



South Coast Air Quality Management District

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FAXED: FEBRUARY 15, 2007

February 15, 2007

Mr. Greg Sweel
Department of Toxic Substances Control
Project Manager
5796 Corporate Avenue
Cypress, CA 90630-4732

Dear Mr. Sweel:

**Negative Declaration and Draft Remedial Action Plan for the
East Slag Pile Landfill at the former Kaiser Steel Mill, Fontana**

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 in the final Negative Declaration and Remedial Action Plan.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Negative Declaration and Remedial Action Plan. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS: CB

SBC070116-02
Control Number

Negative Declaration and Draft Remedial Action Plan for the East Slag Pile Landfill at the former Kaiser Steel Mill, Fontana

Emissions from Truck Traffic:

The NO_x and PM10 emissions factors used by the lead agency for on-road heavy-duty haul trucks are less than the emission factors identified by the SCAQMD and in the case of NO_x, substantially lower than the correct EMFAC 2002 emission factor. The correct emission factor should be 16.16 grams per mile (0.035635 pounds per mile). Using the correct emission factor times the heavy-duty haul truck (both onsite and offsite) vehicle miles traveled (VMT) of 11,296.2 (Table 2) results in NO_x emissions of 402.5 pounds per day, which substantially exceeds the SCAQMD's recommended construction significance threshold for NO_x of 100 pounds per day. This does not even include NO_x emissions from the on-site construction equipment.

Reducing Construction NO_x Emissions:

Given that the revised NO_x construction emissions would exceed the significance thresholds, the lead agency is asked to consider the following mitigation measures where feasible:

- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
- For all construction equipment, require the use of alternative clean fuel such as electric or compressed natural gas-powered construction equipment with oxidation catalysts and particulate traps instead of gasoline- or diesel-powered engines. Diesel-powered equipment that has been retrofitted with after-treatment products reduces NO_x by 40 percent. However, where diesel equipment has to be used because there are no practical alternatives, require the use of particulate filters and oxidation catalysts.
- Trucks bringing in the borrow soil and other materials from Riverside to the project site should be required to use alternative fuels such as compressed natural gas or fitted with oxidation catalysts or particulate traps.
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.
- Reroute construction trucks away from congested streets.

Fugitive Dust Control:

On page 11 of the negative declaration the lead agency states that soil will be moistened twice daily in areas of activity. The control efficiency for two waterings per day is 50 percent. According to Table 6, the lead agency uses a fugitive dust control efficiency of 80 percent. The lead agency should revise the fugitive dust analysis using the correct

control efficiency, which will likely result in PM10 emissions exceeding the SCAQMD's recommended PM10 construction significance threshold of 150 pounds per day. As a result, additional fugitive dust mitigation measures will need to be identified.

Please consider the following where feasible:

- Water surfaces before grading
- Enclose, cover, water or apply soil binders to exposed piles, i.e., gravel, sand or dirt.
- Apply approved non-toxic chemical soil stabilizers to all inactive construction areas, or treat unattended construction areas with soil stabilizers, or replace ground cover in disturbed areas.
- Trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Sweep nearby or adjacent streets at the end of the day if visible soil material is carried over from construction site.
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving construction site.
- Reduce on-site vehicle speed to less than 15 mph.
- Pave construction access roads at least 100 feet from the main road.
- Suspend all grading and excavating operations when wind speeds exceed 25 mph.