



South Coast Air Quality Management District

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June 18, 2015

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Development Services Department
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Weber Metals Large Press Expansion Project

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 project description, the Lead Agency proposes to expand the existing facility by installing a new 60,000 ton forging press in a new 115,000 square foot building with some excavation required to install the press on the existing site. In addition to the new press, additional new equipment would be installed. Construction is proposed to begin in August 2015 with operations starting in the fall of 2017.

Long-Term Localized Significant Threshold Impacts

The Draft MND makes reference to both construction and operational impacts applying to a localized significance thresholds analysis¹ and includes an analysis of on-site construction impacts in the Draft MND. An analysis of localized operational impacts, however, was not included in the Draft MND. In the Final MND, long-term localized project impacts from all on-site emission sources should be estimated and compared with SCAQMD's localized significance thresholds in order to demonstrate that localized project impacts from operations are less than significant.

The Use of Emission Reduction Credits (ERCs) As Applied to Localized Impacts

The Lead Agency proposes to use ERCs to reduce regional operational impacts but is reminded that the use of ERCs does not mitigate localized impacts from onsite project operations.

¹ Draft IS, Page 13

Regional Impact Analysis

In the air quality analysis, daily Reactive Organic Gas (ROG) emissions from the new press are estimated at 34.99 pounds per day² but it is not clear how the Lead Agency arrived at this estimate. This estimated amount needs to be broken down by emission source and the assumptions, methodologies, calculations, etc., should also be included in the Final MND. In addition, the proposed project will include the use of lubricant to prevent parts from sticking during the forging process. Based on SCAQMD staff estimates, ROG emissions from the lubricant use are approximately 60 pounds per day but it is unclear how the Lead Agency accounted for the ROG emissions from the lubricant in the Draft MND.³ Once the 34.99 estimate is clarified and the estimate for the ROG emissions from the use of lubricant is reconciled with the regional emissions reported for Total Project Operations, the Final MND should be revised accordingly. Finally, any emission changes from on-site sources should also be included in the Localized Significance Threshold Analysis noted in the SCAQMD staff comment above.

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,

Jillian Wong

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JW:MB:TT:GM

LAC150602-11
Control Number

² See also Table 4 (Total Project Operation Emissions (lbs/day) Page 5 in the Initial Study

³ Table B.2-1 and Table 4 (Total Project Operation Emissions (lbs/day) Page 5 in the Initial Study