



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:  
[Hossein.Nassiri@dtsc.ca.gov](mailto:Hossein.Nassiri@dtsc.ca.gov)

September 10, 2015

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

## **Draft Removal Action Workplan (RAW) and Statement of Findings (SOF) for the Former Production Plating Facility in Huntington Beach**

The South Coast Air Quality Management District (SCAQMD) staff 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.

### Project Description

The proposed project involves soil excavation of approximately 3,000 square feet to a depth of 12 feet of soil that has Volatile Organic Compounds (VOCs) and lead in the soil. After excavation, this soil will be hauled off-site and replaced with clean soil. A sub-slab depressurization system will then be installed to mitigate methane and serve to protect against residual VOCs. In the Draft SOF, the Lead Agency cites on page two, that “The City’s<sup>1</sup>” “2013 EA” (Environmental Assessment)”...”further concluded that...because all potentially significant effect(s) (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEAGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.”

If the previous analysis cited above includes project-specific regional and localized emission estimates of the proposed RAW, the SCAQMD staff recommends that those estimates be included in the Final CEQA document in order to demonstrate the Lead Agency’s significance determinations. Regional and localized air quality impacts should be broken down by emission sources, e.g., on-site equipment, fugitive dust, off-site hauling of soil exported from the site and imported as backfill, employee trips, etc. These impacts should then be compared with recognized significance thresholds in order to demonstrate that the project-specific emission impacts are consistent with the Lead Agency’s findings.

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<sup>1</sup>The proposed project site is located in the City of Huntington Beach.

### Regional and Localized Air Quality Analyses

If a project-specific air quality analysis of the proposed RAW was not conducted, the Final CEQA document should therefore include analyses that will estimate regional and localized air quality impacts for construction and operations. SCAQMD staff recommends that these project impacts be quantified and then compared with recognized significance thresholds in the Final CEQA document in order to demonstrate the Lead Agency's significance determinations.

For estimating regional and localized project impacts, the current California Emission Estimator Model (CalEEMod)<sup>2</sup> land use emissions model is available to quantify potential project criteria pollutant and also greenhouse (GHG) emissions. Project emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook.<sup>3</sup> Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures<sup>4</sup> to be implemented if the air quality impacts are determined to be significant in addition to the measures included in the Draft SOF.

Localized air quality impacts should also be evaluated since sensitive receptors (residences) are located within a quarter mile of the project site, southwest of the project site and would potentially be adversely impacted by the construction-related activities, e.g., excavation, soil hauling, etc., occurring at the site. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.<sup>5</sup>

### Proposed Sub-Slab Depressurization System

The proposed cleanup plan includes a Sub-Slab Depressurization System that may require permit review from the SCAQMD. Permit questions regarding the proposed Sub-Slab Depressurization System should be directed to SCAQMD Engineering and Compliance staff at (909) 396-2684.

### Potential Odors

In addition, the Final CEQA document should discuss Rule 402 – Nuisance from potential odors that could potentially come from the methane emissions mentioned in the Draft CEQA document at the project site.

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<sup>2</sup><http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

<sup>3</sup><http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

<sup>4</sup><http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

<sup>5</sup><http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

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Project Manager

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

*Jillian Wong*

Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

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ORC150814-03  
Control Number