of Governments
3680 Lemon Street, Suite 300
Riverside, CA 92501

Re: Proposed Amended Rule 403 - Fugitive Dust and
Proposed Rule 1186 - PM_{10} Emissions from Paved and Unpaved Roads and Livestock Operations

Dear Mr. Ruthanne:

We have reviewed the draft Staff Report for the above referenced items and would like to make the following comments. Please feel free to use these comments as you feel necessary.

Proposed Amended Rule 403

4-1 1. Page 403-6, (26) UNPAVED ROADS. This definition would also cover the mail purpose trails of the city. It would not be practical to pave horse trails and off road bike paths.

4-2 2. Page 403-6, (3)(B)(i) - the Rule is proposing to require the removal of bulk material tracked out of a project when the cumulative distance reaches 50 feet on any paved public road. This may necessitate having a sweeper running continuously to sweep after every vehicle leaves the site, which would be impractical for some large grading/hauling operations. Because most sweepers are diesel fueled PM_{10} would increase in the immediate area due to the constant running of the sweeper's motor. This requirement places an economic development hardship on areas that have not developed yet, by driving up the cost of developing.

Proposed Rule 1186

4-3 1. Page 1 - AVERAGE DAILY TRIPS. The ITE trip generation manual can not be used to directly determine the number of trips on a street.

4-4 2. Page 4 - (d)(1) - this section requires the removal of visible roadway accumulations within 72 hours following an event. This would require the city to almost continuously sweep the entire street width during the months of October, November and December, as well as any other time during the year when the wind blows.

4-1

Entrained unpaved road dust relates only to motorized vehicle traffic. Bike and horse trails are not subject to PAR 409 and PR 1186.

4-2

Under the provisions of PAR 403 paragraph (d)(5) owner/operators would have two options for complying with the track-out reduction requirements. Specifically, an owner/operator would be able to either 1) prevent the track-out of material, by any available means, and remove any tracked-out material within one hour, or 2) implement at least one of the Table 3 control actions and remove material at any time it extends more than 50 feet from a project site. Based on these compliance options and the fact that existing Rule 403 presently requires the removal of track-out at any time it extends more than 50 feet from a site, it does not appear that a jurisdiction would need to have street sweepers in continuous operation to be in compliance with the proposed amendments.

4-3

Under the provisions of PR 1186 jurisdictions would be required implement at least one of the following on unpaved roads annually for each of the nine years following rule adoption: 1) pave one mile, or 2) chemically stabilize two miles, or 3) implement speed control on at least three miles. It is acknowledged that in most cases it is not feasible to use the Institute of Traffic Engineers (ITE) trip generation manual to directly determine average daily trips (ADT), however, in instances when an unpaved road serves an identifiable land use (e.g., single family residential development) it can be utilized to estimate ADT. Staff believes that providing flexibility in the ADT determination would have less of an impact than requiring tube counts on all unpaved roads 3,000 feet above mean sea level [exempted under PR 1186 subparagraph (h)(5)(A)].

4-4

Please refer to response to comment 2-3.

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Draft Staff Report

CITY OF MORENO VALLEY TEL: 909-413-3170

Nov 04, 96 12:02 No. 007 P. 02

Comment Letter #4
City of Moreno Valley
November 4, 1996

Mr. Ruthanne Taylor-Sanger
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|------|-----|--|------|--|
| 4-5 | 3. | Page 4 - (g)(2) - this section requires the city to purchase or lease PM ₁₀ efficient street sweeping equipment after January 1, 1999. Who is going to pay the three machines if our existing machines are not ready to be retired and who is going to pay the additional costs associated with these higher cost machines? | 4-5 | Please refer to response to comment 1-2 and 3-3. |
| 4-6 | 4. | Page 4 - (g)(3)(A) - this section requires the installation of 15 MPH speed limit signs on dirt roads per CVC 22256, which has a sunset clause of January 1, 1997. Although allowed by the CVC research conducted in many parts of the country over a span of several decades has shown that drivers are influenced more by the appearance of the road than the prevailing traffic conditions than by the posted speed limit. The average person will not equate a lower speed limit with dirt roads. The 15 MPH limit is a very poor example traffic engineering and it is unlikely to be enforced. | 4-6 | Please refer to response to comment 2-4. Note that in certain situations, speed limits may be the preferred option for a jurisdiction. |
| 4-7 | 5. | Page 4 - (g)(3)(B) - this section requires the installation of speed bumps on dirt roads. How is this going to be done and who is going to assume the liability for intentionally placing an obstruction in a public road? Speed bumps cause a multitude of problems which include safe operation of emergency vehicles and can create drainage problems. The city currently does not use speed bumps on any public streets, paved or otherwise, for any purpose. | 4-7 | PR 1186 provides three compliance options for jurisdictions with qualifying unpaved roads (speed control, chemical stabilization, and paving). Several jurisdictions and agencies have studied the use of chemical stabilizers; contract information and the results of such studies are available. |
| 4-7 | 6. | Page 4 - (g)(3)(C) - this section requires the paving of dirt roads. Who is going to pay for the design and paving of the roads? | 4-8 | The assumptions used in the emissions reductions analysis were based on the most likely compliance scenario. Because water flushing for street cleaning is incompatible with Regional Water Quality Control Board regulations and water conservation practices, it was not included as a likely compliance option. |
| 4-8 | 7. | Page 4 - (g)(3)(D) - this section requires the application of chemical stabilization to dirt roads. The city has tried this method of dirt control and has had little success. This has proved to be more costly than expected, had very poor results, and must be repeated several times a year to be effective. | 4-8 | The cost estimate for PM ₁₀ -efficient street sweepers was based on a recent (1996) purchase made by Sunline Transit Agency. |
| 4-8 | 8. | Page D-6 - Usage Factor - the report states that sweeping is the city option, however cleaning streets with water is practical in some instances when the water will not drain into a storm drain, the option was not evaluated. | 4-9 | The road mileage information presented in the cost-effectiveness analysis was obtained from Caltrans but does not represent the total inventory for each county. Specifically, only "urban" primary arterials, minor arterial, collectors and local streets are included. Moreover, this inventory does not include the road mileage located outside the Basin (e.g. Antelope Valley, Coachella Valley, etc.). |
| 4-9 | 9. | Page D-6 - Usage Factor - see comment 89 | 4-10 | |
| 4-9 | 10. | Page E-4 (g)(2)(1) - assumptions - according to the manufacturers of the street sweeper used in the report the cost estimate for the efficient street sweeper is much too low. | | |
| 4-10 | 11. | Page E-5 (g)(1)(1) - this section states that there are approximately 2,574 streets in Riverside County. This number is severely understated. The City of Moreno Valley has approximately 1,800 streets that total approximately 600 centerline miles. If an accurate analysis is to be done it should be based on lane miles and shoulder miles, since the entire street, not just the gutters or shoulders, will need to sweep following an "event". | | |

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November 4, 1996

Mr. Ruthanne Taylor-Berger
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- 4-11 Page E-3 (6)(1)(4) - The section states an average clean-up would take 10 hours and 2 hours for delivery of equipment. What is the average length and width of the street used?
- 4-12 Page E-4 (6)(1)(5) - Curb and gutter was estimated at \$79,200 per mile. The City is currently estimating curb and gutter at \$95,040 per mile.
- 4-13 Page E-4 (6)(1)(5) - Chemical Stabilization was estimated at \$2,384 per mile. Our last project cost approximately \$16,000 per mile, per year. This is an ongoing process and must be repeated several times during the year. Did the cost analysis cover multiple applications during the year, and did the cost analysis take into account the need for application year after year?
- 4-14 Page E-4 (6)(1)(6) - Asphaltic road base. What exactly is this referring to?
- 4-15 Page E-4 (6)(3) - Paving was estimated at \$164,736 per mile. The city is currently estimating paving at \$176,635 per mile. However prior to the street being paved the street must be graded, surveyed, graded, etc. The city is currently estimating a mile of street at \$659,000 per mile. This includes curb and gutter, but does not include sidewalk. In addition sidewalks maybe needed in order to comply with current ADA standards. Sidewalks would be an additional cost than mentioned above. In addition driveway approaches (sidewalks) are estimated at \$240 each, wheelchairs ramps are \$200 each, and additional costs will be incurred for speedbumps, cross gutters, etc. to finish the street and provide for the change in the drainage pattern. The costs used in this report are grossly under estimated.
- 4-16 17. Page E-6 (6)(3) - Speed Limit Signs. The report gives a cost of \$100 per sign, however does not factor in the number of signs per mile or the ongoing maintenance of the signs. Maintenance includes replacement due to vandalism, graffiti, sun fading, etc. Another factor not considered is the safety of installing a sign along and unprotected shoulder of a dirt road.

If there are any questions in regards to this matter, please contact Jane L. Williams at (909) 413-3146.

Sincerely,



Cheryl Heustader
City Traffic Engineer/Transportation Manager

cc: Gene Rogge, City Manager
Trent D. Pullum, Director of Public Works
Jane L. Williams, Engineering Transportation Coordinator
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- 4-11 For the purposes of the cost-effectiveness analysis, the area to be cleaned following a storm was approximately one acre (4 lane roadway for 100 feet). Please also refer to response to comment 2-3.
- 4-12 As discussed in the staff report, the curb and gutter/chemical stabilization control measure did not meet the BACM cost-effectiveness criteria identified in the 1994 and 1997 PM₁₀ State Implementation Plans (SIP) and, as such, is proposed as a contingency requirement to only be implemented if required by the U.S. EPA. Increasing the curb and gutter costs by approximately 20 percent would not change this conclusion. It is acknowledged that construction costs will vary between jurisdictions.
- 4-13 It appears that the commentator is unclear that the estimate of \$2,384 per mile was for stabilizing an unpaved road shoulder not treating an unpaved road. The cost estimate for chemical stabilization of an unpaved road was \$16,107 and presumes annual reapplications.
- 4-14 Many jurisdictions have successfully used recycled asphalt paving (RAP) for dust control on unpaved roads due to the lower costs when compared to hot asphalt paving (also known as strip paving). Asphaltic road base is another term used for RAP. The draft rule language and staff report text have been revised to use the term recycled asphalt paving instead of asphaltic road base.
- 4-15 The paving cost estimate used in the preliminary draft staff report was based on actual paving costs from a private contractor. During the public process several jurisdictions commented that the paving cost estimate should also include engineering and design costs. In response to these comments, the District increased the cost estimate for paving from \$164,736 to \$350,000 per mile. With this revision and the revised compliance cost assumptions, the cost-effectiveness of the unpaved road treatment requirements is estimated at \$953 per ton of PM₁₀ on an annual basis.

Draft Staff Report

CITY OF MORENO VALLEY P/W TEL: 1-909-413-3170 Nov 04, 96 12:02 No. 007 P. 01

Comment Letter #4
City of Moreno Valley
November 4, 1996

Mr. Ruthanna Taylor-Beyer
Page 3
November 4, 1996

- 4-11 Page E-6 (b)(1)(4) - the section states an average clean-up would take 10 hours and 2 hours for delivery of equipment. What is the average length and width of the street used?
- 4-12 Page E-6 (b)(1)(5) - Curb and gutter was estimated at \$79,200 per mile. The City is currently estimating curb and gutter at \$88,040 per mile.
- 4-13 Page E-6 (b)(1)(6) - Chemical fluidization was estimated at \$2,364 per mile, but had projected cost approximately \$16,000 per mile, SEE PAGE. This is an ongoing process and must be repeated several times during the year. Did the cost analysis cover multiple applications during the year, and did the cost analysis take into account the need for application year after year?
- 4-14 Page E-6 (b)(1)(6) - Asphaltic road base. What exactly is this referring to?
- 4-15 Page E-6 (b)(1)(7) - Parking was estimated at \$184,736 per mile. The city is currently estimating parking at \$178,653 per mile. However prior to the street being paved the street must be designed, surveyed, graded, etc. The city is currently estimating a mile of street at \$558,000 per mile. This includes curb and gutter, but does not include sidewalk. In addition sidewalks may be needed in order to comply with current ADA standards. Sidewalks would be an additional cost than mentioned above. In addition driveway approaches (freeways) are estimated at \$240 each, wheelchair ramps are \$200 each, and additional costs will be incurred for sprinklers, cross gutters, etc. to finish the street and provide for the change in the drainage pattern. The costs used in this report are grossly under estimated.
- 4-16 Page E-6 (b)(8) - Speed Limit signs. The report gives a cost of \$100 per sign, however does not factor in the number of signs per mile or the ongoing maintenance of the signs. Maintenance includes replacement due to vandalism, graffiti, sun fading, etc. Another factor not considered is the safety of installing a sign along and unprotected shoulder of a dirt road.

If there are any questions in regards to this matter, please contact Jane L. Williams at (909) 413-5148.

Sincerely,


Craig A. Neustadter
City Traffic Engineer/Transportation Manager

cc: Gene Rogers, City Manager
Trent D. Pulliam, Director of Public Works
Jane L. Williams, Engineering Transportation Coordinator

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4-16

The assumptions for speed control on unpaved roads have been revised based on public comment. Specifically, the analysis presumes one sign per each quarter mile and the costs have been increased from \$100 to \$200 per sign.

0100

Draft Staff Report

12/05/1996 12:12 353/16/1996

Post: Fax Note 7672

To: JUAN LESTER, MURRIET LIAISON

Company: GCHSPID 3162

From: R. Taylor Berger

Subject: COMMENTS RE RULE 403-1186 FROM THE CITY OF MURRIET

Comment Letter #5
City of Murrieta
December 5, 1996

CITY OF MURRIETA
35448 Buena Vista, Murrieta, CA 92562
Telephone: 908-698-1040 Fax: 908-698-4500



December 2, 1996

Western Riverside Council of Governments
3880 Lamon Street, Suite 300
Riverside, CA 92501
Attn: Ruben Taylor Berger, Director of Air Quality Program

SUBJECT: Comments on SCAQMD Amended Rule 403 and Proposed Rule (PR) 1186

Dear Mr. Taylor Berger:

The City of Murrieta has reviewed the documents regarding changes to Rule 403 - Fugitive Dust, and proposed Rule 1186 - Emissions from paved and unpaved roads and livestock operations. Several concerns have been noted by our staff which we feel need clarification. We appreciate the information that WRCCOG provided us and the opportunity to comment.

The City of Murrieta Submits the following comments for your consideration:

Proposed Amended Rule 403:

1. Requires owners/operators to prevent the track-out of material onto paved public roads.

Who will be responsible for enforcement and how will violations be forced to comply? How will this activity be funded? The financial impact to small staffed city, such as Murrieta, could be significant.

Proposed Rule 1186:

1. Requires treatment for 10% of unpaved roads annually.

Does this include all unpaved roads in the City or just the unpaved roads accepted for maintenance? If the City is responsible for the maintained roads, who will be responsible for non-maintained and/or private roads? The vast majority of unpaved roads are non-maintained. The City maintains approximately five miles of dirt roads and has over thirty miles of non-maintained dirt roads within our jurisdiction. Due to the recent approval of proposition 218 and ongoing budget

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5-1

5-1

The commentator is referred to response to comments 1-6 and 4-2.

5-2

5-2

The PR 1186 unpaved road treatment requirements specified in paragraph (d)(3), which have been modified since the public workshop, would apply to all public unpaved roads. Please also refer to response to comment 3-6.

Draft Staff Report

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PAGE 04

5-2
(cont.)

present, the City is concerned about having to spend scarce resources on unpaved roads, at the cost of existing street maintenance programs.

5-3

2. Requires the privatization of PMA-official street sweepers.

The City currently contracts for street sweeping services. However, the cost of any required upgrades to street sweepers will surely be passed on to the City, thus forcing an increase to the charges collected from residents for this service.

3. Establishes a consistency requirement which would require curb & gutter or sidewalks paved shoulders within five or modified paved roads.

Does modified include roads that are paved as part of the City's street maintenance program? Many of the streets in the older areas of Murietta do not have the needed curb for paved shoulders. Will the City be required to purchase additional right-of-way and how will this be funded? Will roadway projects that have already been designed need to be revisited?

The City of Murietta understands the enormous task that faces the SCAGMID. However, as the pressure on local government increases to provide more services for less money, and the imposition of "unfunded mandates" continues, Cities, such as Murietta, are finding it more and more difficult to comply with all the rules and serve the citizens of our community.

Thank you again for the opportunity to let our voice be heard. If you have any questions or comments, please feel free to contact our Maintenance Superintendent, Mike Brooks at (909)66-7301.

Sincerely,

Don N. Murietta P.E.

Director of Public Works/City Engineer

cc: Stephen Eavette, City Manager

Stephen Mandel, Assistant City Manager

Mike Brooks, Maintenance Superintendent

File

MS:amw/020/20

0102

Comment Letter #5
City of Murietta
December 5, 1996

Please refer to response to comments 1-2 and 3-3.

In response to the comment, paragraph (e)(1) of PR 1186 specifies that unpaved shoulder treatments would only be required for new road construction and future road widening projects. Curb and gutter installation may be feasible in instances where a jurisdiction does not have sufficient right-of-way for paved shoulders. As described in the staff report, PR 1186 subdivision (e) would only become effective if required by the U.S. EPA.

Staff acknowledges the commentor's compliance cost concerns. Staff will continue to work with local jurisdictions to reduce the costs and other impacts.



Planning & Policy
 NOV 20 1996
 COUNTY SANITATION DISTRICTS
 OF LOS ANGELES COUNTY

1935 Westmont Mill Road, Whittier, CA 90601-1400
 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
 Telephone: (310) 699-2411, FAX: (310) 695-4359

CHARLES W. CARRY
 Chief Engineer and General Manager

November 14, 1996
 File No. 31R-10.10

Comment Letter #6
 County Sanitation District of Los Angeles County
 November 14, 1996

Mr. Martin Zeldin
 Planning and Policy
 South Coast Air Quality
 Management District
 21865 E. Cogley Drive
 Diamond Bar, CA 91765

Dear Mr. Zeldin:

Comments on the September 27, 1996 Draft Staff
 Report for Proposed Amended Rule (PAR) 403 and Proposed Rule
 (PR) 1186 and the October 25, 1996 Version of PAR 403 and PR 1186

The County Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to comment on the September 27, 1996 Draft Staff Report for Proposed Amended Rule (PAR) 403 and Proposed Rule (PR) 1186 and the October 25, 1996 version of PAR 403 and PR 1186. We attended the Public Consultation meeting on October 8, 1996, and the Public Workshop on October 29, 1996, and wish to convey our appreciation to you and your staff for your candor in addressing our questions and concerns. The comments provided herein principally address those issues we briefly discussed at the meeting and workshop, as well as several additional issues that have arisen as a result of further review.

Draft Staff Report (September 27, 1996) Comments

- 6-1 1. The Sanitation Districts request that your staff make the appropriate language that inventory changes to the draft Staff Report, Current and Proposed Legislation, page 3, to reflect changes in the construction from landfill.
- 6-2 2. Under BACM Subsection (1)(3)(a), page 13, a candidate Best Available Control Measure (BACM) is considered technologically feasible if "The control technology is currently available." The Sanitation Districts believe that this is too broad and could result in the inclusion of technology that has not been installed in a full-scale operation or operated for any reasonable period. As a result, we recommend that the technology be "demonstrated in practice" in a full-scale operation for at least 12 consecutive months and be commercially available.
- 6-3 PAR Rule 403 (October 25, 1996) Comments
 - 1. The Sanitation Districts appreciate the addition of a "Power Road" definition under PAR 403 (6)(19)

0103

6-1 The PM₁₀ emissions inventory has been revised based on the final AQMP.

6-2 With the exception of the PM₁₀-efficient street sweepers, all the proposed rule requirements are based on existing control technologies (e.g., paving, chemical stabilizers, watering). As described in the staff report, a working group is to be formed to resolve technical issues regarding PM₁₀-efficient street sweeper use prior to the January 1, 1999 procurement date.

6-3 Staff believes that the commentor's proposed language for unpaved roads would not be appropriate as it would exempt public unpaved roads that connect with other public unpaved roads. In response to the comments, PR 1186 contains an exemption for essential public services that are in compliance with Rule 403.

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County Sanitation District of Los Angeles County
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distinguishing between facility access roads not open to through traffic and public gravel roads. However, the same distinction is not afforded to unpaved roads. Under subparagraph (6)(27), "Public unpaved roads are any unpaved roadway owned and maintained by, governmental or quasi-governmental agencies." Unfortunately, this results in an inequity in the landfill industry where landfills are owned and operated by both private and governmental entities. This inequity is not changing under PAR 403, however, PR 1186 (6)(3) requires that public unpaved roads, not private, be subject to one of the four treatment options. As a result, the Sanitation District, as well as other public landfill operators, will be forced to duplicate Rule 403 unpaved road signage that control efforts under PR 1186, not private landfill operators will not. We, therefore, request that language be provided in both PAR 403 (6)(27) and PR 1186 (6)(20) clarifying that unpaved roads at publicly owned landfills, for instance, not be classified as public unpaved roads. Proposed language for both PAR 403 (6)(27) and PR 1186 (6)(20) could read as follows:

UNPAVED ROADS are any unsealed or unpaved roads, equipment paths, or travel ways that are not covered by one of the following: concrete, asphaltic concrete, or asphalt. Public unpaved roads are any unpaved roadway owned and maintained by Federal, State, county, municipal or other governmental or quasi-governmental agencies ~~excluding unpaved roads not controlled by a public landfill operator~~. Private unpaved roads are all other unpaved roadways not defined as public.

The Sanitation District believes that those unpaved roads not connected to public gravel roads generally exist within facilities where PAR 403 applies. Unpaved roads that connect to public gravel roads are generally open to the public and owned by cities and counties which we believe is the focus of PR 1186. However, we understand that not all unpaved roads connecting to a public gravel road are open to public through-traffic, private or public, for instance. The SCAQMD, however, has provided an exemption for those rarely traveled unpaved roads. Additionally, SCAQMD has indicated a willingness at both the Public Consultation Meeting and the Public Workshop to treat these unpaved roads differently, particularly where an emergency situation exists.

Control Option (1) in Table 3 requires stabilization of surfaces "...from the point of intersection with the public gravel surface..." through the use of a chemical stabilizer or through paving. Unfortunately, "...public gravel surface..." is never defined and could be interpreted as something other than a road (i.e., parking lot). The Sanitation District recommends that either "...surface..." be replaced by "...road..." or that "...road..." be inserted between "...paved..." and "...surface..." as is the case under Control Option (2).

PR 1186 (October 25, 1990) Comments

1. The Sanitation District is concerned that PR 1186 could result in duplicative requirements where the facility currently operates under a PAR 403 fugitive dust control plan or takes the action specified in Tables 1 and 2 of PAR 403. For instance, the Sanitation District fugitive dust control plan includes provisions for watering unpaved roads, street sweeping of paved roads, and restricting vehicle speeds on unpaved roads using 15 mph speed limit signs. Then PAR 403 fugitive dust control measures appear to satisfy the requirements contained in PR 1186. We understand that other facilities incorporate different control measures, however, the result is likely the same. The Sanitation District, therefore,

6-4 The suggested rule language has been added to the current version of PAR 403.

6-5 Please refer to response to comment 6-3.

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recommended that PR 1186 include an exception that denies PAR 403 action under fugitive dust control plans or Table 1 and 2 measures as equivalent to the requirements of PR 1186 and that no further actions are necessary. This exception would be consistent with proposed subparagraph (d)(1) that exempts Rule 1158 sources that include control actions that satisfy PAR 403.

2. The definition of "Paved Road", subparagraph (c)(12), is inconsistent with the definition of "Paved Road" under PAR 403 (c)(19) and could result in confusion among the industry as paved access roads at publicly owned landfills would be classified as public paved roads under PR 1186, but not under PAR 403. As stated earlier, this could result in an inconsistency in the industry between public and private landfill operators. This could easily be corrected simply by including the same language contained in PAR 403. Furthermore, as we briefly discussed earlier under the comments for PAR 403, the definitions of public paved and public unpaved roads are inconsistent. Please make the appropriate changes requested in PAR 403 Comment #1.

3. Under subparagraph (d)(2), agencies will be required to purchase, lease, or rent PM₁₀-efficient street sweepers after January 1, 1999, for all new contracts under purchase. The Sanitation Districts are somewhat concerned regarding the availability of PM₁₀-efficient street sweepers and their performance claims. However, during the workshop, staff indicated a willingness to continue research on PM₁₀-efficient street sweepers, particularly their PM₁₀ removal effectiveness. We are encouraged by, and support, your continuing efforts.

4. The Sanitation Districts support the exclusion for unpaved private roads under subparagraph (d)(3). This exclusion eliminates duplicative requirements for PAR 403 sources provided the changes to the definitions of paved and unpaved roads are materialized.

5. Under subparagraph (d)(1), "... all new or modified paved roads..." shall construct said roads in accordance with the American Association of State Highway and Transportation Officials guidelines or approved alternative. The term, "modified," is not defined. In addition, modification is used again in subparagraph (d)(1)(A) and (d)(1)(B). We are uncertain if the provisions of this subparagraph apply to landfill access roads, however, if it is found to apply, we request clarification for the following reasons. During second landfill settling, paved roads tend to settle irregularly resulting in damage to certain paved areas. The Sanitation Districts are concerned that repairs due to landfill settling may be considered a modification under subparagraph (d)(1) and request clarification. Additionally, clarification is needed for "... new..." and its applicability to construction of landfill access roads as the landfill fill area moves from one location to another.

Rule 403 Implementation Handbook (September 27, 1990) Comments

1. Facilities are required to implement one of the fugitive dust control measures for each dust source listed in Appendix C. However, under Land Clearing/Earth Moving, the Wetting control measure has been broken into three separate categories. It is not clear whether a facility need implement one of the three wetting control measures or all three to satisfy PAR 403 if wetting is the chosen mechanism for control. Please clarify that if wetting is chosen, that either one or all three control measures are necessary.

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County Sanitation District of Los Angeles County
November 14, 1996

6-6

The BACM for land clearing/earth-moving is proposed for amendment based on the U.S. EPA's BACM guidance to limit the amount of disturbed surfaces. In order to be in compliance with Rule 403 paragraph (d)(2) an owner/operator conducting watering for dust control would be required to implement measures (A), (A-1), and (A-2). Note: measure (A-2) applies prior to grading, (A-1), and (A-2). Measure (A-2) applies prior to grading, (A) is applicable during grading, and measure (A-1) is appropriate after grading activities have ceased.

6-5
(cont.)

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6-6

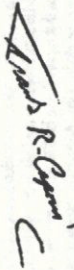
Draft Staff Report

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Page 4

The Sanitation Districts appreciate the opportunity to comment on the Draft Staff Report, PAR 403 and PAR 1186 and look forward to working with you in the future. Please feel free to contact the undersigned if you have any questions or comments.

Very truly yours,

Charles W. Cary



Frank R. Coppi
Supervising Engineer
Solid Waste Management Department

FRCDPF:so

cc: John Lester, SCAQMD
Michael Laybourn, SCAQMD

Comment Letter #6
County Sanitation District of Los Angeles County
November 14, 1996

0106

Comment Letter #7
County of Riverside
November 14, 1996

Md

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Riverside County Executive Office
EX-100



Mr. James M. Lantz, Ph.D., Riverside Office Nov 11-20-96
Mr. Larry Parrish
For your action by: _____
By your action by: _____
Approved by: _____
Approved by: _____
Approved by: _____

Planning & Policy

NOV 20 1996

Larry Parrish
County Executive Office

November 14, 1996

James M. Lantz, Ph.D.
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: Preliminary Comments on the AQMD Draft Rules 403 and 1186

Dear Dr. Lantz:

Thank you for the opportunity to review and comment on the Draft proposed rule amendments (Rules 403 and 1186) for the South Coast Air Quality Management District. During the review period, affected Riverside County Departments and Agencies were requested to review and submit comments regarding these rules to our Transportation and Land Management Agency. This Agency has subsequently compiled the collective preliminary comments, and we have attached those staff comments for your consideration in revising the air quality rules of the District.

As noted above, the attached comments are preliminary. Because of the extensive impact of these rule modifications to Riverside County, and because of the short review period, we will be transmitting additional comments over the next several days. Please consider these our initial comments.

We look forward to working with you on this and other air quality efforts in the future. If you or your staff have any questions regarding the attached material, please contact Tony Cantares of the County Executive Office at (909) 275-1138.

Sincerely,

James M. Lantz

Larry Parrish
County Executive Office

Attachment



cc: Members, Riverside County Board of Supervisors
Executive Director, Western Riverside Council of Governments
Executive Director, Coachella Valley Association of Governments

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