



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Mr. Craig Chalfant
Craig.chalfant@longbeach.gov
Department of Developmental Services
City of Long Beach
333 W. Ocean Boulevard, 5th Floor
Long Beach, CA 90802

**Revised Draft Initial Study/Mitigated Negative Declaration (Revised Draft /ISMND)
for the Proposed Studebaker LB, LLC Tank Removal 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 Revised IS/MND.

On July 14, 2006, the SCAQMD commented on the proposed Recirculated Draft Environmental Impact Report (RDEIR) for a proposed Home Depot Project (May 2006) proposed at the same project site and incorporates by reference comments #1 and #2 as applicable for this Revised Draft IS/MND. In that comment letter (attached), the SCAQMD noted issues with soil contamination estimates and emissions from soil remediation activities. Although the lead agency has stated on page 24 of the Revised Draft IS/MND that no ground disturbance is proposed during tank removal, excavation equipment emissions are estimated in Appendix B, the Air Quality Worksheets. Should the excavation equipment include soil disturbance activities related to the SCAQMD's previous comments, the SCAQMD recommends that the issues raised in the SCAQMD's previous comments #1 and #2, as applicable, be addressed in the Final Revised IS/MND. The lead agency also estimated regional air quality impacts but did not include an evaluation or discussion of why localized air quality impacts were not included in the Draft IS/MND. Since the lead agency has noted that the project is located within close proximity to residences and two school sites, the SCAQMD recommends that this analysis be performed and included in the Final IS/MND.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Revised /ISMND. The SCAQMD staff would be happy 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachments

IM:GM

LAC101107-05
Control Number

Air Quality Analysis - Construction

1. In the project description, the lead agency describes removal of five existing above-ground storage tanks and associated above-ground piping but the Generated Emissions table in Appendix B (Air Quality Worksheets) shows emissions calculated only for off-road equipment. The analysis does not include the PM10 and PM2.5 fugitive dust emission estimates for the tanks and pipes during the demolition phase before the debris is hauled away. These estimates should be included in the Final MND and Table 1 (Maximum Daily Construction Emissions) should be revised accordingly.

PM2.5 Significance Thresholds

2. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html. Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts or other pollutant air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Localized Significance Thresholds

3. The SCAQMD staff requests that the lead agency evaluate the project's localized air quality impacts to ensure that nearby sensitive receptors are not adversely impacted by construction or operational activities that would occur at the project site. SCAQMD staff notes that on pages 3 and 25, the proposed project site is located approximately 700 feet from residences and with a quarter of a mile of two school sites. The SCAQMD's guidance for performing a localized air quality analysis is available at the following web address:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the lead agency's localized air quality analysis requested above demonstrates that any criteria pollutant exceeds SCAQMD's localized significance threshold, the SCAQMD staff recommends, that, if feasible, the lead agency consider the mitigation measures found at the following website:
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

Soil Remediation

4. In Section VII. Hazardous and Hazardous Materials on pages 24 of the Revised Initial Study/Mitigated Negative Declaration, the lead agency states that “No ground disturbance is proposed during tank removal.” In the Air Quality Worksheets in Appendix B, however, emissions are estimated for excavation equipment. It is therefore unclear if this equipment will disturb the soils contaminated by petroleum hydrocarbons. In the event that any potential excavation activities disturb soil that has the potential to be classified as a hazardous waste, (e.g., petroleum hydrocarbons, etc.) contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and that compliance should be referenced in the Final MND.