



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

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Steven Ross, DTSC Project Manager ExidePIACleanup@dtsc.ca.gov
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

**Notice of Preparation of a Draft Environmental Impact Report (DEIR) for
the Proposed Preliminary Investigation Area (PIA) Cleanup, Former Exide
Facility**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the DEIR document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the DEIR document that are submitted to the State Clearinghouse are not forwarded to the SCAQMD unless you specifically indicate on the transmittal form to the State Clearinghouse that the SCAQMD is a reviewing agency. Further, if your project involves the installation and operation of equipment that would require an air quality permit or permits from the SCAQMD (e.g., for a boiler, emergency engine, generator, et cetera), then the SCAQMD would be acting as a Responsible Agency, which involves special duties defined in CEQA Guidelines §15096 that include, but are not limited to, a Lead Agency consultation with the SCAQMD prior to the Lead Agency's determination of what type of CEQA document to prepare (see Public Resources Code §§21080.3 and 21080.4). However, the project description does not contain enough detailed information for SCAQMD staff to be able to determine whether this project will require any SCAQMD permits and thus, whether the SCAQMD is a Responsible Agency for this project. The Lead Agency is encouraged to contact my staff should assistance with this determination be necessary. Of course, if the Lead Agency believes that any SCAQMD air permits may be required, please mention this information in the Draft CEQA document and identify SCAQMD as a Responsible Agency for this project.

Please forward a copy of the DEIR document directly to SCAQMD at the address in our letterhead and indicate whether the project may require any SCAQMD permits. **Finally, please send with the DEIR document all appendices and technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the close of the comment period.**

Air Quality Analysis

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air

quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis. The SCAQMD staff recommends that the Lead Agency analyze the air quality impacts in the DEIR document by estimating short- and long-term air quality impacts using the current version of California Emission Estimator Model (CalEEMod)¹. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse gas (GHG) emissions from typical land use development projects. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook² combined with the more recent guidance that has been developed since its publication, as explained in more detail in the following paragraphs³.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a Draft CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

² [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993))

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

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. In addition, SCAQMD staff is available to provide assistance to help the Lead Agency determine whether this project will require any SCAQMD permits. Finally, SCAQMD staff is available to attend any meetings to discuss the scope and content of the DEIR document. If you have any questions regarding this letter, please contact Gordon Mize, Air Quality Specialist by email at gmize@aqmd.gov or by phone at (909) 396-3302.

Sincerely,

Barbara Radlein

Barbara Radlein
Program Supervisor, CEQA Special Projects
Planning, Rule Development & Area Sources

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