



South Coast Air Quality Management District

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

E-MAILED: January 4, 2013

January 4, 2013

Peter.Ruttan@dtsc.ca.gov

Mr. Peter Ruttan, DTSC Project Manager
Department of Toxic Substances Control
8800 Ca Center Drive
Sacramento, CA 95826

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Draft Interim Measures Workplan for the PCCR USA, Inc., - Lynwood
Facility**

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 Mitigated Negative Declaration.

In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes to remove and treat contaminated soil from the previous releases of material stored in underground tanks at the site. A previous assessment determined that petroleum hydrocarbons were present in the soil and shallow groundwater at the site. Project activities would include soil disturbance from drilling, excavation and emissions from off- and on-road equipment that would be used to remove approximately 850 cubic yards of impacted soils for off-site treatment and possible import of clean fill. In its air quality analysis, the lead agency estimated short-termed regional impacts for off-road equipment and on-road vehicles hauling the affected soils. The lead agency also cited compliance with AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil due to potential disturbance of soils that may contain petroleum hydrocarbons. In its analysis, however, the Draft MND did not include estimates for the fugitive dust impacts from activities described in the project description (excavation, truck loading, vehicle travel on unpaved/paved roads, etc.). Without these estimates, the lead agency has not demonstrated that total construction impacts are less than significant. The fugitive dust impacts should be included in the Final MND and compared with other construction activity emissions that might also occur at the same time or would overlap to provide the most conservative estimate. These estimates should then be compared with the applicable regional and localized construction daily significance thresholds to determine if project impacts are less than significant.

The lead agency can estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.¹ Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant.²

The AQMD also recommends that the lead agency estimate PM2.5 impacts in response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB using the recommended SCAQMD methodology for calculating PM2.5 emissions.³ Finally, it is recommended that the lead agency evaluate localized air quality impacts since it is noted in Figure 2 on page three of the Draft IS/MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (residential properties) east of the proposed project. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity.⁴

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



Cheryl Marshall
Program Supervisor
Planning, Rule Development & Area Sources

CM:GM

LAC121211-02
Control Number

¹ The AQMD CEQA Air Quality Handbook can be accessed at: <http://www.aqmd.gov/ceqa/oldhdbk.html>

² Mitigation measure suggestions can be found at:
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

³ SCAQMD methodology for calculating PM2.5 emissions found at
http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html .

⁴ SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .