



South Coast Air Quality Management District

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City of Compton
205 South Willowbrook Avenue
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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) No. 929, CUP
No. 2706, Variance Case No. 2727 – Proposed Public CRV Buyback Center,
Wholesale Metal and Wood Recycling 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 convert the existing pallet and skid manufacturing and accessory wood grinding facility into a new operation at the 3.5-acre site. The new uses would include a wood recycling facility, a large wholesale metal recycling facility, and a public California Redemption Value (CRV) buyback center. The metal recycling facility would include an electric powered scrap metal baler and the wood recycling facility that would include an electric powered wood grinding plant. Compared with the existing use, the lead agency has estimated that 11 additional truck trips would be generated by the proposed new uses. Although the lead agency conducted a trip generation analysis comparing potential traffic impacts with the existing use, an air quality analysis was not included with the Draft MND, specifically on any impacts associated with process emissions. Without this substantial evidence to support the lead agency's findings, the lead agency has not demonstrated that project air quality impacts are less than significant.

Regional and localized construction and operational project impacts should be analyzed and compared with recognized significance thresholds. If the project has the potential to emit toxic substances, health effect impacts should also be addressed since sensitive receptors are located just north of the proposed project site. Project impacts should then be included in the Final CEQA document. Guidance for estimating short- and long-term regional and localized air quality impacts is available at the SCAQMD website "<http://www.aqmd.gov/ceqa/hdbk.html>" and the SCAQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that project air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled

mitigation measures that can be implemented to reduce air quality impacts.¹ The SCAQMD staff further recommends that the aforementioned analyses and documentation be made available with the Final CEQA document so that the public, reviewing agencies, and other interested parties can adequately review the basis of these potential impacts.

Finally, the project description includes the use of a proposed scrap metal baler and an existing wood grinding plant, both of which may require permits from the SCAQMD. The lead agency should contact SCAQMD engineering and compliance staff at (909) 396-2591 in order to determine if this and any other equipment used on site requires a permit. If a new permit or modifications to an existing permit are required for this project, then the SCAQMD staff would need to rely on this CEQA document (MND) as a responsible agency.

Please provide the SCAQMD 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,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

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Control Number

¹ Mitigation measures can be located at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.