



South Coast  
Air Quality Management District

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Mr. Amit Pathak, Project Manager  
Department of Toxic Substances Control  
Brownfields & Environmental Restoration Program  
Schools Team  
5796 Corporate Avenue  
Cypress, CA 90630

**Draft Supplemental Environmental Impact Report (Draft EIR) for the Proposed  
Central Region Elementary School No. 20 Remedial Action Plan**

The South Coast Air Quality Management District (SCAQMD) 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 Supplemental Environmental Impact Report.

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 would be happy 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,

Susan Nakamura  
Planning Manager  
Planning, Rule Development & Area Sources

Attachment

SN:EE:GM

LAC090820-05  
Control Number

**Construction Air Quality Analysis**

1. On page 3C-4 in the Transportation and Traffic section of the Draft Supplemental EIR (DSEIR) and on page 4 in Appendix H (Transportation Plan), the amount of truckloads per day estimated to export contaminated soil and import fill material is unclear. The projected truck traffic on page 3C-4 shows an estimate of up to 140 truckloads or up to 280 daily truck trips for activities including export and import of soil but in Appendix H, up to 560 daily truck trips are estimated (up to 140 one-way truckloads per day of soil export and up to 140 one-way truckloads per day for soil import). In the Final Supplemental EIR (FSEIR), the lead agency should revise the wording on page 3C-4 to reflect the estimated truckloads described in Appendix H (see also comment #2). The air quality analysis should also be revised, as needed, to reflect the 280 daily one-way truck trips (560 round-trips). Otherwise, construction on-road vehicle air quality impacts from the Remedial Action Plan (RAP) soil export and import activities would be substantially underestimated in the FSEIR.
2. In the URBEMIS2007 computer model output sheets, the lead agency estimated construction emissions including activities from trucks exporting contaminated soil. Based on the known destinations listed by the lead agency in Appendix H that could potentially receive both the hazardous and non-hazardous soil (Kettleman, CA and Mecca, CA), the mileage used in the analysis appear too low, and may underestimate the emission impacts from trucks. The SCAQMD staff estimated a one way trip mileage to Gorman, CA (furthest travel point within the Basin for a trip to Kettleman, CA) of 64 miles, and 143 one-way miles from the project site to Mecca, California. The SCAQMD staff therefore recommends that the lead agency revise the air quality analysis in the FSEIR to include the total number of truck miles that will take contaminated soil to each of the proposed receiving sites listed in Appendix H. If the number of trucks going to each site is unknown, incorporate the worst-case trip length(s) using the farthest distance(s) traveled within the SCAB for the soil export activities.
3. Based on a phone conversation with the lead agency and SCAQMD staff, the lead agency estimates a distance of up to 30 miles from which clean soil may be imported to the proposed site. The exact sources of the clean soil infill are unknown, however, the lead agency communicated that it is unlikely that the soil will be transported beyond a distance of 30 miles. Upon review of the URBEMIS2007 output sheets used in the analysis for infill, the default value in URBEMIS was used which is a distance much lower than the 30 miles discussed above. The SCAQMD staff recommends that the lead agency estimate the on-road truck impacts from bringing fill materials using the 30 miles, unless additional information is available to substantiate a shorter distance is appropriate.