



South Coast Air Quality Management District

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April 22, 2005

Mr. Waqar Ahmad
Department of Toxic Substances Control
State of California – California Environmental Protection Agency
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

**Draft Standardized Hazardous Waste Facility Permit and Proposed CEQA
Negative Declaration for Advanced Environmental Inc., Fontana, California, EPA
ID. No. CAT 080011695**

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 Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. 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,

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC050315-01
Control Number

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1. On page 5 and 13 of the Draft ND, the lead agency describes construction activities that include the proposed New Tank Farm, North and South Loading and Unloading Racks, Roll-Off Bin Storage Area and relocation of the existing tanks. The lead agency does not, however, estimate the proposed project's short- and long-term emissions, and therefore has not demonstrated that project impacts are less than significant.

Pursuant to CEQA Guidelines §15070(a), which refers to preparation of a negative declarations, states, "The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment,..." Therefore, the Draft ND should include the emission estimates, emission factors, methodologies and control efficiencies for any proposed mitigation measures. This information could be included in the Final ND in a table, as part of the narration or as an appendix. Without this information, the lead agency has not demonstrated that air quality impacts are not significant.

In order to ensure that the proposed project's emission impacts are not significant, the lead agency can utilize the current CARB URBEMIS 2002 emissions model, which can be accessed at <http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.

In the event that quantification of the air quality impacts from the proposed project, either construction and/or operational, exceed established significance thresholds, mitigation measures may be necessary. In addition to identifying feasible mitigation measures, the lead agency should specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.

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2. In the Final ND (see comment #1), the lead agency states on page 6 (Proposed Operations) that storage capacity during the operation of the proposed new tank farm will increase by about 12 percent under the new (DTSC) Permit and alludes to SCAQMD permitting requirements under the Existing Facility section on page 12. The lead agency, however, by not estimating the project impacts from the proposed equipment has not demonstrated that the 12 percent increase in tank capacity will not result in an increase in operational emissions. Simply saying that operational impacts will comply with SCAQMD rules and regulations does not provide full disclosure of impacts to the public. Further, the SCAQMD, as a responsible agency, will use the ND as part of the process to deem permit applications for the proposed project complete. Without quantitative air quality information for stationary equipment subject to SCAQMD permitting requirements, the CEQA document may not be sufficient for SCAQMD permitting purposes. For questions related to SCAQMD permit requirements and estimating operational impacts from the proposed operating equipment, the lead agency can obtain assistance from SCAQMD engineering staff at (909) 396-3611.
3. In the project description on page 5, the lead agency discusses excavation for the Tank Farm foundations that would require a depth of 4-5 feet. If the proposed project includes activities in which soil is found to be contaminated by hydrocarbon contaminants, the lead agency is reminded that contaminated sites would be subject to SCAQMD Rule 1166 and compliance should be referenced in the Final ND.
4. Permit to Construct applications will be need to be submitted to the SCAQMD by the lead agency. These applications should include analyses of typical waste materials stored and calculation of criteria pollutant and Hazardous Air Pollutant (HAP) emissions. This information should have been included in the Draft ND and should also be included in the Final ND.