



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

July 31, 2014

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Southwest Metal Company – Draft Remedy Selection Document and Removal Action Workplan

The South Coast Air Quality Management District (SCAQMD) staff has received the Community Survey for Southwest Metal Company and would like to be included in future public participation activities associated with the cleanup effort.

As stated in the Community Survey, Southwest Metal Company, in cooperation with DTSC, will remove and properly dispose of the soils impacted with metals, TPH, PNAs, dioxins, and furans in order to reduce the potential threat to human health and the environment. Approximately 8,000 cubic yards of potentially impacted soil will be excavated, segregated, and sampled. Based on analytical results, soil that exceeds the Site cleanup criteria will be transported offsite to a permitted disposal facility.

The SCAQMD staff would like to remind the DTSC that disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 should be incorporated during the development of the Draft Remedy Selection Document and Removal Action Workplan (RAW). In addition to SCAQMD Rule 1166, the Final RAW should also cite how compliance will occur with SCAQMD Rule 403 – Fugitive Dust and Rule 402 – Nuisance, in case volatile organic compounds are discovered or odors occur during soil disturbance activities. Furthermore, given that the project site is located at a former battery breaking and secondary lead smelting facility, the SCAQMD expresses the utmost concern for the potential of fugitive lead dust emissions generated from the removal and disposal of the impacted soil and recommends that the lead agency develop measures to prevent and mitigate lead emissions in addition to compliance with SCAQMD Rule 1420 – Emissions Standard for Lead.

The SCAQMD staff also requests DTSC include all feasible mitigation in the final CEQA document to protect sensitive receptors near the project site and along truck routes since projected remediation impacts may substantially exceed the SCAQMD

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recommended significance regional and localized thresholds of significance as well as exceeding the lead agency agency's own thresholds.

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 Eugene Kang, Air Quality Specialist at (909) 396-3524 if you have any questions regarding these comments. We look forward to reviewing and providing comment for the Final CEQA document associated with this project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed Eckerle".

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

EE:EK

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