South Coast
Air Quality Management District
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SENT VIA E-MAIL AND USPS: October 9, 2018

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Mitigated Negative Declaration (MND) for the Proposed Aerocraft Heat Treating Dust Collection Project

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to install four dust collection systems, which will vent two existing buildings that house furnaces used in the heat treatment process at the Aerocraft Heat Treating facility. The project is located at 15701 Minnesota Avenue on the southwest corner of Madison Street and Minnesota Avenue in City of Paramount.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency has determined that the project will not have significant impacts to regional and localized air quality during construction and operation of the project. SCAQMD staff has concerns regarding the discussion of the air pollution control equipment and the air quality analysis in the MND. Please see SCAQMD staff's detailed comments, below.

SCAQMD Staff's Comments

Ultra Low Penetration Air (ULPA) filters

SCAQMD staff is concerned that the main body of the MND does not explain the air pollution control equipment adequately. In accordance with SCAQMD Rule 1402, Aerocraft Heat Treating has prepared a Revised Risk Reduction Plan, which has resulted in the submission of applications to construct and operate four permanent dust collection systems enhanced with Ultra Low Penetration Air (ULPA) filters. The ULPA filters (rated at 99.999 percent control efficiency on 0.12 micron diameter particles) are substantially enhanced particulate control equipment in comparison to the dust collectors (rated at 99.0 percent control efficiency on 10 micron diameter particles) described and discussed in the MND. Therefore, SCAQMD staff recommends that the lead agency revise the final CEQA document by incorporating recommended revisions, which are provided in the enclosed attachment.

Air Quality Analysis

Aerocraft Heat Treating is an existing operational facility that emits regional and localized emissions in the South Coast Air Basin. The MND primarily focused on particulate matter and hexavalent chromium emissions from the facility. However, based on initial sampling conducted by SCAQMD Compliance Staff/Source Testing Staff, other Toxic Air Contaminant metals (e.g. Nickel, Lead, etc.) have been quantified and were analyzed in the evaluation of the dust collection system applications submitted by Aerocraft. Therefore, the permits to construct will include permit conditions to source test for hexavalent chromium as well as other metals. As such, SCAQMD staff is concerned that the air quality analysis

does not analyze the whole of the proposed project.[1] In order to give a good faith effort at full disclosure, the lead agency should use its best efforts to explain how the proposed project will influence the current operational activities and affect the surrounding environment.[2]

Permits

For more information on permits, please visit SCAQMD webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Response to Comments

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Michael Krause

Michael Krause
Planning & Rules Manager
Planning, Rule Development & Area Sources

MK:EM/DN/AM
LAC180927-05
Attachment
Control Number

[1] CEQA Guidelines, Section 15378 (a).
[2] CEQA Guidelines, Section 15204.

Attachment: SCAQMD Staff Recommended Revisions

Page 3	**Paragraph 1:** The word "prevent/preventing" imply 100 percent control efficiency. We recommend that the words "prevent/preventing" be changed to "reduce/reducing".
Page 23	**Paragraph 2:** The word "prevent/preventing" imply 100 percent control efficiency. We recommend that the words "prevent/preventing" be changed to "reduce/reducing". **Paragraph 4:** The dust collector description should be revised as follows: "The new units employ a downward flow cartridge dust collection system equipped with ultra low penetration air (ULPA) filters as a secondary filter. A bag leak detection system (BLDS) will be installed and operated under manufacturer specifications ~~with a pulse cleaning technology that allows for greater air capacity while facilitating maintenance.~~
Page 24	**Exhibit 2-5:** The exhibit describe/states "(4) HEPA filter housings" which should be revised to describe/state "(4) ULPA filter housings."
Page 36	**Paragraph 1:** The word "prevent/preventing" imply 100 percent control efficiency. We recommend that the words "prevent/preventing" be changed to "reduce/reducing".
Page 37	**Paragraph 1:** The word "prevent/preventing" imply 100 percent control efficiency. We recommend that the words "prevent/preventing" be changed to "reduce/reducing".
Page 40	**Paragraph 1:** The word "prevent/preventing" imply 100 percent control efficiency. We recommend that the words "prevent/preventing" be changed to "reduce/reducing". **Additionally, revise paragraph 1 as follows:** …chromium in this portion of the City.[35] The proposed dust collection system is now required by the SCAQMD as a means to mitigate potential emissions. The proposed dust collection system is specifically designed to remove airborne contaminants from the equipment and operations inside the two buildings. All air from each of the two buildings will be vented through the proposed dust collection systems. The dust collection system, as proposed, will clean the interior air volume approximately eight times during a given one hour period. The implementation of the proposed dust collection system may also remove odor causing particulates. ~~The proposed dust collection system is designed to remove airborne contaminants from the indoor work areas and to prevent the airborne particulates from being transmitted into the outdoor work areas. As a result, any particulates that would be typically be found in the indoor air volume will be removed before it is exhausted into the outside air. The dust collection system as proposed will clean the interior air volume approximately eight times during a given one hour period. The implementation of the proposed dust collection system will eliminate the odor causing particulates.~~ As a result, no impacts are anticipated to result from the proposed project's implementation.