



South Coast Air Quality Management District

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Department of Toxic Substances Control
5796 Corporate Avenue
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Draft Negative Declaration (Draft MND) for the Proposed Removal Action Workplan for Metropolitan Residential (Parcel B)

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 CEQA document.

In the project description, the lead agency proposes to install a sub-slab liner with venting, monitoring and institutional controls. This would be done to prevent contamination from soil vapor migrating through the building slab into the inside air by the installation of venting pipes and monitoring probes. Finally, a vapor barrier liner would be placed beneath the future building slab.

In the Air Quality Section, the lead agency has estimated regional air quality impacts using the California Emissions Estimator Model (CalEEMod) showing regional construction impacts in Table 5. In addition, operational Localized Significance Thresholds (LST) emission estimates are included on in Table 6, but the localized operational emissions presented in Table 6 do not agree with emissions shown in the modeling output sheets. The Final CEQA document should be revised so that the modeling output emissions and tables are consistent throughout the document.

In addition, localized construction air quality impacts are not presented from the modeling or compared with applicable localized construction thresholds in the Draft ND. Upon review of the CalEEMod modeling output sheets, localized construction emissions exceed the recommend significance thresholds for PM10 and PM2.5. For example, the localized significance threshold from the LST Lookup Tables for PM10 is six pounds per day.¹ The modeling output, however, shows 23 pounds per day of PM10, which exceeds the significance threshold. PM2.5 emissions are estimated to be 15 pounds per day, which exceeds the significance threshold of four pounds per day. The lead agency should revise the Final CEQA document by including localized construction impact estimates and each applicable emission threshold. The SCAQMD staff also recommends

¹ Source Receptor Area 17, Central Orange County, 2 acres at 25 meters.

incorporating the construction mitigation measures included on page 10 into the modeling to determine if localized construction impacts remain significant. If those impacts are still exceed the recommended thresholds, further mitigation should be incorporated in the Final CEQA document to reduce the impacts below significance levels.² Finally, the lead agency should revise the Final CEQA document so that all references to the applicable SRA and emission thresholds for Central Orange County are accurate and consistent throughout the document, i.e., on page nine, the lead agency correctly states that the proposed site is located in Source Receptor Area 17 (Central Orange County), but in a footnote in Table 6 (Localized Operational Emissions), North Orange County is listed. The LST thresholds in Table 6 should also be revised to include the correct thresholds for Central Orange County.

Finally, both alternatives two and three would require that permit applications be submitted to the SCAQMD Executive Officer. For further permit information, please contact engineering and compliance staff at (909) 396-2684.

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 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
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IM:CT:GM

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² http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html