



South Coast Air Quality Management District

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

SENT VIA USPS AND E-MAIL:
jlouie@dtsc.ca.gov

September 20, 2013

Ms. Joanne Louie, Project Manager
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2748

Public Notice of Class 2 Standardized Permit Modification for David H. Fell and Company, Inc., Commerce, CA 90040-2904, EPA ID # CAL 000 110 141

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned public notice. The following comments are meant as guidance for the Lead Agency and should be incorporated into the initial study and subsequent draft CEQA document.

The lead agency proposes to modify the existing Standardized Permit by allowing the existing Evaporator Unit to accept waste stream from the metal reclamation facility process, mixed acid and other waste materials identified by waste codes as defined by the Environmental Protection Agency. In a telephone conversation with the lead agency and SCAQMD staff, the lead agency proposes to place an operating condition on the proposed project limiting waste transfer operations to two gallons per week. The lead agency also indicated that it was determining its options under the CEQA Guidelines including consideration of whether the proposed project would qualify for an exemption or whether an initial study would be prepared to determine which CEQA document would be appropriate.

Because the proposed project could create particulate and other emissions during the evaporator process, the SCAQMD may be a responsible agency under CEQA because the evaporator or related control equipment may require a SCAQMD permit(s). This would also require review by the SCAQMD Engineering and Compliance Staff to evaluate potential air quality impacts in both the permit application(s) and the associated CEQA document. Permit questions concerning the proposed project should be directed to Engineering and Compliance Staff at (909) 396-2528. Should SCAQMD permits be required in both the permit application and CEQA document, the lead agency should submit sufficient documentation (methodologies used, air quality emission computations, equations, emission factors, etc.) to demonstrate the lead agency's findings. Specifically, any emissions associated with permitted equipment should be quantified in the CEQA document to avoid the potential duplicate reviews.

Ms. Joanna Louie,
Project Manager

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Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:MB:GM

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