South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
SARDemo@polb.com
Renee Moilanen, Director of Environmental Planning
Port of Long Beach
415 West Ocean Boulevard, 7th Floor
Long Beach, CA 90802

October 30, 2026

Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the SA Recycling Facility Demolition and Restoration Project (Proposed Project) (SCH No.: 2026091267)

South Coast Air Quality Management District (South Coast AQMD) Staff appreciate the opportunity to review the above-mentioned document. The Port of Long Beach is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD Staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft IS/MND

Based on the Draft IS/MND, the Proposed Project consists of demolishing and removing existing improvements at an existing recycling facility including an operations and administration building, parking lot, weighing station, truck scales, two railroad spurs, stockpile yard, loading areas, maintenance facilities, utilities, an aboveground storage tank, stormwater conveyance system, concrete, flood lighting, boundary wall, and perimeter fencing, with site restoration and installation of crushed rock and gravel and perimeter fencing upon completion. Based on a review of aerial photographs, South Coast AQMD Staff found that the nearest sensitive receptor (International Seafarers Center) is located about 0.75 miles (4,000 feet) to the east-northeast of the project site.[1] Construction of the Proposed Project is anticipated to occur in November 2026 and end in March 2028.[2] The Proposed Project is located at 482 Pier T Avenue in Long Beach which is within the designated AB 617 Wilmington, Carson, and West Long Beach community.

South Coast AQMD Comments

Regional Air Quality Impact Analysis for Cleanup Activities (Construction)

The Draft IS/MND for the SA Recycling Facility Demolition and Restoration Project identifies chromium and lead in site soils that exceed leachate thresholds at certain locations, as well as arsenic and diesel-range petroleum hydrocarbons associated with historical oil production activities. The document also identifies eight plugged oil wells that will remain on site and are excluded from SA Recycling's project-specific Soil Management Plan (SMP). Because the Proposed Project would remove the existing concrete slab and underlying PVC barrier, the Lead

[1] IS/MND. Page 43.
[2] *Ibid.* Page 120.

Agency should clarify how potentially contaminated soil associated with these wells and pre-lease activities will be investigated, managed, and remediated, including coordination with the Port, which the Draft IS/MND identifies as responsible for addressing contamination from earlier activities.

The Draft IS/MND identifies compliance with South Coast AQMD Rule 403 but does not expressly discuss Rules 1166[3] and 1466.[4] The Lead Agency should clarify whether these rules apply to the project's soil-disturbing activities and identify the applicable compliance measures. Additionally, the Lead Agency should clarify whether the construction emissions estimates and assumed haul trips adequately account for reasonably foreseeable contaminated-soil excavation, handling, and off-site disposal, including the potential need for disposal at facilities farther from the site. Applicable soil-management and air-quality requirements should be incorporated into enforceable project conditions.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the IS/MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

South Coast AQMD staff are available to work with the Lead Agency to ensure that impacts to air quality, GHG emissions, and health risk from the Proposed Project are accurately evaluated and mitigated to the greatest extent possible. Please contact Sahar Ghadimi, Ph.D., Air Quality Specialist, at sghadimi@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:SG
LAC261001-03
Control Number

[3] South Coast AQMD, Rule 1166 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[4] South Coast AQMD, Rule 1466 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf