



**South Coast**  
**Air Quality Management District**  
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Cleaning the air that we breathe...

SENT VIA USPS AND E-MAIL:  
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September 12, 2014

Mr. Manjul Bose, Project Manager  
Department of Toxic Substances Control  
9211 Oakdale Avenue  
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**Draft Notice of Exemption (NOE) for the  
Former Southland Steel Facility Draft Response Plan**

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

The SCAQMD staff is concerned that the aforementioned Notice of Exemption does not adequately demonstrate the project is exempt from CEQA pursuant to Section 15061 (b) (3) of the California Code of Regulations. Specifically, it does not appear that the Lead Agency has quantified potential significant air quality impacts from the substantial soil excavation, disturbance and haling activities required for the proposed project. As a result, the SCAQMD staff recommends that the Lead Agency include a quantitative regional and localized air quality analysis in the final CEQA document that evaluates any potential emissions (e.g. off-road equipment and on-road transportation emissions) from the proposed project and compares them to the SCAQMD's adopted CEQA Significance Thresholds.<sup>1</sup> If the air quality analysis demonstrates that the project will result in significant air quality impacts the SCAQMD staff recommends that the Lead Agency include air quality mitigation measures pursuant to Section 15126.4 of the CEQA Guidelines.

Further, in addition to compliance with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil the Final Response Plan should discuss how the project will comply with SCAQMD Rule 402 – Nuisance and SCAQMD Rule 403 – Fugitive Dust and Rule if volatile organic compounds and/or odors are emitted during soil disturbance activities. Also, given that previous soil investigations determined that the project site contained Lead contaminated soil the SCAQMD staff is concerned about potential fugitive lead dust emissions generated by the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency develop measures to

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

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prevent lead emissions and comply with SCAQMD Rule 1420 – Emissions Standard for Lead.

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 Response Plan associated with this project.

Sincerely,



Ed Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

EE:EK

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