



# South Coast Air Quality Management District

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August 24, 2016

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## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Coyote Canyon Landfill Gas Recovery Facility Demolition and Telecomm Update (PA2016-091)**

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

In the project description, the Lead Agency proposes demolition of the existing gas-to-energy structures followed by the construction of both temporary and permanent collocated wireless telecommunication facilities. If the proposed telecommunication facilities will also include a diesel-fueled generator(s) that is rated greater than 50 brake horsepower (bhp), a permit would be required for each generator in accordance with SCAQMD rules including Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines. If there are any questions concerning permitting, permit questions can be directed to Engineering and Compliance Staff at (909) 396-2315.

Further, the project includes some demolition that could include some support structures on the facility site as well as excavation during soil disturbance activities. Starting on Page 12 of the Air Study,<sup>1</sup> the Lead Agency discusses SCAQMD Rules. In addition to that discussion, compliance with the following SCAQMD rules should also be included in the Final MND, if applicable: Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities would apply if asbestos is found during demolition, and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil would apply if soils containing Volatile Organic Compounds (VOCs) are encountered during soil disturbance activities.

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<sup>1</sup>DMND, CEQA Air Quality and Greenhouse Gas Technical Study (LSA Associates, Inc., Memorandum Dated May 20, 2016)

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Please provide the SCAQMD 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,

*Jillian Wong*

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JW:GM

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