



South Coast
Air Quality Management District
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SENT VIA USPS AND E-MAIL:

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Draft Interim Measures Work Plan (IMWP) – Boyle Heights, East Los Angeles and Maywood (Exide Technologies)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document for proposed testing and removal of lead contaminated soils in residential yards located in portions of Boyle Heights, East Los Angeles and Maywood. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final IWMP.

In the project description, the Lead Agency states that residential soil sampling will be conducted in portions of Boyle Heights and East Los Angeles (Northern Assessment Area) and in Maywood (Southern Assessment Area). Based on sampled areas indicating high levels of lead, a total of 213 homes in both assessment areas may require lead-contaminated soil removal, dust control and air monitoring, yard restoration work and interior home cleaning will be conducted.

The SCAQMD staff 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 incorporate the following measures, in addition to the dust control measures proposed in Section 3.1 of the Draft IWMP, to prevent and mitigate lead emissions:

- Store or clean by wet wash or a vacuum equipped with a filter(s) rated by the manufacturer to achieve a 99.97% capture efficiency for 0.3 micron particles, all lead-contaminated equipment and materials used for any soil excavation activity *immediately* after completion of work in a manner that does not generate fugitive lead dust;
- Immediately after cessation of excavation work on days of high wind speeds (> 20 mph), secure or cover excavation areas and soils in a manner that does not generate fugitive lead dust; and
- Transport excavated, lead-contaminated soils in sealed, leak-proof containers (the Draft IWMP only indicates tarping of haul-off trucks).

The SCAQMD staff also requests that the Lead Agency include in the final CEQA document, identification of mitigation measures to address any accidental spills or releases of excavated soils during its transport near the project site and along the truck routes specified in the Draft IWMP. Due to the Exide facility being subject to SCAQMD Rule 1420.1 – *Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recyclers*, multiple ambient air lead monitors are located at the fenceline of the Exide facility as well as in areas near the project site, and fugitive lead dust emissions generated from excavation and transport of lead-contaminated soils may cause or contribute to exceedances of the Rule 1420.1 ambient air lead concentration limit of $0.150 \mu\text{g}/\text{m}^3$ averaged over any consecutive 30 day period.

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, Program Supervisor 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,

Jillian Baker

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JB:EK

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