July 10, 2014

SENT VIA E-MAIL ONLY

Mr. Tony Stewart
City of Galt Community Development Department
495 Industrial Drive
Galt, CA 95632

Galt Firing Range Mitigated Negative Declaration (SAC201401507)

Dear Mr. Stewart:

Thank you for providing the Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Galt Firing Range Project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD staff comments follow.

1. Include the Basic Construction Emission Control Practices (noted on page 22 and attached) in the mitigation monitoring plan and/or as a condition of approval.

2. When construction NOx emissions exceed the SMAQMD’s 85 pounds/day threshold of significance, SMAQMD recommends standard mitigation, known as the Enhanced Exhaust Control Practices (attached), be included in the mitigation monitoring plan and/or as a condition of approval. The MND includes mitigation requiring all construction equipment on the project to have EPA Tier 2 or newer engines (noted on pages 23-24). The Enhanced Exhaust Control Practices seek a fleet average emission reduction, which provides flexibility in equipment choice to the owner and contractor when building a project. NOx emissions still exceeding 85 pounds/day after on-site mitigation can be mitigated with a fee.

3. All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800. A list of specific rules that may apply to construction activities or building design is attached for your reference.

Please contact me at 916-874-4881 or khuss@airquality.org if you have any questions regarding these recommendations.

Sincerely,

Karen Huss
Associate Air Quality Planner/Analyst

Attachments

Cc: Larry Robinson, SMAQMD
ATTACHMENTS

**BASIC CONSTRUCTION EMISSION CONTROL PRACTICES**

The following practices are considered feasible for controlling fugitive dust from a construction site. Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.

- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.

- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.

- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).

- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

- Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

- Maintain all construction equipment in proper working condition according to manufacturer’s specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Lead agencies may add these emission control practices as Conditions of Approval (COA) or include in a Mitigation Monitoring and Reporting Program (MMRP).

**ENHANCED EXHAUST CONTROL PRACTICES**

The project representative shall submit to the lead agency and District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project.
• The inventory shall include the horsepower rating, engine model year, and projected hours of use for each piece of equipment.

• The project representative shall provide the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

• This information shall be submitted at least 4 business days prior to the use of subject heavy-duty off-road equipment.

• The District’s Equipment List Form can be used to submit this information.

• The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs.

The project representative shall provide a plan for approval by the lead agency and District demonstrating that the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average 20% NO\textsubscript{x} reduction and 45% particulate reduction compared to the most recent California Air Resources Board (ARB) fleet average.

• This plan shall be submitted in conjunction with the equipment inventory.

• Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

• The District’s Construction Mitigation Calculator can be used to identify an equipment fleet that achieves this reduction.

The project representative shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40% opacity for more than three minutes in any one hour.

• Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately.

• Non-compliant equipment will be documented and a summary provided to the lead agency and District monthly.

• A visual survey of all in-operation equipment shall be made at least weekly.

• A monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey.

The District and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this mitigation shall supercede other District, state or federal rules or regulations.
SMAQMD Rules & Regulations Statement (revised 3/12)

The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration. Other general types of uses that require a permit include, but are not limited to dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Naturally Occurring Asbestos: The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. Asbestos Airborne Toxic Control Measures, Section 93105 & 93106 contain specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.