



South Coast
Air Quality Management District

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

SENT VIA E-MAIL AND USPS:
maria.martin@lacity.org

January 14, 2016

Ms. Maria Martin, Environmental Affairs Officer
City of Los Angeles Department of Public Works – Bureau of Engineering
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015-2213

**Mitigated Negative Declaration (MND) for the
Asphalt Plant No. 1 Replacement and Modernization Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document both as a commenting agency and a responsible agency. The following comments are meant as guidance for the lead agency and should be incorporated into the Final MND. The lead agency proposes to replace and modernize Asphalt Plant No. 1. The proposed project would involve demolition of the existing plant, excavation and removal of contaminated soils, and construction of a modern plant. If there are permit questions concerning the asphalt plant, they can be directed to Engineering and Compliance Staff at (909) 396-2315.

It is unclear how the lead agency determined the baseline operational emissions. SCAQMD staff recommends the lead agency provide additional discussion on how the values in Attachment B: Project Operation Emissions – Table – Asphalt Plant #1 Existing Operational Emissions were determined.

The lead agency estimated the daily emissions by averaging the annual production throughput. By averaging the annual throughput, the lead agency underestimates the daily maximum emissions. SCAQMD staff recommends the lead agency use the maximum daily production throughput to establish the maximum daily emissions. Furthermore, the maximum daily emissions should be used for determining the significance of the project impacts. If this CEQA document will be used to issue the SCAQMD permit, the lead agency and project applicant should be aware that the SCAQMD permit will include limits consistent with the CEQA document.

The SCAQMD staff is available to work with the lead agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Wong

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

JW:JC
LAC151210-03
Control Number
Attachment